

Robin Muirson

29 Jan 2019

Aoraki/Mount Cook NPMP Submissions
Department of Conservation
aorakinp@doc.govt.nz

Dear Sir or Madam

Submission on the Draft Aoraki/Mount Cook National Park Management Plan

Thank you for the opportunity to submit on the Draft National Park Management Plan for Aoraki/Mount Cook National Park (Draft Plan).

I do wish to be heard in support of this submission.

Submission

I wish to support, in full, the submission by the Canterbury Mountaineering Club (CMC) on the Draft Plan.

In summary, I support the following four submission points made by the CMC:

1. Management of the CMC Wyn Irwin Lodge

I support the CMC's submission regarding the retention of Wyn Irwin Lodge in its current location, form, and management. In addition, I support the CMC's submission regarding the use of Wyn Irwin being available for Club members and for non-members where practicable, when not in use by club members and consistent with the purpose of the lodge.

Furthermore, I would like to see the incorrect statements removed regarding the siting of Wyn Irwin Lodge that have been included in the Draft Plan. These are identified in the CMC submission.

I would like to see clarification regarding what 'formal authorisations' are/is, and what 'departmental standards' are, as requested by the CMC's submission.

2. Vehicle access in the Park

I support the CMC's submission regarding proposed solutions to manage traffic congestion within Aoraki/Mount Cook National Park.

The Park and Ride concept may help to mitigate traffic congestion, but it cannot be at the expense of other user groups of Aoraki / Mount Cook National Park who will exit and arrive at the Park at hours outside of the operating hours of proposed Park and Ride. Vehicle access should be maintained for those intending to access Aoraki/Mount Cook National Park overnight and longer. Back country adventurers, particularly mountaineers, climbers, back country walkers, and skiers/snowboarders by the nature of their activity need to be able to start (and finish) trips within the Park at hours that would fall outside any operating hours of the proposed Park and Ride system. If the long and proud tradition of mountaineering in Aoraki/Mount Cook National Park (for which it is internationally famous for) is to be maintained, it is important that this core tenement remains.

There are a number of alternative mechanisms outlined in the CMC submission that DOC should consider to help mitigate traffic congestion and allow freedom of movement for mountaineers, climbers, backcountry walkers, skiers/snowboarders and other similar user groups. I support these proposals put forward in the CMC submission.

3. Aircraft access within the Park

I support the CMC's submission which opposes the proposal in the Draft Plan to increase aircraft traffic and landing zones within Aoraki / Mount Cook National Park.

Increasing use of aircraft within Aoraki Mount Cook National Park will degrade the experience of many user groups within the Park and reduce tranquillity values within the Park. With heightened awareness regarding climate change and anthropogenic impacts on the environment, allowing an increase in aircraft traffic and aircraft access to areas of the Park which previously excluded aircraft (i.e. previously designated high tranquillity, remote areas), is not appropriate or consistent with New Zealand's climate change targets and commitments.

I support the CMC's submission on Hooker Valley remaining aircraft-free, except in case of emergencies requiring evacuation, predator control and scientific research. In addition, the Plan should reflect a stronger focus on preserving foot access to places within the Park outside the front country area. This will benefit the Park as a whole by encouraging more people to venture further into the Park, relieving pressure on front country resources while allowing more people to access the special, high tranquillity areas of the Park like the Hooker Valley.

I support the CMC's submission for the installation of a mid-valley hut (i.e. a replacement for Gardiner Hut) to make access to the head of the valley easier and safer as well as the ongoing maintenance of the Pudding Rock cables.

4. Other Matters

I support the CMC's submission regarding the proposed addition of the Liebig Range and the Godley Valleys to the Park and the World Heritage Area, provided that the Department of Conservation has the sufficient resources to administer these areas.

I also support the CMC's submission advocating for the existing use and access of the Liebig Range (i.e. Cass Valley) and the Godley Valley to allow for 4WD access along the established, unformed legal roads to these areas. I would like to see that these roads are formally identified and maintained to provide safer access to and from these areas, as well to reduce adverse impacts from vehicles in these areas. 4WD access is required in these areas not only to provide access, but also for the New Zealand Deerstalkers Association and the New Zealand Alpine Club as well as other groups, to administer their huts in these areas.

I have attached the CMC's submission with my submission for ease of reference. In accordance with the submission guidelines provided by the Department of Conservation, the CMC submission:

- outlines each of the changes sought
- details the full rationale for seeking these changes
- identifies the relevant sections of the Draft Plan
- outlines the proposed wording changes which would give effect to the changes sought.

Yours sincerely Robin Muirson

Submission Form

Draft Aoraki/Mount Cook National Park Management Plan



Once you have completed this form

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

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

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Submitter details:

Name of submitter
or contact person: Fraser Morrison

Organisation name:
(if on behalf of an organisation)

Postal address: Balclutha

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
 I do not wish to be heard in support of my submission

Signature:

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Submission:¹

Section: <i>Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</i>	Submission: <i>Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</i>	Decision sought: <i>State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:</i> <i>- if supporting: 'retain Policy X'</i> <i>- if opposing: 'delete Policy X'</i> <i>- if seeking changes 'reword Policy X to read (give suggested wording)</i>
1.2.3 Recreational Values (page 42)	SUPPORT – Includes recreational boating	RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park
1.3.1 General Management Bylaws 31 (ii) (page 59)	OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan. Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2.3 (Recreational Values)	DELETE - Bylaw 31 (ii)
1.3.2 Additions to National Parks Policies 2 (a) (page 60)	OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:	DELETE Policy 2 (a)

Please continue on a separate sheet if required.

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

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Submitter details:

Name of submitter or contact person:

Benjamin Ross Grant

Organisation name:
(if on behalf of an organisation)

Postal address:

Temuka

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
 I do not wish to be heard in support of my submission
(tick one box)

Signature:

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- *if opposing: 'delete Policy X'*
- *if seeking changes 'reword Policy X to read (give suggested wording)*

1.2.3
Recreational
Values
(page 42)

SUPPORT – Includes recreational boating

RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park

1.3.1 General
Management
Bylaws
31 (ii)
(page 59)

OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan.
Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2.3 (Recreational Values)


DELETE - Bylaw 31 (ii)

1.3.2
Additions to
National Parks
Policies
2 (a)
(page 60)

OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:

DELETE Policy 2 (a)

Please continue on a separate sheet if required.


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Submission Form

Draft Westland Tai Poutini National Park Management Plan



Once you have completed this form

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

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

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Submitter details:

Name of submitter
or contact person:

Benjamin Ross Grant

Organisation name:
(if on behalf of an organisation)

Postal address:

Temuka

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
 I do not wish to be heard in support of my submission
(tick one box)

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Submission:¹

Section:

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Decision sought:

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- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

3.1 General Management Policies

3.

3.

(page 69)

OPPOSE – because recreational boating on rivers outside the park is currently managed by Maritime NZ which is an appropriate mechanism for river control in this region.

Currently these rivers are all managed by the Westland District Plan under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:

REWORD - Policy 3 to remove reference to 'Riverbeds'

3.2.1 Additions to the Park Policies

1.

1.

(page 73)

OPPOSE – because recreational boating on rivers outside the park is currently managed by Maritime NZ which is an appropriate mechanism for river control in this region.

Currently these rivers are all managed by the Westland District Plan under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:

REWORD - Policies 1 & 2 to remove reference to 'Waters'

3.2.15 Watercraft Policies

(page 89)

SUPPORT – allows for recreational motorised boating

RETAIN - Policies 1 to 6



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4.13 Outcomes
Recreation

SUPPORT – allows for recreational
motorised boating

RETAIN OUTCOMES

(page 103)

Please continue on a separate sheet if required.



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Draft Aoraki/Mount Cook National Park Management Plan



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Submitter details:

Name of submitter
or contact person:

Paul Turner JBNZ Reg SPK

Organisation name:
(if on behalf of an organisation)

Postal address:

Otautau

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
- I do not wish to be heard in support of my submission
(tick one box)

Signature:



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- if supporting: 'retain Policy X'
- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

1.2.3

Recreational Values

Support – Includes for recreational boating

Retain Recreational Values as they are as they provides for the opportunity and to experience all types of recreational boating within the park

1.3.1 General Management

Bylaws

31 (ii)

Oppose – It is contrary to the recreational values of the plan which supports recreational boating. Use of powered watercraft is consistent with the outcomes planned for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place, and the proposed Park Additions. .

Delete Bylaw 31 (ii)

1.3.2

Additions to National Parks Policies

2 (a)

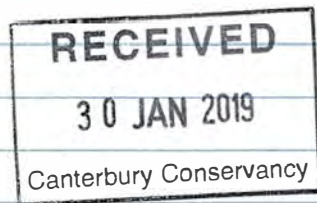
Oppose – Currently under the Mackenzie District Council District Plan and under the RMA which as a matter of NATIONAL IMPORTANCE provides for under Section 6 (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:

Delete Policy 2 (a)

Please continue on a separate sheet if required.

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Dept of Conservation. Aoraki/Mt Cook
Westland Submitters



28.1.19

Dear Sir,

Invercargill 9

My Submission addresses the Philosophy of Public Lands and Natural Parks and their Purpose.

By definition Public Lands and Parks are for the recreation, pleasure and wellness of the people. All the people without distinction. Sadly, select groups may sometimes wish to control and restrict the use of these Public Lands. It's unfortunate, because diversity intrinsically is the most 'valuable'. Additionally these spaces are very large and have little difficulty accomodating a wide range of users. Unfortunately, if we are not alert and careful, ideology can hijack practicality. This is where the Philosophy of Purpose becomes so important.

This Submission addresses the Doctrine of Purpose of these Public Lands and Parks. Something like a Constitution of Rights to ensure Universal participation by hikers, fishermen, adventurers, hunters, Mountain climbers, rafters, jet boaters, helicopters, explorers, 4 wheel drivers, campers and more. Without a question, it is for the benefit and enjoyment and health of everyone to have a broad Purpose of Use, because it serves all of us best in life.

Respectfully, Dr. David Bricker.
Invercargill.

306

Cathie Brumley

From: Warren Plum
Sent:
To: Wednesday, 30 January 2019 8:30 a.m.
Subject: aorakin
Aoraki / Mount Cook NPMP Submissions
Follow Up Flag:
Flag Status: Follow up
Flagged
Categories:
Orange Category

Aoraki / Mount Cook National Park Management Plan Submissions

Department of Conservation

Private Bag 4715,

Christchurch

8140



Nelson Branch New Zealand Deerstalkers Assn submission regarding the Aoraki / Mount Cook National Park Management Plan

.....
Aoraki / Mount Cook National Park Management Plan.
23rd January 2019

Back Ground

The Nelson Branch of NZDA was formed in the 1950's ,and has a membership numbering close to 400. While the branch is located outside the Canterbury region, a large number of our members regularly head south to hunt Tahr. Many have used the Lodge and huts in the National Park, with the Godley being of particular importance to our members. We therefore feel we have a valid and ongoing reason to be involved in the submission process.

Submission.

Nelson Branch of the NZDA wish to support the South Canterbury Branch Submission, and agree in all respects with its comments and suggestions.

We would like to also reiterate a number of the points they cover, as being of particular importance to our local members.

These being as follows.

The retention an unfettered access to Tahr lodge. This provides a traditional and affordable accommodation facility for New Zealanders wishing to experience this area , and is necessary to facilitate hunting with out perceived conflict with other park users. Issues identified around the Park currently appear to be clearly from the influx of overseas tourists , therefore any mitigation needs to target them, not penalize existing NZ resident users.

We contest that hunting is a valid an important recreational use, and has been so historically for many generations of New Zealanders in this area. We therefore fully support the SCNZDA submission that clearly sets out how these objectives can be inter grated into the plans around the Lodge huts and access.

We fully support buffer zones around huts and facilities excluding Aerially Assisted Trophy Hunting in their proximity. We support the retention of Tahr Lodge, the Steffan Memorial, Red stag and Eade Memorial huts. And congratulate the local NZDA branches for their efforts to date, saving and upgrading these important facilities for hunters, climbers and local trampers alike. These back country huts are symbols of our high country, and undoubtedly have a safety factor attached to them.

Finally the Park and Ride restrictions proposed, need to be amended to ensure they target the overseas tourists, not the New Zealand citizens who should continue to have unrestricted access within reason, as originally intended in the principals for National Parks.

To that end we support the retention of vehicular riverbed access up the Godley, and the installation of footbridges over both the Tasman and Murchison rivers. This would reduce pressure on the front country, and provide safe access to hunters and public alike .

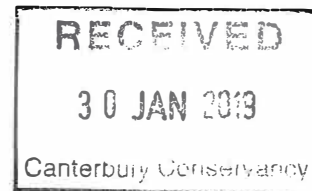
Warren Plum Secretary. NZDA Nelson Nelson

307

Cathie Brumley

From: Rod and Margaret Kirkwood
Sent: Wednesday, 30 January 2019 9:24 a.m.
To: aorakin
Subject: submission on Mt Cook draft management plan
Categories: Orange Category

m>



I am emailing to object to some of the proposed new changes to the Mt Cook management plan .

In particular , I would object to a 10 - fold increase in landings within the proposed areas and widespread extension of landing sites .

I believe this could be up to 200 landings a day which would have a significant impact on the wilderness value of the area - access in to pudding rock and Murchison glaciers would also disrupt what is currently a landing free area . Whilst I would support some limited landings in the lower Murchison , I believe unlimited access to extensive areas would adversely impact on the unique value of this high mountain region .

I am a mountaineer / ski tourer / tramper and have visited the Mt Cook national park for over 30 years and I realise my objections will sound like elitism in preserving access to only a limited few . However , I would argue that my own access has been very limited with only 2 trips into the high neve in the last 10 years but I am reassured to know that the area remains largely unspoilt during this time . In the same way that I will never visit Antarctica or Auckland Islands but am glad that tight restrictions limit over - access . Also , the pressure on high mountain huts would be exacerbated and the visual and noise pollution in these areas would be significant .

I see no reason that DOC has to prostitute itself to the needs of tourist demands and commercial flight operators - remember that most tourists have little understanding of a high mountain environment and so less landings and fewer landing zones will not detract from their experience . It is also a premium tourist experience and shouldn't be devalued by turning Tasman glacier etc into Queenstown airport .

This comes at a time when NZ is facing huge tourist pressure with iconic tourist destinations being overwhelmed by indiscriminate and uncontrolled access - DOC is in a position to control access to these unspoilt areas and yet chooses to increase access 10 fold .

In regard to Unwin hut and more open access ; my understanding is that this hut is owned and operated by NZAC for climbers / ski tourers and has opened up access to backpackers over the last few years . It is a well run , busy and popular hut and I see no reason that DOC should try and impose regulations around its use .

Park and ride options - as a climber / skier / tramper I am obviously concerned at how this would impact on multi day / overnight use of the park .

301
Mt Cook NP has a special place in the hearts of Kiwis , it is THE iconic mountain area and has been managed well since its inception - the current proposals threaten to demean its value . Whilst I see the attraction of "milking the cow twice " ie extracting every tourist dollar possible , i think what will be lost is priceless .

Please consider your options well before losing something very special .

Yours sincerely ,

Rod Kirkwood

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Submitter details:

Name of submitter or contact person:	Neil Whitford
Organisation name: <i>(if on behalf of an organisation)</i>	
Postal address:	Alexandra
Telephone number: <i>(the best number to contact you on)</i>	
Email:	
<input type="checkbox"/> I wish to be heard in support of my submission <i>(this means you can speak at a hearing)</i>	
<input type="checkbox"/> I do not wish to be heard in support of my submission <i>(tick one box)</i>	
Signature:	

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<p>1.2.3 Recreational Values (page 42)</p>	<p>SUPPORT – Includes recreational boating</p>	<p>RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park</p>
<p>1.3.1 General Management Bylaws 31 (ii) (page 59)</p>	<p>OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan. Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2.3 (Recreational Values)</p>	<p>DELETE - Bylaw 31 (ii)</p>
<p>1.3.2 Additions to National Parks Policies 2 (a) (page 60)</p>	<p>OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:</p>	<p>DELETE Policy 2 (a)</p>

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NEW ZEALAND DEERSTALKERS ASSOCIATION INCORPORATED

UPPER CLUTHA BRANCH

Wanaka

30 January 2019

Submission to Draft Aoraki/Mount Cook National Management Plan

Dear Sir/Madam

The Upper Clutha Branch NZDA welcomes the opportunity to comment on the draft plan. Our Branch has a membership of 300 plus, drawn predominantly from the Wanaka/Hawea area, and a large number of our members travel to the National Park on a regular basis to visit and sightsee and hunt for tahr.

We write in support of the submission made by our sister branch, South Canterbury, who have been stakeholders at Mt Cook since 1955 when they built Thar Lodge at White Horse Hill and assisted in the construction of the Hooker Swing Bridge. They have been directly involved and affected by a variety of historic developments and policy decisions at Mt Cook and we take the opportunity to present another recreational hunting perspective, albeit closely in support of theirs.

Our initial impression of the draft plan is that the maori influence is quite overwhelming. We appreciate the Crown's commitment and obligations to the principles of the Treaty of Waitangi, but the extent to which Kai Tahu values, influence and aspirations are 'embedded' in the document is very evident, perhaps excessive. Just what influence early European settlement, other present day New Zealand residents and taxpayers had or are having on activity at Mt Cook, is not clear but is obviously not very significant.

We would like to comment on several of the General Policies and then a few issues about each of the Places. These comments are generally supportive in nature.

1.3.1 General Management – Policy 3 - Page 54

(see 1.3.2 Additions to National Parks) – a bad one to start on.

Policy 12 Visitor and recreation facilities – Page 56

- (a) The proposal to establish a booking system for hut accommodation is supported. We believe this should be extended to include all huts in the Park – Liebig, Onslow and Murchison in the Murchison Valley, Red Stag, Eade Memorial and Godley in the Godley River – plus all those owned or proposed by the various climbing and tramping clubs within the Park, including key huts outside the Park in the Jollie and the Dobson – plus the Lodges at White Horse Hill. Concession fees may be generated by this proposal and the investigation of options for a partnership approach has to be mindful of the existing maintenance and upgrading costs each party is currently liable for. Such a system will better manage the expectations of hunters, climbers and trampers and provide a high quality and safe visitor experience and reduce the frustrations we experience when we find other hunting parties in

residence at these huts despite our best attempts, generally through the helicopter companies, to reserve and book them for our specific use.

Policy 14 (Page 57) The proposal to retain the club lodges in Table 3 through formal authorisations, is supported. Thar Lodge was constructed by South Canterbury Branch NZDA in or about 1955 and has developed a historical association with the Park, providing tahr hunters with accommodation as a base for their hunting activity. The Lodge plays an increasing role in youth and hunter training and as a base for the nationally recognised HUNTS training course and a venue where novice and experienced hunters are introduced to the alpine environment in a safe, managed way. In accordance with Clause 2.1.3 Policy 16 (Page 106) we encourage you to work with the lodge owners to develop options for their long term effective management and retention. The criteria that Thar Lodge has a direct association with the Park should be easily satisfied given Clause 1.3.17 (Page 78) Policy 1 where the Park undertakes to work with hunting groups to facilitate the hunting of wild and game animals.

Tenure for the owners of the Club lodges needs to be formalised by a long term undertaking that gives them some security, avoiding constant review and defensive reaction to threatened changes.

1.3.2. Additions to National Parks (Page 60/62)

This clause suggests the closure of unformed public roads and the addition of riverbed and Conservation land to the Park and we note the comment that the process for adding areas to the Park can not be achieved through the Plan. Whilst we are not clear what that process is, the closure of unformed public roads raises alarm bells for us, suggesting reduced public access. The transfer of the Godley River and Tasman River braided riverbeds also raises alarm bells, particularly when the adjacent contiguous land appears to be in freehold title. Our concern is that these proposals will limit public access to those lands for hunting purposes and we need assurances that public access will continue to be readily available, particularly for vehicular and helicopter traffic, for recreational hunting and animal control purposes.

We just wish to register our concerns about this proposal, pending further information as to process.

1.3.17 Wild and Game Animals (Page 77/78)

We note that the Plan sets a target of zero density for tahr within the Park. We presume this means no tahr at all. Whilst we acknowledge that tahr numbers are excessive and need to be addressed, we are not confident that DOC's quoted population numbers can be substantiated and that zero density is neither realistic nor desirable. The value of tahr to the international hunting community and NZ economy is understated and not appreciated. You will have an indication of the trophy value of tahr through the aerially assisted trophy hunting authorisations that you grant and administer. The addition of the infested Liebig/Upper Jollie/Cass Conservation Areas into the Park will only add to your woes by adding unwanted tahr numbers. We look forward to ongoing consultation between the Conservation Minister, DOC and government representatives, the Game Animal Council and the Tahr Liaison Group to reach a conclusion acceptable to all, hopefully resulting in a review of the Himalayan Thar Control Plan circa 2019.

Your undertaking to work with recreational hunters (Policy 4 Page 78) to manage tahr populations by the most appropriate means is appreciated, even though the zero density goal is not.

Nohoaka Place – Policies 9/11 (Page 105)

We support the proposal to manage high visitor numbers and vehicles, by implementing a public transport service to operate from a park entrance at Birch Hill. Administration of visitor traffic will not be without its problems – business at the Village must be allowed to continue with minimal disruption and screening of traffic must be managed accordingly. **Our support for restricting visitor vehicles is conditional upon free and uninterrupted access continuing to be made available to New Zealanders and any restrictions should only be applied to overseas visitors.** A precedent for this already occurs now on the Great Walks, and this could be simply achieved by a requirement for drivers to produce a NZ driver's licence at the Park entrance to authorise entry.

Policy 15 (Page 106)

The White Horse Hill Campground should be closed and removed to the Birch Hill entrance. However, parking areas and existing facilities should remain and be available for the use of managed day visitors.

Policy 16 (Page 106)

We support the proposal for the Park to work closely with the Lodge owners to develop options for their building's retention, their continued management and availability for their membership and any public use. Club members must have priority of use and public bookings managed in close consultation with the Clubs concerned.

Haupapa Place (Tasman) – Policy 1 (Page 133)

We support the proposal for the development of new walking facilities within the Tasman Glacier. Our priority would be for a bridge across the Tasman Lake outlet to enable access to the lower Murchison valley. The provision of some high-water swing bridges at strategic points across the Murchison River might also be considered.

Pae Tata Place – (Murchison) Policy 6 (Page 143)

As mentioned previously, the booking facility should extend to include all huts in the valley after consultation with other owners. Maximum booking periods should be determined after considering demand – two nights is not sufficient for hunting trips.

Pae Tawhiti Place – (Godley) Policy 3 (Page 149)

This is a popular hunting area. Provision must be made to allow vehicle access, but not beyond Separation Stream. The hut booking proposal should be extended to include NZDA huts in this area, but only on terms acceptable to them. Aircraft access is critical for hunting activity to be practical and effective.

That concludes our submission. Thank you for the opportunity to do so. It is not our intention to appear and speak in support of this submission but we welcome any points of clarification and can provide further information and comment if required.

Yours faithfully

Murray Burns

SECRETARY

Cathie Brumley

From: Bill King
Sent: Wednesday, 30 January 2019 11:07 a.m.
To: aorakinp
Subject: Aoraki Mt Cook National Park Management Plan Submission
Attachments: CMC_AMCNP_MP_Submission-2019.pdf

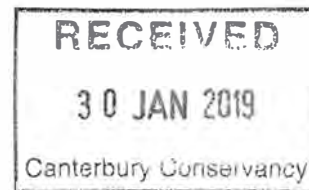
Categories: Orange Category

William King

Christchurch

30th January 2019

Aoraki/Mount Cook NPMP Submissions
Department of Conservation
aorakinp@doc.govt.nz



Dear Sir or Madam

Submission on the Draft Aoraki/Mount Cook National Park Management Plan

Thank you for the opportunity to submit on the Draft National Park Management Plan for Aoraki/Mount Cook National Park (Draft Plan).

I do not wish to be heard in support of this submission.

Submission

I wish to support, in full, the submission by the Canterbury Mountaineering Club (CMC) on the Draft Plan.

In summary, I support the following four submission points made by the CMC:

1. Management of the CMC Wyn Irwin Lodge

I support the CMC's submission regarding the retention of Wyn Irwin Lodge in its current location, form, and management. In addition, I support the CMC's submission regarding the use of Wyn Irwin being available for Club members and for non-members where practicable, when not in use by club members and consistent with the purpose of the lodge.

Furthermore, I would like to see the incorrect statements removed regarding the siting of Wyn Irwin Lodge that have been included in the Draft Plan. These are identified in the CMC submission.

I would like to see clarification regarding what 'formal authorisations' are/is, and what 'departmental standards' are, as requested by the CMC's submission.

2. Vehicle access in the Park

I support the CMC's submission regarding proposed solutions to manage traffic congestion within Aoraki/Mount Cook National Park.

The Park and Ride concept may help to mitigate traffic congestion, but it cannot be at the expense of other user groups of Aoraki / Mount Cook National Park who will exit and arrive at the Park at hours outside of the operating hours of proposed Park and Ride. Vehicle access should be maintained for those intending to access Aoraki/Mount Cook National Park overnight and longer. Back country adventurers, particularly mountaineers, climbers, back country walkers, and skiers/snowboarders by the nature of their activity need to be able to start (and finish) trips within the Park at hours that would fall outside any operating hours of the proposed Park and Ride system. If the long and proud tradition of mountaineering in Aoraki/Mount Cook National Park (for which it is internationally famous for) is to be maintained, it is important that this core tenement remains.

There are a number of alternative mechanisms outlined in the CMC submission that DOC should consider to help mitigate traffic congestion and allow freedom of movement for mountaineers, climbers, backcountry walkers, skiers/snowboarders and other similar user groups. I support these proposals put forward in the CMC submission.

3. Aircraft access within the Park

I support the CMC's submission which opposes the proposal in the Draft Plan to increase aircraft traffic and landing zones within Aoraki / Mount Cook National Park.

Increasing use of aircraft within Aoraki Mount Cook National Park will degrade the experience of many user groups within the Park and reduce tranquillity values within the Park. With heightened awareness regarding climate change and anthropogenic impacts on the environment, allowing an increase in aircraft traffic and aircraft access to areas of the Park which previously excluded aircraft (i.e. previously designated high tranquillity, remote areas), is not appropriate or consistent with New Zealand's climate change targets and commitments.

I support the CMC's submission on Hooker Valley remaining aircraft-free, except in case of emergencies requiring evacuation, predator control and scientific research. In addition, the Plan should reflect a stronger focus on preserving foot access to places within the Park outside the front country area. This will benefit the Park as a whole by encouraging more people to venture further into the Park, relieving pressure on front country resources while allowing more people to access the special, high tranquillity areas of the Park like the Hooker Valley.

I support the CMC's submission for the installation of a mid-valley hut (i.e. a replacement for Gardiner Hut) to make access to the head of the valley easier and safer as well as the ongoing maintenance of the Pudding Rock cables.

4. Other Matters

I support the CMC's submission regarding the proposed addition of the Liebig Range and the Godley Valleys to the Park and the World Heritage Area, provided that the Department of Conservation has the sufficient resources to administer these areas.

I also support the CMC's submission advocating for the existing use and access of the Liebig Range (i.e. Cass Valley) and the Godley Valley to allow for 4WD access along the established, unformed legal roads to these areas. I would like to see that these roads are formally identified and maintained to provide safer access to and from these areas, as well to reduce adverse impacts from vehicles in these areas. 4WD access is required in these areas not only to provide access, but also for the New Zealand Deerstalkers Association and the New Zealand Alpine Club as well as other groups, to administer their huts in these areas.

I have attached the CMC's submission with my submission for ease of reference. In accordance with the submission guidelines provided by the Department of Conservation, the CMC submission:

- outlines each of the changes sought
- details the full rationale for seeking these changes
- identifies the relevant sections of the Draft Plan
- outlines the proposed wording changes which would give effect to the changes sought.

Yours sincerely

William King

Submission Form

Draft Aoraki/Mount Cook National Park Management Plan



Once you have completed this form

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

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

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Submitter details:

Name of submitter
or contact person:

GARRY MANTELL

Organisation name:
(if on behalf of an organisation)

Postal address:

LINCOLN

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
- I do not wish to be heard in support of my submission
(tick one box)

Signature:

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

Submission:¹

Section: <i>Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</i>	Submission: <i>Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</i>	Decision sought: <i>State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:</i> <i>- if supporting: 'retain Policy X'</i> <i>- if opposing: 'delete Policy X'</i> <i>- if seeking changes 'reword Policy X to read (give suggested wording)</i>
1.2.3 Recreational Values	Support – Includes for recreational boating	Retain Recreational Values as they are as they provides for the opportunity and to experience all types of recreational boating within the park
1.3.1 General Management Bylaws 31 (ii)	Oppose – It is contrary to the recreational values of the plan which supports recreational boating. Use of powered watercraft is consistent with the outcomes planned for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place, and the proposed Park Additions. .	Delete Bylaw 31 (ii)
1.3.2 Additions to National Parks Policies 2 (a)	Oppose – Currently under the Mackenzie District Council District Plan and under the RMA which as a matter of NATIONAL IMPORTANCE provides for under Section 6 (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:	Delete Policy 2 (a)

Please continue on a separate sheet if required.



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

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Submitter details:

Name of submitter or contact person:	Roger Grant Baker
Organisation name: <i>(if on behalf of an organisation)</i>	
Postal address:	Christchurch
Telephone number: <i>(the best number to contact you on)</i>	
Email:	
<input type="checkbox"/> I wish to be heard in support of my submission (this means you can speak at a hearing)	
<input checked="" type="checkbox"/> I do not wish to be heard in support of my submission <i>(tick one box)</i>	
Signature: R G Baker	

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Submission:¹

<p>Section: Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</p>	<p>Submission: Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</p>	<p>Decision sought: State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example: - if supporting: 'retain Policy X' - if opposing: 'delete Policy X' - if seeking changes 'reword Policy X to read (give suggested wording)</p>
<p>1.2.3 Recreational Values (page 42)</p>	<p>SUPPORT – Includes recreational boating</p>	<p>RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park</p>
<p>1.3.1 General Management Bylaws 31 (ii) (page 59)</p>	<p>OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan. Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2.3 (Recreational Values)</p>	<p>DELETE - Bylaw 31 (ii)</p>
<p>1.3.2 Additions to National Parks Policies 2 (a) (page 60)</p>	<p>OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:</p>	<p>DELETE Policy 2 (a)</p>

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter
or contact person:

Sarah Bramhall

Organisation name:
(if on behalf of an organisation)

Jobnz

Postal address:

Ashburton

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
- I do not wish to be heard in support of my submission
(tick one box)

Signature: _____

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Section:

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Submission:

Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.

Decision sought:

State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:

- if supporting: 'retain Policy X'
- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

1.2.3
Recreational
Values
(page 42)

SUPPORT – Includes recreational boating

RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park

1.3.1 General
Management
Bylaws
31 (ii)
(page 59)

OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan.
Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2.3 (Recreational Values)

DELETE - Bylaw 31 (ii)

1.3.2
Additions to
National Parks
Policies
2 (a)
(page 60)

OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:

DELETE Policy 2 (a)

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter
or contact person:

Matt Richens

Organisation name:
(if on behalf of an organisation)

Postal address:

Chch

Telephone number:
(the best number to contact you on)

Email:

I wish to be heard in support of my submission (tick one box)
 I do not wish to be heard in support of my submission (tick one box)

Signature: *X*

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Submission:¹

Section:

Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.

Submission:

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Decision sought:

State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:

- if supporting: 'retain Policy X'
- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

1.2.3

Recreational Values

Support – Includes for recreational boating

Retain Recreational Values as they are as they provides for the opportunity and to experience all types of recreational boating within the park

1.3.1 General Management

Bylaws

31 (ii)

Oppose – It is contrary to the recreational values of the plan which supports recreational boating. Use of powered watercraft is consistent with the outcomes planned for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place, and the proposed Park Additions. .

Delete Bylaw 31 (ii)

1.3.2

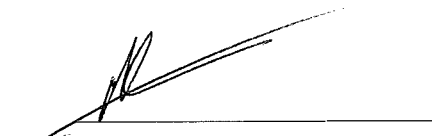
Additions to National Parks Policies

2 (a)

Oppose – Currently under the Mackenzie District Council District Plan and under the RMA which as a matter of NATIONAL IMPORTANCE provides for under Section 6 (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:

Delete Policy 2 (a)

Please continue on a separate sheet if required.



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Submissions must be received no later than 4.00 pm, Friday 9 November 2018

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Submitter details:

Name of submitter
or contact person:

Nina Dickerhof

Organisation name:
(if on behalf of an organisation)

n.a.

Postal address:

Christchurch

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
- I do not wish to be heard in support of my submission
(tick one box)

Signature:

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Submission:

General comments:

Pakeha also have a “culture” of engaging with the mountain environment of Aoraki/Mt Cook NP that shapes their identity and provides them with a sense of connectedness. Engaging with the mountains can take many forms and includes mountaineering, tramping, botanizing, photographing, sightseeing etc. Because recreational use of the park encompasses different activities, the best way to address different needs for different recreational users of the park is by applying the Recreation Opportunities Spectrum. In my view, the following points in the current draft concern the upkeep of this spectrum within the park:

<p>Section: Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</p>	<p>Submission: Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</p>	<p>Decision sought: State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example: - if supporting: ‘retain Policy X’ - if opposing: ‘delete Policy X’ - if seeking changes ‘reword Policy X to read (give suggested wording)’</p>
<p>Pg 45: “Aircraft are expected to become the main mechanism for recreation access around Aoraki over the life of this Plan as continuing glacial recession reduces the alternative means of access to him and his surroundings.”</p>	<p>While I believe that we need to be realistic about the impact of glacial recession and respecting the current trends that show that helicopter access is indeed favored over other forms of access, this wording seems to be a self-fulfilling prophecy and may detract from efforts to encourage foot access and thus sustainable access within the park.</p>	<p>Remove this sentence.</p>
<p>Pg.65 d)</p>	<p>I strongly oppose the opening of the Hooker Valley for Helicopter Landings. Keeping the Hooker free of helicopters protects a corner of the park for the “remoteness seeking” end of the recreation spectrum.</p>	<p>Remove Hooker Valley from this bullet point.</p>
<p>Pg. 131 “developing additional tracks around the lake and lake outlet, including a bridge, to provide access into the lower Murchison valley”</p>	<p>I am in favour of the bridge across the Tasman River to access the Murchison valley. Currently, apart from the front county, there aren’t many backcountry opportunities within the park. The bridge would be a great way to encourage foot access in the park and taking pressure of the need for helicopter usage to access climbing areas. This would also make the Alps to Ocean trail more sustainable removing the need for helicopter usage.</p>	<p>Retain this bullet point.</p>

Pg. 94 Discussion point "Park&Ride" System

Foot access is impeded by the currently proposed Park and Ride System. While I support the allowance made for bike access, I would like to the draft to specifically mention that access for trampers and climbers that want to access or exit the mountains as part of a multiday trip or a trip beyond the present road end can do so at any time. Ideally this would be by having the road open outside the bus' operating hours. Alternatively, clock-round access could be accomplished by having a gate with a key-pad lock and the code could be obtained from DOC or Alpine Clubs. A NZ driver's license number could be provided in order to obtain the code to prevent creating a loophole for day visitors. Alternatively, a carpark could still be maintained at the present carpark, at which parking is only allowed with a "parking permit", which is checked during the day by Park Staff and fined should it be absent. The parking permit can be obtained from DOC similar to a backcountry hut pass with a FMC membership card or NZ driver's license. This could even be issued against an annual fee that discourages "one time" users of the carpark to obtain such.

Include statements about how access for people wanting to enter the park outside the bus timetable is guaranteed.

P 54. Policies
d) *Cultural safety*

What is cultural safety? This wording seems too general and leans itself to a broad interpretation suggesting that access to the park can be closed or restricted for a variety of reasons that could fall under 'cultural safety'.

Define cultural safety or remove.

Pg.110 g) *“promote the use of sustainable design, practices, materials and services, including considering project life cycle costs where this will contribute to reducing the environmental footprint and improving the sustainability of the Village.”*

Pg 49 *“Promote the principles of ‘Leave No Trace’ and foster a culture of sustainable recreation practices in Aoraki/Mount Cook National Park.”*

Pg 45: *“Aircraft are expected to become the main mechanism for recreation access around Aoraki over the life of this Plan as continuing glacial recession reduces the alternative means of access to him and his surroundings.”*

Statements like *“Fostering a culture of sustainable recreation”* and *“promoting the use of sustainable practices and services”* stand in direct contrast with the statement on Pg. 45 about helicopter access and allowing helicopter flights up the Hooker Valley. ‘Leave no trace’ – this should encompass noise pollution caused by helicopters.

In summary, the current plan strongly favors access for people associated with commercial activities, such as staying at the Hermitage or flying into the park and should better cater for people accessing by foot. The latter would be in line with the plan’s intention to foster “a culture of sustainable” recreation.

Submission Form

Draft Aoraki/Mount Cook National Park Management Plan



Once you have completed this form

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

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

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Submitter details:

Name of submitter
or contact person:

Aleck Hau

Organisation name:
(if on behalf of an organisation)

Postal address:

Chch

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
- I do not wish to be heard in support of my submission
(tick one box)

Signature:

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

Submission:¹

Section:

Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.

Submission:

Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.

Decision sought:

State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:

- if supporting: 'retain Policy X'
- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

1.2.3

Recreational Values

Support – Includes for recreational boating

Retain Recreational Values as they are as they provides for the opportunity and to experience all types of recreational boating within the park

1.3.1 General Management

Bylaws

31 (ii)

Oppose – It is contrary to the recreational values of the plan which supports recreational boating. Use of powered watercraft is consistent with the outcomes planned for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place, and the proposed Park Additions. .

Delete Bylaw 31 (ii)

1.3.2

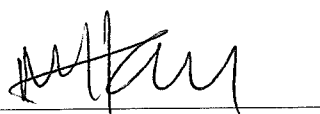
Additions to National Parks Policies

2 (a)

Oppose – Currently under the Mackenzie District Council District Plan and under the RMA which as a matter of NATIONAL IMPORTANCE provides for under Section 6 (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:

Delete Policy 2 (a)

Please continue on a separate sheet if required.



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

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Submitter details:

Name of submitter or contact person:	Simon James Bradshaw
Organisation name: <i>(if on behalf of an organisation)</i>	
Postal address:	Christchurch
Telephone number: <i>(the best number to contact you on)</i>	
Email:	<input type="text"/>

- I wish to be heard in support of my submission (this means you can speak at a hearing)
- I do not wish to be heard in support of my submission
(tick one box)

Signature:

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Submission:

Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.

Decision sought:

State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:

- if supporting: 'retain Policy X'
- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

Section 1.3.1	Oppose the closing of unformed roads identified in table 4 and indicated on map 6. These roads are Godley River and Birch Hill. This provides access for recreational users.	Delete policy 1 - Seek to stop or close the following unformed roads identified in Table 4.1 and on Map 6 and add them to Aoraki/Mount Cook National Park to enable integrated management of the Park.
Section 2.3.3	Oppose additional landings. Huge increase in aircraft landings which only causes faster melting of the glaciers (fossil fuel burning) and awful noise pollution. The 'tranquility' will be massively damaged, and this is a term they use over and over again in the proposal, saying the ideal is to 'maintain tranquility' in the park.	Delete policy 7 - Aircraft landings at tasman Glacier. They are proposing to increase landings to 200/day (73,000/year!) which is 15x the current 5000/year.
Section 2.4.3	Oppose additional landings. Huge increase in aircraft landings which only causes faster melting of the glaciers (fossil fuel burning) and awful noise pollution. The 'tranquility' will be massively damaged, and this is a term they use over and over again in the proposal, saying the ideal is to 'maintain tranquility' in the park.	Policy 3 - Aircraft landings on Murchison Glacier proposed increase to 35/day (10,950/yr) which is also a lot.

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Submitter details:

Name of submitter or contact person:	Ben Scott
Organisation name: <i>(if on behalf of an organisation)</i>	N/A
Postal address:	Christchurch
Telephone number: <i>(the best number to contact you on)</i>	
Email:	
<input type="checkbox"/> I wish to be heard in support of my submission (this means you can speak at a hearing)	
<input checked="" type="checkbox"/> I do not wish to be heard in support of my submission <i>(tick one box)</i>	

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Ben Scott
Christchurch,

4th February 2019

Aoraki/Mount Cook NPMP Submissions
Department of Conservation
aorakinp@doc.govt.nz

Dear Sir / Madam,

I wish to support, in full, the submission by the Canterbury Mountaineering Club (CMC) on the Draft Plan for Aoraki/Mount Cook National Park. In summary, I support the following four submission points made by the CMC:

1. Management of the CMC Wyn Irwin Lodge

I support the CMC's submission regarding the retention of Wyn Irwin Lodge in its current location, form, and management. In addition, I support the CMC's submission regarding the use of Wyn Irwin being available for Club members and for non-members where practicable, when not in use by club members and consistent with the purpose of the lodge.

Furthermore, I would like to see the incorrect statements removed regarding the siting of Wyn Irwin Lodge that have been included in the Draft Plan. These are identified in the CMC submission.

I also seek clarification regarding what 'formal authorisations' are/is, and what 'departmental standards' are, as requested by the CMC's submission.

2. Vehicle access in the Park

I support the CMC's submission regarding proposed solutions to manage traffic congestion within Aoraki/Mount Cook National Park.

The Park and Ride concept may help to mitigate traffic congestion, but it cannot be at the expense of other user groups of Aoraki / Mount Cook National Park who will exit and arrive at the Park at hours outside of the operating hours of proposed Park and Ride. Vehicle access should be maintained for those intending to access Aoraki/Mount Cook National Park overnight and longer. Back country adventurers, particularly mountaineers, climbers, back country walkers, and skiers/snowboarders by the nature of their activity need to be able to start (and finish) trips within the Park at hours that would fall outside any operating hours of the proposed Park and Ride system. If the long and proud tradition of mountaineering in Aoraki/Mount Cook National Park (for which it is internationally famous for) is to be maintained, it is important that this core tenement remains.

There are a number of alternative mechanisms outlined in the CMC submission that DOC should consider to help mitigate traffic congestion and allow freedom of movement for mountaineers, climbers, backcountry walkers, skiers/snowboarders and other similar user groups. I support the proposals put forward in the CMC submission.

3. Aircraft access within the Park

I support the CMC's submission which opposes the proposal in the Draft Plan to increase aircraft traffic and landing zones within Aoraki / Mount Cook National Park.

Increasing use of aircraft within Aoraki Mount Cook National Park will degrade the experience of many user groups within the Park and reduce tranquillity values within the Park. With heightened awareness regarding climate change and anthropogenic impacts on the environment, allowing an increase in aircraft traffic and aircraft access to areas of the Park which previously excluded aircraft (i.e. previously designated high tranquillity, remote areas), is not appropriate or consistent with New Zealand's climate change targets and commitments.

I support the CMC's submission on Hooker Valley remaining aircraft-free, except in case of emergencies requiring evacuation, predator control and scientific research. In addition, the Plan should reflect a stronger focus on preserving foot access to places within the Park outside the front country area. This will benefit the Park as a whole by encouraging more people to venture further into the Park, relieving pressure on front country resources while allowing more people to access the special, high tranquillity areas of the Park like the Hooker Valley.

I support the CMC's submission for the installation of a mid-valley hut (i.e. a replacement for Gardiner Hut) to make access to the head of the valley easier and safer as well as the ongoing maintenance of the Pudding Rock cables.

4. Other Matters

I support the CMC's submission regarding the proposed addition of the Liebig Range and the Godley Valleys to the Park and the World Heritage Area, provided that the Department of Conservation has the sufficient resources to administer these areas.

I also support the CMC's submission advocating for the existing use and access of the Liebig Range (i.e. Cass Valley) and the Godley Valley to allow for 4WD access along the established, unformed legal roads to these areas. I would like to see that these roads are formally identified and maintained to provide safer access to and from these areas, as well to reduce adverse impacts from vehicles in these areas. 4WD access is required in these areas not only to provide access, but also for the New Zealand Deerstalkers Association and the New Zealand Alpine Club as well as other groups, to administer their huts in these areas.

In accordance with the submission guidelines provided by the Department of Conservation, the CMC submission:

- outlines each of the changes sought
- details the full rationale for seeking these changes
- identifies the relevant sections of the Draft Plan
- outlines the proposed wording changes which would give effect to the changes sought.

I have attached the CMC's submission at the end of my submission for ease of reference. I have also included an additional personal submission point as tranquillity is a manipulatable metric and so should not be used as a measurable outcome to potentially (and I would wager almost definitely) allow further expansion of aircraft access.

Yours sincerely,

Ben Scott

Submission:

Section:	Submission:	Decision sought:
3.2.2 p73	<p>Disagree with the aggressive expansion of allowable landing zones and aircraft numbers in the National Park. Is there not enough helicopter traffic already? Maybe the focus should be on developing alternatives to glacier-based tourism.</p> <p>Focusing on the monitoring of tranquillity as a measurable outcome is also too ambiguous and open to personal or commercial interpretation as required by whoever wants to bend it to their advantage. The wording in the plan even allows for this by allowing “additional landings at some or all designated landing zones” if tranquillity outcomes are being achieved. How is this going to be monitored? This a very slippery slope and a brazen inclusion in the plan.</p>	<p>Modify as required to keep flight concessions as they are in the current plan.</p> <p>Delete 12) “If the monitoring shows” section. Tranquillity should not be a measurable performance criterion of the aircraft policy as it is a metric that can be influenced as desired.</p>



Canterbury Mountaineering Club
Christchurch

4 February 2019

Email:

Department of Conservation

Private Bag 4715

Christchurch Mail Centre

Christchurch 8140

Dear Sir / Madam

Submission from the Canterbury Mountaineering Club on the draft Aoraki / Mount Cook National Park Management Plan

1. Introduction

The Canterbury Mountaineering Club ("**CMC**") welcomes the opportunity to provide this submission on the draft Aoraki/Mount Cook National Park Management Plan ("**The Plan**" or "**The draft Plan**").

The CMC provided pre-consultation feedback to DOC in October 2016 in advance of The Plan review process being initiated. At that stage the CMC was not aware of the scope of proposed changes to The Plan, and certainly was not aware of the significant potential impact to the CMC as a club, or to the threat to the future of the sport of Mountaineering as we know it in Aoraki / Mt Cook National Park.

In July 2018 the Department of Conservation ("**DOC**") met with members of the CMC Committee in Christchurch to discuss possible implications to the CMC of the impending draft plan. It was during this meeting that the CMC was briefed on the possible threat to CMC interests in Aoraki / Mt Cook National Park, and the risk to access, safety and the practicalities of future mountaineering in Aoraki / Mt Cook National Park, not to mention some concerning precedent-setting notions that the CMC believes the draft Plan contains.

Following the July 2018 meeting the CMC was given one week to respond to the proposals outlined during the meeting. The CMC submitted a letter to DOC, dated 17 July 2017, outlining the concerns held by the CMC.

To make it clear, the CMC has a strong interest in several sections of The Plan, and sees the current wording as having material threats on the ability of climbers and mountaineers, including CMC members to safely and practically practice the sport of mountaineering in Aoraki / Mt Cook National Park.

The CMC appreciates that DOC is having to deal with a rapid rise in campervan and car visitations caused primarily by a very significant increase in overseas tourists. The CMC does not, however, accept that the activities of CMC members, or indeed the broader

backcountry mountaineering community contribute to the issues which DOC is attempting to manage by way of measures that will have an unfair and material impact on this comparatively small and low-impact group. Conversely, the draft plan has the potential to cause considerable impacts on CMC members and the backcountry mountaineering and climbing community.

It is important that the draft Aoraki / Mount Cook National Plan reflects the purpose of the Park as stated in the opening paragraph of section 4 of the National Parks Act 1980:

“For Parks to be maintained in natural state, and public to have right of entry, it is hereby declared that the provisions of this Act shall have effect for the purpose of preserving in perpetuity as national parks, for their intrinsic worth and for the benefit, use, and enjoyment of the public, areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest”.

2. Background to the CMC

The CMC was formed on the 10th April 1925 with a membership base of around 27 adventurers. The original aims of the Club have been maintained since this time – *the encouragement of a love for the mountains and nature, with increased facilities for enjoying the beauties that lie in the heart of the ranges.*

During the 1930s to 1950s CMC members contributed significantly to the backcountry/mountaineering access in Canterbury that so many enjoy today. Huts were built in the Arthurs Pass, Rakaia, Rangitata and Mount Cook regions, and climbing and exploration in these areas became very popular with members. During this time, a number of famous names were on the membership roll. It is worth noting that the CMC built the original Empress Hut and helped fund the current Empress Hut. In return, club members can use the hut free of charge.

Today, the CMC is a very active club for climbers, including alpine, sport and rock climbers, and increasingly, ski and snowboarding mountaineering, and has approximately 350 members. The club runs instruction courses, events, publications, and seminars for its members and the general climbing community.

The network of mountain huts and lodges that the CMC has been involved with for the last 93 years get regular maintenance, so that present and future generations of mountaineers can enjoy the alps.

3. Background to the CMC’s interest in the Aoraki/Mt Cook National Park Management Plan

The Canterbury Mountaineering Club retains a strong interest in the Aoraki/Mt Cook National Park (“**The Park**”) both from a historical perspective and the extensive mountaineering, climbing, backcountry walking and skiing opportunities that The Park provides.

The CMC has historically been actively involved with establishing and maintaining huts in The Park, building Wyn Irwin lodge in 1954, the original Empress Hut in 1954 and the Three Johns Hut in 1958. The CMC is privileged to have the Wyn Irwin lodge as a base in the park from which to undertake activities in the mountains.

The CMC runs intermediate and advanced mountaineering instruction courses in The Park using Wyn Irwin lodge as a base from which courses are led. In addition, the CMC also runs

club climbing trips in The Park which also use Wyn Irwin Lodge as a base. This provides an opportunity for CMC members to experience the alpine environment of The Park. The CMC also welcomes non-members, recreational groups, and outdoor education groups who to use Wyn Irwin as a base when they are undertaking activities in The Park where these activities align with the purpose of the Lodge.

The CMC seeks a plan which encourages and allows for continued sustainable, safe, and practical access and use of The Park, as well as the protection and enhancement of The Park's existing unique characteristics, including the wilderness areas, biodiversity and cultural significance.

The CMC has detailed its specific submission points on the proposed Draft Plan in section 5, in addition to other matters detailed in section 4.

The CMC wishes to be heard in support of this submission.

4. Other Matters

Park User Groups

The draft Plan diminishes backcountry use of The Park, and the role that backcountry users have played in the development of the Park. The draft plan does not appear to define the key visitors the plan provides for but it appears that its main focus is on front country visitors. The previous plan provided definitions for the different users (i.e. distinguishing between day visitors and backcountry adventurers (mountaineering, climbing and backcountry walking)). The CMC would like DOC to include user group definitions that highlight the multiple interest groups that visit the various regions of the Park. The CMC would reiterate firmly to DOC that Mountaineering and Climbing in Aoraki / Mt Cook National Park is an important and historical part of New Zealand's identity and culture. The Park was the location of Sir Edmund Hillary's first summit, who then went onto become one of the most famous and well-known New Zealander's globally. It is important that the Plan does not prevent future potential mountaineers, climbers and explorers to use the Park to reach their potential, as Sir Edmund Hillary did.

Backcountry Huts

The mountain huts of The Park offer significant historical and practical value. Many times weary backcountry walkers and mountaineers have found shelter within the safety of a basic mountain hut. Huts and shelters are essential for safety in The Park. The CMC recognises that the number of visitors to the park is increasing, yet the number of huts in the backcountry and higher alpine areas are depleting.

The CMC has not identified any parts of the Park Plan that details the installation of new huts or the maintenance of existing backcountry huts in detail. With climate change, access may potentially become more difficult in some areas, but similarly could become easier in other areas. Consequently, the CMC promotes the idea of simple, relocatable shelters of up to 6 to 8 people.

With climate change, access and safety considerations continually evolving, it will be important to consider relocating or building additional hut facilities to meet the needs and ensure the safety of backcountry users.

The CMC supports the maintenance and / or relocation of huts for historical reasons as well as for access and safety. The CMC seeks a mechanism to enable the consideration, planning and building of new/replacement huts in the backcountry. This process should include the

identification of appropriate sites (taking various considerations into account – access, safety, environment etc.). An example of this is the Hooker Valley where the absence of the Gardiner Hut has made access up the valley difficult and even dangerous for the majority of parties in this valley.

Recent discussions regarding a hut mid-way up the Tasman appear to be resolving similar issues in this valley and the CMC believe that this should be encouraged for other areas such as the Hooker Valley where climate change, erosion etc. are making access more difficult.

The CMC does not believe that huts should be bookable as this goes against New Zealand tramping and mountaineering tradition – no one should be turned away as this can pose a safety concern for backcountry users and is seen by the CMC as an erosion of traditional Kiwi recreational values.

Search and Rescue

The CMC supports and greatly appreciates the services provided by Search and Rescue. The CMC takes the view that the most cost effective and response-efficient system is to have a core of SAR staff based at Mt. Cook village. In addition, general management of The Park will always require personnel who have specific mountain skills that allow them to live, work and travel in high alpine conditions and that these skills can also be employed in Search and Rescue.

5. Concluding Remarks

We thank you for this opportunity to make this submission and we look forward to reinforcing our submission points during hearings on the draft plan.

Yours sincerely

George Gerard

President

Canterbury Mountaineering Club



6. Specific Submission points

The following table notes the CMC's specific submission points as they relate to The draft Plan. Requested additions to wording are underlined, and suggested deletions are in ~~strikethrough~~.

Section	Submission	Relief Sought
<p>Section 1.2.2 – Historic and Cultural Heritage; page 37</p>	<p>Page 37 states: <i>“Due to the Park’s new-found fame as the premier climbing destination in New Zealand, many more permanent structures were erected around Aoraki from the 1950s onwards, including homesteads, hotels, and climbing huts. Few of these have survived the intervening years or effects of fire, wind, flood and ground instability”</i>.</p> <p>Wyn Irwin Lodge was constructed in 1954 by CMC members to provide a base for members undertaking mountaineering and climbing pursuits within the Park. While improvements to the building have been undertaken during the intervening years, the original structure of the hut remains. The CMC would like to see Wyn Irwin recognised as one of the few remaining original climbing / mountaineering lodges within the Park, especially given that the proposed Plan acknowledges that few of the original huts/lodges now remain.</p> <p>Wyn Irwin has been the base lodge for a number of historically significant ascents/descents in the Park including the first ascent of the Caroline Face of Aoraki/Mt Cook by Peter Gough and John Glasgow, Guy McKinnon’s solo climbs of all the peaks in the Park higher than 3000 m, and more recently the first ski descent of the Caroline Face by Enrico Masetti, Ben Briggs and Tom Grant. These events plus many others are what make Wyn Irwin Lodge contribute to a unique part of Kiwi identity.</p>	<p>The CMC seek a wording change to this section of the Plan to include Wyn Irwin Lodge so it is recognised as a building with historic significance and one of the few remaining original structures within the Park. The CMC would like an additional sentence added to page 37 that reads: “Wyn Irwin Lodge, maintained by CMC was constructed as a base lodge for climbers and mountaineers in 1954 and is still actively used by members”.</p> <p>To share the historical significance of Wyn Irwin Lodge within the Park, CMC propose to provide an information panel displaying photographs and descriptions of the hut at the Whitehorse Campground carpark for all New Zealanders and tourists to view. This will contribute towards “telling the story about kiwi identity” as DOC and the Ministry for Culture and Heritage seek to do as described in paragraph 3, page 38.</p>

	<p>It is noted that Wyn Irwin Lodge is maintained at the sole cost of the CMC and provides a piece of climbing history within the Park.</p>	
<p>Section 1.2.4 – Engagement Values (Community Engagement)</p>	<p>Page 50 states <i>“There are many community groups, charitable organisations and individuals interested in the general wellbeing and protection of Aoraki and wider home of his whānau, such as the Royal Forest and Bird Protection Society, Federated Mountain Clubs, New Zealand Alpine Club, philanthropic interests and local community groups....”</i>.</p> <p>The CMC have a long history and interest in the Park that continues to this day. The CMC would like to be acknowledged as an interested party with respect to the general wellbeing and protection of Aoraki and wider home of his whanau.</p>	<p>The CMC would like to see a re-wording of this section of the Draft Plan to read:</p> <p><i>“There are many community groups, charitable organisations and individuals interested in the general wellbeing and protection of Aoraki and wider home of his whānau, such as the Royal Forest and Bird Protection Society, Federated Mountain Clubs, <u>Canterbury Mountaineering Club</u>, New Zealand Alpine Club, philanthropic interests and local community groups....”</i>.</p>
<p>Section 1.3.1 – General Management, Policy 14</p>	<p>Page 57 states: <i>“Retain the club lodges identified in Table 3 and on Map 9 within the Park through formal authorisations, and subject to:</i></p> <ul style="list-style-type: none"> <i>a) the club having a direct association with and undertaking activities in the Park;</i> <i>b) the building being maintained to Departmental standards for buildings;</i> <i>c) occupancy being maximised;</i> <i>d) the lodge being available for use by the public when not in use by club members; and</i> <i>e) consistency with 2.1.3 Policy 16”</i>. <p>Throughout the Plan, ‘formal authorisations’ are discussed, but no clarification is provided regarding what this means or involves. During the last two years, the CMC has spent more than \$80,000 on maintenance and improvements to Wyn Irwin Lodge to make it more comfortable and self-sufficient while retaining the original character and structure of the building. The purpose of Wyn Irwin when CMC built the lodge was to provide a base for outdoor recreationalists who were part of the club; specifically mountaineers, climbers, skiers, backcountry walkers</p> 	<p>The CMC would like page 57 to be re-worded as follows:</p> <p><i>‘Retain the club lodges identified in Table 3 and on Map 9 within the Park through formal authorisations, and subject to:</i></p> <ul style="list-style-type: none"> <i>a) the club having a direct association with and undertaking activities in the Park;</i> <i>b) the building being maintained to Departmental standards for buildings;</i> <i>c) occupancy being maximised <u>where practicable and consistent with the purpose of the lodge and a);</u></i> <i>d) the lodge being available for use by the public <u>non-members where practicable, when not in use by club members and consistent with the purpose of the lodge and a); and</u></i>

	<p>and outdoor education groups. Since its construction, Wyn Irwin Lodge has been used specifically for this purpose, as described in the CMC’s policy regarding its club lodges. The suggestion in the Plan that Wyn Irwin should be used as accommodation for the general public would not be consistent with club policy or its original purpose for being in the Park. The CMC Lodges Policy always allows for the club lodges (including Wyn Irwin Lodge) to be used by its members. Non-members may stay at CMC Lodges provided that they are mountaineers, skiers, climbers, outdoor education groups and/or backcountry walkers. Therefore, non-members staying at Wyn Irwin must be undertaking mountaineering, skiing, climbing and/or backcountry walking activities within the Park. In addition to the above, Wyn Irwin was also built to provide a base for members undertaking the activities described above as well as providing accommodation for older CMC club members who are unable to venture into the backcountry.</p> <p>The CMC have 8 backcountry huts throughout Canterbury backcountry which are located on range of land tenures, including National Parks and other conservation lands and are available for use by the public on a first come basis.</p> <p>It should be noted that the CMC makes Wyn Irwin available for non-member groups such as outdoor education groups and schools looking to use the lodge as a base for their courses and introduce the next generation of New Zealanders to safely experience the mountains and backcountry areas of the Park. The CMC offers the accommodation at Wyn Irwin for these groups at reduced cost to make these courses accessible as accommodation elsewhere in the Park would be too expensive or not available (i.e. full).</p>	<p><i>e) consistency with 2.1.3 Policy 16.’</i></p> <p>The CMC would like clarification regarding what ‘<i>formal authorisations</i>’ entails and made clear in the Plan as the draft Plan does not currently provide this. The current plan contemplates a concession being required for club lodges, and it is not clear if DOC is seeking through the Draft Plan to invoke this as a requirement. We note that Wyn Irwin has been in its current place for 60 years and has not changed in footprint or design in that time. Use of the lodge has remained largely constant throughout its existence. While we accept that DOC will from time to time review its concession arrangements, the CMC oppose any concession requirements on Wyn Irwin Lodge. Imposing concessions for the use and maintenance of Wyn Irwin lodge would likely create a financial burden that the CMC would oppose.</p> <p>The CMC would also like the Plan to clarify what ‘departmental standards’ are in respect to buildings, and to consult with the CMC in regards to the practicality of achieving these standards and their appropriateness.</p>
<p>Section 1.3.3 Aircraft Hooker Valley aircraft landing zone</p>	<p>The CMC supports the control of aircraft in the Park as provided for in the current Plan. However, the CMC does not support provisions to increase aircraft traffic within the Park above what is currently provided for. Increasing use of aircraft within the Park will degrade the experience of other user groups within the Park and reduce tranquillity values within the Park. With heightened awareness regarding climate change and anthropogenic impacts on the environment, allowing an increase in aircraft traffic and aircraft access to areas</p>	<p>The CMC advocates for the Hooker Valley to remain aircraft free, except in case of emergencies requiring evacuation, predator control and scientific research. The CMC would like the draft Plan altered to reflect this. In addition, the CMC would like the Plan to reflect a stronger focus on preserving foot access to places within the Park outside the front country area. This will benefit</p>

	<p>of the Park which previously excluded aircraft, is not considered appropriate or consistent with New Zealand’s climate change targets and commitments.</p> <ul style="list-style-type: none">• Moves to increase total aircraft activity should be avoided, or well managed to ensure there are areas that remain devoid of air traffic (i.e. areas classified as “Remote Areas”) unless required for scientific research, predator control and for search and rescue.• Where foot access is an issue for areas of the Park such as the Hooker Valley, additional huts should be built (i.e. a replacement to the Gardiner Hut in the Hooker Valley) along with increased maintenance of tracks and access aids (such as increased maintenance of the Pudding Rock cables). This will encourage increased foot access to these areas of Park and maintain the existing tranquillity of these areas. Increasing aircraft traffic and introducing aircraft to areas which previously did not have any aircraft traffic will degrade the existing tranquillity values of that area.• Better jurisdiction is required to ensure that commercial aircraft operators remain within their flight boundaries. It is not unheard of for scenic tourist flights to fly through wilderness areas and CMC members regularly see operators breaching civil aviation rules by flying at low levels across Harper Saddle in the Hooker Valley. In addition, irregular tourist scenic flights flying close around the Sheila Face of Aoraki cause severe noise and vibration issues creating potential hazards and distraction to climbers in the area.• There appears to be some uncertainty regarding landing sites for heli-ski operators in The Park. Areas where heli-ski operators have been observed landing do not correspond with ‘designated landing sites’. The CMC would like to see better transparency regarding this and whether this practice is allowed for in the heli-ski operator’s concessions. <p>A survey of CMC members on air access resulted in 67% opposing an additional landing zone in the Aroaroahaeke Place. 43 members replied to this survey.</p>	<p>the Park as a whole by encouraging more people to venture further into the Park, relieving pressure on front country resources while allowing more people to access the special, high tranquillity areas of the Park like the Hooker Valley.</p> <p>The CMC advocate for the installation of a mid-valley hut to make access to the head of the valley easier and safer as well as the ongoing maintenance of the Pudding Rock cables. The CMC would like the Plan altered to include provision for this.</p>
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<p>Section 1.3.5 Bolts and Anchors; page 67</p>	<p>Bolting is synonymous with sport climbing and modern mountaineering. Bolting increases the margin of safety for climbers in areas that would otherwise be too difficult for and dangerous to climb. Bolting in The Park has allowed not only the establishment of new climbing areas (encouraging visitors to The Park) but also allowed increased access to areas of the Park that would be difficult without bolts (i.e. Pudding Rock cables). The CMC is supportive of the installation of bolts to increase access to more remote areas of the Park.</p> <p>The CMC is supportive of the use of NZAC’s <i>“Position on Bolting”</i> and <i>“Bolting Technical Guidelines”</i>.</p>	<p>The CMC supports the provision for bolting and the maintenance of existing bolts for climbing, mountaineering and access purposes in the Park.</p>
<p>Section 1.3.18 Milestones; General Management - Authorisations</p>	<p>Milestone 8 states: <i>“Formal authorisations for existing club lodges located in the Park have been put in place (Year 3).”</i> The Plan does not make it clear what formal authorisations are or what they entail.</p>	<p>The CMC would like clarification regarding what <i>‘formal authorisations’</i> entails and made clear in the Plan as the draft Plan does not currently provide this. The current plan contemplates a concession being required for club lodges, and it is not clear if DOC is seeking through the Draft Plan to invoke this as a requirement. We note that Wyn Irwin has been in its current place for 60 years and has not changed in footprint or design in that time. Use of the lodge has remained largely constant throughout its existence. While we accept that DOC will from time to time review its concession arrangements, the CMC would oppose any concession requirements for Wyn Irwin Lodge. Imposing concessions for the use and maintenance of Wyn Irwin lodge would likely create a financial burden that the CMC would oppose.</p>
<p>2.1.2 – Management Considerations (Club Lodges)</p>	<p>Page 91 (Club Lodges) states: <i>“These are managed differently from other huts in the Park in that club members have priority use of them. Public can book accommodation only when they are not otherwise being used. Under the previous Plan, this arrangement was extended to existing club lodges only – any new</i></p>	<p>The CMC would like the statement on Page 91 of the Plan to be re-worded to read: <i>“These are managed differently from other huts in the Park in that club members have priority use of them.</i></p>

application for a club lodge would need to apply for a site in the Village accommodation area. Clubs are expected to make full use of their existing lodges as a base for club activities. Where this is not the case – where facilities are not being regularly used through the year, or where the use is substantially for non-club activities – then the continued presence/location of the lodge should be reviewed.

Club lodges used for accommodation purposes now require authorisation from the Minister to ensure that the lodges and their activities are managed consistently with their purpose and with other structures in the Park.

The current location of the Tahr and Wyn Irwin lodges at White Horse Hill creates a number of issues that have limited the ability of the clubs to meet the requirements of the previous Plan for use of the facilities.

Providing water and sewerage facilities is problematic in a remote location and requires a high level of maintenance. The location near Foliage Hill creates a situation in winter where the lodges have limited sunlight and are very hard to keep warm, so they are not fully utilised over the colder months. Club use has varied over the years with non-club use contributing a significant portion. Being sited adjacent to the campground and parking area for White Horse Hill has created some issues with available parking space that have led to some confusion and tensions between people using the area. An investigation of future management options for these lodges would focus on providing year-round comfortable accommodation and the services required to achieve their required purpose within the Park.”

The CMC note that the above section from the Plan makes a number of baseless and incorrect assumptions regarding Wyn Irwin Lodge. To be clear, Wyn Irwin is sited in an ideal location for the purpose of the lodge. It provides easy access to the Hooker and Mueller areas, while being located in area that has high tranquillity away from the highly developed area of the village. This provides additional incentive for members to use the lodge. Contrary to the description from Page 91 of the Plan, Page 102 of the Plan contains a correct assessment that Wyn Irwin Lodge is well sited, stating: “Unwin, Wyn Irwin and Tahr Lodges are well sited to be used and valued by club members and the public year round”.

Booking of accommodation at the Lodges is possible Public can book accommodation only when they are not otherwise being used. ~~Under the previous Plan, this arrangement was extended to existing club lodges only – any new application for a club lodge would need to apply for a site in the Village accommodation area.~~ Clubs are expected to make full use of their existing lodges as a base for club activities. Where this is not the case – where facilities are not being regularly used through the year, or where the use is substantially for non-club activities or for the original purpose of the lodge – then the continued presence/location of the lodge should be reviewed.

Club lodges used for accommodation purposes now require authorisation from the Minister to ensure that the lodges and their activities are managed consistently with their purpose and with other structures in the Park.

~~The current location of the Tahr and Wyn Irwin lodges at White Horse Hill creates a number of issues that have limited the ability of the clubs to meet the requirements of the previous Plan for use of the facilities.~~

~~Providing water and sewerage facilities is problematic in a remote location and requires a high level of maintenance. The location near Foliage Hill creates a situation in winter where the lodges have limited sunlight and are very hard to keep warm, so they are not fully utilised over the colder months. Club use has varied over the years with non-club use contributing a significant~~

	<p>Furthermore, the location of the lodge was selected by the Park board and Park Ranger (Mick Bowie) as being a suitable site for the lodge for its purpose (mountaineering, climbing, backcountry walking etc) and also because the site faces north and receives adequate year-round sun, while being protected from southerly weather by Foliage Hill.</p> <p>Wyn Irwin Lodge is fully self-contained with an operational sewerage system (septic tank), is fully insulated and double glazed and has a self-contained solar power energy system providing off-grid electricity to the lodge. In addition to this, Wyn Irwin provides a year-round base for a full-time warden. The current warden has lived at the lodge for a number of years and can attest to the year-round comfort that the lodge provides.</p> <p>In recent years, an increase in tourist numbers has given rise to parking issues as a result of inadequate delineation of different Whitehorse Hill user groups. Some of the suggestions (i.e. <i>Discussion Box – Village and front country spatial plan, White Horse Hill Campground, v</i>.) will help to resolve these issues in particular having separate parking for Wyn Irwin Lodge users, in conjunction with adequate signage delineating parking for camp ground users, day visitors and club lodge users.</p> <p>The location of Wyn Irwin and the regular maintenance of Wyn Irwin Lodge by the CMC has resulted in a lodge that provides comfortable year-round accommodation and a climbing base for its members and non-members using the lodge for mountaineering, climbing, outdoor education and backcountry walking purposes.</p>	<p>portion. Being sited adjacent to the campground and parking area for White Horse Hill has created some issues with available parking space that have led to some confusion and tensions between people using the area. An investigation of future management options for these all lodges in the Park would focus on providing year-round comfortable accommodation and the services required to achieve their required purpose within the Park.”</p> <p>The CMC would support formal authorisation from the Minister for continued use of Wyn Irwin Lodge at its current site in perpetuity.</p>
<p>Section 2.1 Discussion Box; “Park & Ride and cycleways”; Page 94.</p>	<p>It is proposed to manage traffic within the Park during the peak seasons by the following:</p> <p><i>“i) Trial a Park & Ride public transport service from the Park entrance on a seasonal basis (during times of highest use) to determine its effectiveness for moving people quickly and efficiently around the Village and front country.</i></p>	<p>The CMC would like proposal iv on Page 94 of the Plan to be amended to read;</p> <p><i>“iv) Investigate options to remove all <u>day</u> visitor vehicle access to the Park during peak use seasons, <u>but</u> to allow for limited vehicle access with evidence of booked accommodation <u>or</u></i></p>

ii) Remove access for day visitor cars and campervans into the Park at times when a Park & Ride public transport system is operating.

iii) Provide a serviced area for day carparking and overnight campervan stays outside the Park entrance, in association with the Park & Ride public transport operation.

iv) Investigate options to remove all visitor vehicle access to the Park during peak use seasons, or to allow for limited vehicle access with evidence of booked accommodation.”

The CMC supports the Park and Ride service concept in principle with the caveat that vehicle access at any time is maintained for those intending to access the Park overnight and longer. Back country adventurers, particularly mountaineers, by the nature of their activity need to be able to start (and finish) trips within the Park at hours that would fall outside any operating hours of the proposed Park and Ride. If the long and proud tradition of mountaineering in Aoraki / Mount Cook National Park (for which it is internationally famous for) is to be maintained this core tenement for mountaineers and skiers, climbers and backcountry walkers must be maintained.

There is also the potential for basic unfairness that those with booked accommodation, such as those staying in the Hermitage, can drive to their final destination but those wishing to go to the road end or stay in a Club Lodge without evidence of booking may not be allowed to take their vehicles.

Page 86 states that “*Kāi Tahu have a strong belief that the Village itself should not be a destination. Rather, it should function only as an outpost that provides the amenities needed for visitors to venture into the Park itself and experience the mana and beauty of those ancestors embodied by the mountains*”. As described in the previous paragraph, aspects of the Park and Ride discussion are inconsistent with this statement as it would restrict and dictate when and how the backcountry adventurers can access Aoraki/-Mount Cook National Park. Particularly, it will reduce the options available to explore and visit areas of the Park outside of Nohoaka Place.

for those accessing areas outside the front country who require afterhours access into and out of the Park .”

The challenge for DOC will be how to discern genuine backcountry users from day visitors. This can only be confirmed by the intentions of the visitor. It is suggested that those wishing to take their vehicles into the Park for the reasons above, sign in and complete an intentions statement at the Birch Hill Park entrance.

It appears that part of the issue in regard to vehicle and visitor numbers at the Whitehorse Hill area is related to the highly accessible walkways that allow visitors access to the views that make the Park famous (i.e. Hooker Lake and Mueller Hut tracks). However, nowhere else in the Nohoaka Place are there as accessible tracks and camping that provide visitors with an experience such as this. The Plan should focus on expanding the number of accessible walking tracks to spread visitor numbers throughout the Nohoaka Place and further into the other areas of the Park. This could be accomplished by building foot bridges over the Tasman and Murchison Rivers, providing a foot track to the east side of the Tasman valley and also into the Murchison Valley. This would also allow cycle users to link up the A20 Cycleway. Maintenance of the Ball Road (now known as the Ball Shelter Track) to an expanded Ball Hut would provide an additional hut for the public to stay, relieving pressure on Mueller Hut. Installing a track on the ridge at the Southern end of the Kirikirikatata / Mount Cook Range would allow

	<p>Page 89 states that <i>“Continuing to provide a high quality visitor experience for rapidly increasing numbers of people has been identified as the key issue for the management of the Village and accessible front country”</i>. The Park and Ride concept may help to mitigate this issue but cannot be at the expense of other user groups of the Park who will exit and arrive at the Park at hours outside of the operating hours of proposed Park and Ride.</p>	<p>visitor access up towards Mt Wakefield providing simultaneous views into the Tasman and Hooker Valleys.</p> <p>The CMC believe that these options would relieve pressure on White Horse Hill Carpark and encourage more visitors to venture elsewhere in the Park</p>
<p>Section 2.1 Discussion Box; “White Horse Hill Campground”; Page 96</p>	<p>Page 96 states: <i>“Proposed options to manage increasing people and vehicle use of this area (Hooker Road end) include:</i></p> <p><i>i) As an interim measure, provide separate areas for day visitor parking, campervan parking, and camper parking and create marked parking spaces. Create alternative/additional overnight parking for campervans elsewhere in the front country (proposed use of Wakefield Falls carpark in the Tasman valley).</i></p> <p><i>ii) Remove all day visitor car parking and campervan parking from White Horse Hill during the peak use seasons once access is available by Park & Ride public transport operation. A parking facility to be located outside the Park.</i></p> <p><i>iii) Clearly mark out camping sites and operate booking system. Develop landscaping to provide some privacy.</i></p> <p><i>iv) Signpost route to Hooker Valley Track to keep walkers away from the campground area.</i></p> <p><i>v) Maintain the club lodges’ parking area separate from the main campground carpark.”</i></p> <p>With the exception of ii), the CMC supports the proposed options to manage increasing numbers of people and vehicles at Whitehorse Hill. As per our previous submission point, the use of any “Park and Ride” system will greatly diminish users experience of the Park, by restricting and dictating when users can enter and move through the Park.</p>	<p>The CMC would like Page 96 reworded to read: <i>“Proposed options to manage increasing people and vehicle use of this area (Hooker Road end) include:</i></p> <p><i>i) As an interim measure, provide separate areas for day visitor parking, campervan parking, and camper parking and create marked parking spaces. Create alternative/additional overnight parking for campervans elsewhere in the front country (proposed use of Wakefield Falls carpark in the Tasman valley).</i></p> <p><i>ii) Remove all day visitor car parking and campervan parking from White Horse Hill during the peak use seasons once access is available by Park & Ride public transport operation. A parking facility to be located outside the Park. <u>Do not allow campervans to overnight at White Horse Hill.</u></i></p> <p><i>iii) Clearly mark out camping sites and operate booking system. Develop landscaping to provide some privacy.</i></p> <p><i>iv) Signpost route to Hooker Valley Track to keep walkers away from the campground area.</i></p>

	<p>Removal of campervans from over-nighting at Whitehorse Hill and expanding the vehicle parking area beyond Foliage Hill would help to reduce parking issues in this area of the Park.</p> <p>As per our previous submission point, development of other areas of the Park to provide more accessible walkways (i.e. foot bridges over the Tasman and Murchison Rivers to allow foot traffic into the lower Tasman and Murchison Valleys) would provide suitable attractions to help relieve some day and over night visitors. Development of a campground in the Tasman Valley would reduce strain on the resources at Whitehorse Hill and help to disperse visitor numbers.</p> <p>The CMC support free vehicle parking within the Park.</p>	<p><i>v) Maintain the club lodges' parking area separate from the main campground carpark.</i></p> <p><i>vi) <u>Expand the carpark at Whitehorse Hill beyond Foliage Hill to allow for increasing visitor numbers.</u></i></p> <p><i>vii) <u>Develop a campground and dedicated campervan overnighting area in the Tasman Valley and establishment of foot bridges and tracks in the Tasman and Murchison Valleys and other areas of the Park to allow visitor numbers to be more dispersed around the Park</u>.</i></p> <p><i>vi) <u>Tar seal the Tasman Road to encourage more users to travel to this area of the Park.</u></i></p>
<p>Section 2.1.3, Policy 11 (page 105)</p>	<p>Policy 11 states: <i>"Provide for the establishment of a Park entry facility at Birch Hill to administer vehicle entry and a Park & Ride public transport service and any other related services to be proposed."</i></p>	<p>Please see our two previous submission points regarding the "Park and Ride" proposal.</p>
<p>Section 2.1.3, Policy 16 (page 106)</p>	<p>Policy 16 states: <i>"Work with the Canterbury Mountaineering Club, the New Zealand Deerstalkers' Association and the New Zealand Alpine Club to develop options for the longterm effective management of their club lodges within the Park that meets the requirements for achieving authorisation."</i></p> <p>As per our previous submission points, "authorisation" is not defined in the Plan. What "authorisation" entails and what is required by the Clubs to achieve this needs to be made clear in the Plan.</p>	<p>The Plan should define what authorisation entails and what is required by the CMC for this to occur. The CMC would desire to be consulted on this matter. The CMC would support formal authorisation from the Minister for continued use of Wyn Irwin Lodge at its current site in perpetuity.</p>
<p>Section 2.1.3, Policy Milestone 10; Page 112.</p>	<p>Milestone 10 states: <i>"The management of Tahr, Wyn Irwin and Unwin lodges meets the requirements for authorisation of club lodges in the Park (Year 5).</i></p> <p>Milestone 13 states: <i>"Achieved authorisation for Tahr, Wyn Irwin and Unwin lodges (Year 6)."</i></p>	<p>The Plan needs to define what authorisation entails and what is required by the CMC for this to occur. The CMC would expect to be consulted on this matter. The CMC would support formal</p>

	<p>Timeframes are discussed for the implementation of “authorisation” but as per our previous submission points, “authorisation” is not defined in the Plan.</p> <p>Milestone 15, 16 and 18 refer to the “Park and Ride” proposal. The CMC reiterates that it does not support this as its implementation will adversely affect visitor experience in the Park for all user groups.</p>	<p>authorisation from the Minister for continued use of Wyn Irwin Lodge at its current site in perpetuity.</p> <p>Milestone 15, 16 and 18 (Page 10) should be removed from the Plan.</p>
<p><i>Section 2.2.2 Management considerations; Page 119.</i></p>	<p>The draft Plan proposes two new aircraft landing locations at Pudding Rock and at the Grand Plateau.</p> <p>The CMC supports the control of aircraft in the Park as provided for in the current Plan. The CMC does not support provisions to increase aircraft traffic within the Park above what is currently provided for. Increasing use of aircraft within the Park will degrade the experience of other user groups within the Park and reduce tranquillity values within the Park. With heightened awareness regarding climate change and anthropogenic impacts on the environment, allowing an increase in aircraft traffic and aircraft access to areas of the Park which previously excluded aircraft, is not considered appropriate or consistent with New Zealand’s climate change targets and commitments.</p> <p>It is noted that the Department is proposing to introduce these new landing zones to provide safe access to the backcountry area and to ascents of Aoraki/Mount Cook. Areas of the Park that are remote and difficult to access such as these places require specific skills to travel in and access these areas. The CMC questions whether the approach of allowing aircraft access to these areas is sensible if visitors would not ordinarily have the skills required to access these areas by foot. Introducing new and increased aircraft traffic movements is not considered a safe approach to increasing access to these areas.</p> <p>Those who currently access these areas do so specifically to get away from disruptive and distracting aircraft noise effects, and to experience the high tranquillity that these areas currently offer.</p>	<p>The CMC does not support the Plan as it is currently drafted regarding increasing aircraft traffic within the Park and allowing aircraft traffic to areas of the Park which previously did not allow any traffic.</p> <p>The CMC seeks that the Department maintains existing aircraft traffic provisions, as specified in the existing Plan. The CMC would like to see further investment in additional huts, tracks and access aids (e.g. Pudding Rock Cables etc).</p>
<p>Section 2.2.3 Policy 4; Page 122.</p>	<p>As per our previous submission point in regard to bolting and fixed anchors. The CMC supports the use of bolting and fixed anchors.</p>	<p>The CMC supports the provision for bolting and the maintenance of existing bolts for climbing, mountaineering and access purposes in the Park.</p>

<p>Section 2.2.3; Bylaw 13; Page 124.</p>	<p>Bylaw 13 states: <i>“After investigation, should seek to amend the Mount Cook National Park bylaws, if required, to provide for the following:</i></p> <ul style="list-style-type: none"> <i>a) require people who park, or leave parked, any vehicle at public carparks in the Aoraki/Mount Cook Village and at the Hooker valley and Tasman valley road ends, or at other formal or informal parking areas in this Place, to pay a daily or seasonal parking charge;</i> <i>b) require people to book before staying at huts other than the Hooker and Mueller Huts, where increasing demand is exceeding the capacity of the hut, and prohibit people from staying more than two consecutive nights.”</i> <p>The CMC sees Bylaw 13 proposal (a) as purely a revenue gathering exercise so opposes any moves to charge vehicle users for parking within the National Park. This proposal would penalise not only tourists, but all New Zealander’s who visit the Park and pay for its protection and access via their taxes.</p> <p>Requiring mountaineers, climbers and backcountry walkers to book to stay at backcountry huts (as proposed in Bylaw 13 b) is not practicable and is potentially unsafe. For mountaineers and backcountry adventurers, trip planning needs to be flexible to allow for unexpected changes in weather or conditions which may require them to use a hut unexpectedly or stay longer than two consecutive nights. In addition, requiring parties to book before staying also creates potential safety issues for mountaineers, climbers and back country walkers needing to unexpectedly use a hut that requires booking.</p> <p>Furthermore, a booking system for remote huts will also encourage tourist operators to blanket book huts to suit their commercial operations penalising private climbing parties.</p>	<p>The CMC would like Bylaw 13 to be removed in its entirety from the Plan.</p> <p><i>“After investigation, should seek to amend the Mount Cook National Park bylaws, if required, to provide for the following:</i></p> <ul style="list-style-type: none"> <i>a) require people who park, or leave parked, any vehicle at public carparks in the Aoraki/Mount Cook Village and at the Hooker valley and Tasman valley road ends, or at other formal or informal parking areas in this Place, to pay a daily or seasonal parking charge;</i> <i>b) require people to book before staying at huts other than the Hooker and Mueller Huts, where increasing demand is exceeding the capacity of the hut, and prohibit people from staying more than two consecutive nights.”</i>
<p>Section 2.3.2 Page 131.</p>	<p>As mentioned in our previous submission point, the CMC supports the control of aircraft in the Park as provided for in the current Plan. However, the CMC does not support provisions to increase aircraft traffic within the Park above what is currently provided for. Increasing use of aircraft within the Park will degrade the experience of other user groups within the Park and reduce tranquillity values within the Park. With heightened awareness regarding climate change and anthropogenic impacts on the environment, allowing an increase in aircraft</p>	<p>The CMC does not support the Plan as it is currently drafted regarding increasing aircraft traffic within the Park and allowing aircraft traffic to areas of the Park which previously did not allow any traffic.</p>

	<p>traffic and aircraft access to areas of the Park which previously excluded aircraft, is not considered appropriate or consistent with New Zealand’s climate change targets and commitments.</p> <ul style="list-style-type: none"> • Moves to increase total aircraft activity should be avoided, or well managed to ensure there are areas that remain devoid of air traffic (i.e. areas classified as “Remote Areas”) unless required for scientific research and for rescue/medical rescue. • Where foot access is an issue for areas of the Park (such as the Tasman Valley) additional huts should be built along with increased maintenance of tracks and access aids. This will encourage increased foot access to these areas of Park while maintaining the existing tranquillity of these areas. Increasing aircraft traffic and introducing aircraft to areas which previously did not have any aircraft traffic will degrade the existing tranquillity values of that area. • Better jurisdiction is required to ensure that commercial aircraft operators remain within their flight boundaries. • There appears to be some uncertainty regarding landing sites for heli-ski operators in The Park. Areas where heli-ski operators have been observed landing do not correspond with ‘designated landing sites’. The CMC would like to see better transparency regarding this and whether this practice is allowed for in the heli-ski operator’s concessions. 	<p>The CMC seeks that the Department maintains existing aircraft traffic provisions, as specified in the existing Plan. The CMC would like to see further investment in additional huts, tracks and access aids (e.g. Pudding Rock Cables, Tasman River and Murchison River footbridges etc).</p>
<p>Section 2.4.2. Page 141.</p>	<p>Section 2.4.2 of the draft Plan indicates the Department’s intentions to allow increased aircraft access to the Murchison and Liebig Ranges. The CMC supports maintaining existing aircraft provisions as laid out in the existing Plan. As previously mentioned, increasing aircraft traffic or allowing aircraft traffic to areas of the Park where there has previously been no traffic is not considered to consistent with New Zealand’s climate change targets and commitments.</p> <p>The CMC advocates for a footbridge across the Tasman River and Murchison Rivers to provide greater and easier access to these river valleys and also to the</p>	<p>As mentioned in our previous submission point, the CMC does not support the Plan as it is currently drafted regarding increasing aircraft traffic within the Park and allowing aircraft traffic to areas of the Park which previously did not allow any traffic.</p> <p>The CMC seeks that the Department maintains existing aircraft traffic provisions, as specified in the existing Plan. The CMC would like to see</p>

	<p>Liebig Range. An additional positive benefit, in the case of a Tasman River bridge, would be providing useful access for the A2O cycle way located on the true right bank of the Tasman River.</p>	<p>further investment in additional huts, tracks and access aids (e.g. bridges across the Tasman and Murchison Rivers and a foot track into the lower Murchison Valley).</p>
<p>Topic Paper: Potential Additions to Aoraki Mt Cook National Park and the World Heritage Area</p>	<p>The CMC supports the proposed addition of the areas to the Park and the World Heritage Area, provided that the Department has the sufficient resources to administer these areas. The addition of these areas should not be contingent upon additional or new funding being obtained from increased helicopter use or other concession activities within the existing Park or the proposed additional areas.</p> <p>The Liebig Range and the Godley Valleys are important to CMC members as they provide alternative entrances to the existing Park. These special areas also provide fantastic opportunities for climbing, mountaineering, backcountry walking and back country skiing. The Godley Valley is of particular importance to the CMC and its members as a number of first ascents of the peaks at the head of Valley were undertaken by CMC members, including founding member, William Kennedy.</p> <p>The CMC advocate for the existing use and access of the Liebig Range (i.e. Cass Valley) and the Godley Valley to allow for 4WD access along the established, unformed legal roads to these areas. The CMC suggests that these roads are formally identified and maintained to provide safer access to and from these areas and also to reduce adverse impacts from vehicles in these areas. 4WD access is required for these areas not only to provide access to these areas but also for the New Zealand Deerstalkers Association and the New Zealand Alpine Club as well as other groups, to administer their Huts in these areas.</p>	<p>The CMC supports the proposed inclusion of the additional areas to the Park and the World Heritage Area. This is under the proviso that the Department is able to administer these areas and not be reliant on new or additional funding from concessions in the Park or the proposed areas to do so.</p> <p>The CMC advocate for existing access and use of the Cass River and Godley River Valleys (including 4WD access) as it currently occurs. Additionally, the CMC would support the Department formally identifying and maintaining these roads to provide safer access to and from these areas and also to reduce adverse impacts from vehicles in these areas.</p>

Aaron Ford

Queenstown

29 January 2019

Aoraki/Mount Cook NPMP Submissions
Department of Conservation
aorakinp@doc.govt.nz

Dear Sir or Madam

Submission on the Draft Aoraki/Mount Cook National Park Management Plan

Thank you for the opportunity to submit on the Draft National Park Management Plan for Aoraki/Mount Cook National Park (Draft Plan).

I wish to be heard in support of this submission.

Submission (NZHGPA)

I wish to support, in full, the submission by the New Zealand Hang Gliding and Paragliding Association (NZHGPA) on the Draft Plan.

In summary, I support the following four submission points made by NZHGPA:

1. NZHGPA intends to apply for a global concession, with the assistance of the Federated Mountain Clubs of NZ (FMC), for NZHGPA pilots to take off and land on all public conservation land.

The new requirement in the Draft Plan to obtain a concession to launch from or land in Aoraki/Mount Cook National Park is a significant change, as the current Plan does not require hang gliders or paragliders to obtain a concession. We assume this change in policy is based on section 17ZF of the Conservation Act 1987. Although hang gliders have been flying in the park since 1970, hang gliders and paragliders were still relatively uncommon when the Act was passed. It is, therefore, highly unlikely that this requirement to gain a concession was ever intended to apply to recreational hang gliders and paragliders.

A global concession will ensure that hang gliding and paragliding pilots may continue to experience the joy of recreational flying in Aoraki/Mount Cook National Park and other conservation areas. This is a pragmatic solution to properly legitimise a situation which has gone on without scrutiny or opposition from the Department of Conservation for nearly 40 years.

2. NZHGPA opposes the requirement to notify the Southern Alps MBZ Air User Group prior to flight.

The safe use of airspace within Aoraki/Mount Cook National Park is imperative. However, this requirement should be removed from the proposed Plan as:

- sufficient safeguards have been put in place by the Civil Aviation Authority
- the requirement serves no useful purpose given that it is impossible for hang gliding and paragliding pilots to know the exact location, date and time of a flight in advance, and
- the User Group has confirmed such notification would not be useful.

3. NZHGPA opposes the restriction on hang glider and paraglider landing within the Haupapa/Tasman Glacier Landing Zone.

Again, the safe use of airspace within Aoraki/Mount Cook National Park is imperative. However, this requirement should be removed from the proposed Plan as:

- the Civil Aviation Authority has put in place sufficient protocols to provide for the safety of all air space users
- civil aviation law permits hang gliding and paragliding pilots to fly in this airspace, and they are therefore legitimate users of this airspace, and
- pilots on climbing, trekking or cross-country trips need to be able to land in this zone for safety reasons.

4. NZHGPA seeks an exemption to the one nautical mile no-fly zone around the summit of Aoraki/Mt Cook.

The great social and cultural significance of this mountain is acknowledged. Hang gliding and paragliding pilots treasure the ability to fly here and use their own personal skills to soar non-motorised aircraft on the rising air currents created by the mountain.

In accordance with the submission guidelines provided by the Department of Conservation, the NZHGPA submission:

- outlines each of the changes sought
- details the full rationale for seeking these changes
- identifies the relevant sections of the Draft Plan
- outlines the proposed wording changes which would give effect to the changes sought.

Submission (Canterbury Mountaineering Club)

I also wish to support, in full, the submission by the Canterbury Mountaineering Club (CMC) on the Draft Plan.

In summary, I support the following four submission points made by the CMC:

1. Management of the CMC Wyn Irwin Lodge

I support the CMC's submission regarding the retention of Wyn Irwin Lodge in its current location, form, and management. In addition, I support the CMC's submission regarding the use of Wyn Irwin being available for Club members and for non-members where practicable, when not in use by club members and consistent with the purpose of the lodge.

Furthermore, I would like to see the incorrect statements removed regarding the siting of Wyn Irwin Lodge that have been included in the Draft Plan. These are identified in the CMC submission.

I would like to see clarification regarding what 'formal authorisations' are/is, and what 'departmental standards' are, as requested by the CMC's submission.

2. Vehicle access in the Park

I support the CMC's submission regarding proposed solutions to manage traffic congestion within Aoraki/Mount Cook National Park.

The Park and Ride concept may help to mitigate traffic congestion, but it cannot be at the expense of other user groups of Aoraki / Mount Cook National Park who will exit and arrive at the Park at hours outside of the operating hours of proposed Park and Ride. Vehicle access should be maintained for those intending to access Aoraki/Mount Cook National Park overnight and longer. Back country adventurers, particularly mountaineers, climbers, back country walkers, and skiers/snowboarders by the nature of their activity need to be able to start (and finish) trips within the Park at hours that would fall outside any operating hours of the proposed Park and Ride system. If the long and proud tradition of mountaineering in Aoraki/Mount Cook National Park (for which it is internationally famous for) is to be maintained, it is important that this core tenement remains.

There are a number of alternative mechanisms outlined in the CMC submission that DOC should consider to help mitigate traffic congestion and allow freedom of movement for mountaineers, climbers, backcountry walkers, skiers/snowboarders and other similar user groups. I support these proposals put forward in the CMC submission.

3. Aircraft access within the Park

I support the CMC's submission which opposes the proposal in the Draft Plan to increase aircraft traffic and landing zones within Aoraki / Mount Cook National Park.

Increasing use of aircraft within Aoraki Mount Cook National Park will degrade the experience of many user groups within the Park and reduce tranquillity values within the Park. With heightened awareness regarding climate change and anthropogenic impacts on the environment, allowing an increase in aircraft traffic and aircraft access to areas of the Park which previously excluded aircraft (i.e. previously designated high tranquillity, remote areas), is not appropriate or consistent with New Zealand's climate change targets and commitments.

I support the CMC's submission on Hooker Valley remaining aircraft-free, except in case of emergencies requiring evacuation, predator control and scientific research. In addition, the Plan should reflect a stronger focus on preserving foot access to places within the Park outside the front country area. This will benefit the Park as a whole by encouraging more people to venture further into the Park, relieving pressure on front country resources while allowing more people to access the special, high tranquillity areas of the Park like the Hooker Valley.

I support the CMC's submission for the installation of a mid-valley hut (i.e. a replacement for Gardiner Hut) to make access to the head of the valley easier and safer as well as the ongoing maintenance of the Pudding Rock cables.

4. Other Matters

I support the CMC's submission regarding the proposed addition of the Liebig Range and the Godley Valleys to the Park and the World Heritage Area, provided that the Department of Conservation has the sufficient resources to administer these areas.

I also support the CMC's submission advocating for the existing use and access of the Liebig Range (i.e. Cass Valley) and the Godley Valley to allow for 4WD access along the established, unformed legal roads to these areas. I would like to see that these roads are formally identified and maintained to provide safer access to and from these areas, as well to reduce adverse impacts from vehicles in these areas. 4WD access is required in these areas not only to provide access, but also for the New Zealand Deerstalkers Association and the New Zealand Alpine Club as well as other groups, to administer their huts in these areas.

In accordance with the submission guidelines provided by the Department of Conservation, the CMC submission:

- outlines each of the changes sought
- details the full rationale for seeking these changes
- identifies the relevant sections of the Draft Plan
- outlines the proposed wording changes which would give effect to the changes sought.

Yours sincerely

Aaron Ford

Submission Form

Draft Aoraki/Mount Cook National Park Management Plan



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

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Submitter details:

Name of submitter
or contact person:

Jeremy Lucas

Organisation name:
(if on behalf of an organisation)

Postal address:

100 Waimatacuna St
Christchurch

Telephone number:
(the best number to contact you on)

Email:

- I wish to be heard in support of my submission (this means you can speak at a hearing)
 I do not wish to be heard in support of my submission
(tick one box)

Signature:

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

Submission:¹

Section:

Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.

Submission:

Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.

Decision sought:

State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:

- if supporting: 'retain Policy X'
- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

1.2.3

Recreational Values

(page 42)

SUPPORT – Includes recreational boating

RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park

1.3.1 General Management

Bylaws

31 (ii)

(page 59)

OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan.

Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2.3 (Recreational Values)

DELETE - Bylaw 31 (ii)

1.3.2

Additions to National Parks Policies

2 (a)

(page 60)

OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:

DELETE Policy 2 (a)

Please continue on a separate sheet if required.

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

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Submitter details:

Name of submitter or contact person:	Sandy Nelson
Organisation name: <i>(if on behalf of an organisation)</i>	
Postal address:	Twizel
Telephone number: <i>(the best number to contact you on)</i>	
Email:	
<input 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:	

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

Submission:¹

<p>Section: Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</p>	<p>Submission: Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</p>	<p>Decision sought: State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example: - if supporting: 'retain Policy X' - if opposing: 'delete Policy X' - if seeking changes 'reword Policy X to read (give suggested wording)</p>
<p>Natural heritage 1.21</p>	<p>Support objective six – stock in the park is at odds with the ethos of our parks and impacts on vegetation and biodiversity. Glentanner Station should no longer be able to graze sheep within the National Park. This should have been stopped years ago.</p>	<p>Retain (and enforce) Policy 6</p>
<p>Historic and Cultural Heritage 1.2.1</p>	<p>Support Policy 10 – Kai Tahu have an important role in the Park. Interpretation needs to reflect this.</p>	<p>Retain Policy 10</p>
<p>1.2.3 Recreational Values</p>	<p>Policy 7 – tranquillity, natural quiet, solitude and remoteness are impacted on by aircraft – any increase in flights needs to be minimal. It is great to see reference to these values of the Park.</p>	<p>Retain Policy 7</p>
<p>1.3.1 General Management</p>	<p>Policy 12-b – I support restricting occupancy of accommodation and related facilities. This will help enable a quality experience as well as protect the environment.</p>	<p>Retain Policy 12-b</p>
<p>1.3.1 General Management</p>	<p>Policy 12-d User pays parking goes against the ethos of our National Parks. The Draft Plan proposes a compulsory Park and Ride for peak times (see my comments on Nohoaka Place Spatial Plan 9). Why then would DOC charge during non-peak times other than as a money-making scheme.</p>	<p>Delete reference to user-pays parking from Policy 12-d.</p>

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1.3.1 General Management	Policy 19-c I support the creation of additional camping areas outside (NOT WITHIN) the park. Creation of areas inside the park would impact hugely on biodiversity values and impact on the visitor experience (reference to Recreational Values Policy 7).	Retain Policy 19-c but adjust to 'outside the park.' Add that all DOC camping areas need to be managed with an on-site presence during peak times.
1.3.1 General Management	Policy 19-d I support White Horse Hill camping being tents only. This would allow for more day-use parking and take the area back to its more traditional use which better fits with the area.	Retain Policy 19-d
1.3.1 General Management	Policy 27 Up to 50% of available bunk space in a hut being occupied by concessionaires seems to high. At Mueller Hut in particular, this seems unreasonable.	Consider a lower percentage, particularly for Mueller Hut.
1.3.1 General Management	Policy 31b – I support tight restrictions on use of powered watercraft in the Park	Retain Policy 31b
1.3.2 Additions to National Parks	Policy 2 – These are valuable additions to the Park. The braided rivers have huge biodiversity values. Including them in the Park would afford them more status and protection. I would like to see all watercraft banned from these rivers due to their potential impact on breeding riverbed birds.	Retain Policy 2
1.3.2 Additions to National Parks	Policy 3 – World Heritage Status is appropriate for these areas.	Retain Policy 3
1.3.3 Aircraft	Policy 12a – I am concerned about potential increased air traffic and resulting impact on tranquillity in the Park.	Retain (and possibly strengthen) Policy 12a

1.3.5 Bolts and fixed anchors	Policy 1b – Sebastapol Bluff is a valuable climbing area for locals and visitors. I support DOC working with NZAC regarding appropriate bolts and fixed anchors.	Retain Policy 1b
1.3.7 Fishing	Policies 1/2/3 – protecting our native fish is vital.	Retain all policies
1.3.8 Fire	Policy 2 – I agree with restricting fires to portable cooking equipment.	Retain Policy 2
1.3.9 Grazing and Farming	Policy 1 – Grazing should not be allowed in the Park. Glentanner Station have continued to graze sheep within the Park due to what I understand is an historical grazing lease. This must be addressed. Sheep have no place in a National Park and are also a traffic hazard on what is now a very busy highway.	Retain Policy 1
1.3.11 Mining and sand/shingle extraction	Policy 1 – Mining should NEVER be permitted in the Park. The Crown Minerals Act should not allow it for this possibility, but regardless the Management Plan should state that this is highly undesirable.	Amend Policy 1 to include ‘mining within the Park is highly undesirable due to the impact on natural features and biodiversity.’ (or similar)
1.3.11 Mining and sand/shingle extraction	Policy 2 – Materials should be sourced from OUTSIDE the Park to reduce the impact. Materials can be treated (see Policy 5).	Amend Policy 2 to state that materials must be sourced from outside the Park and then treated to mitigate the risk of introducing weeds (see my comments re Policy 5)
1.3.11 Mining and sand/shingle extraction	Policy 3 (see comments re Policy 2)	Delete Policy 3

1.3.11 Mining and sand/shingle extraction	Policy 4 (see my comments re Policy 2)	Delete Policy 4
1.3.11 Mining and sand/shingle extraction	Policy 5b – if material can be treated to remove the risk of introducing weeds then why would the Management Plan allow for extraction within the Park?	Retain Policy 5
1.3.16 Watercraft	Policy 3 – I agree that no further commercial watercraft activity is desirable.	Retain Policy 3
Nohoaka Place	Spatial Plan 4 – I agree with minimising new developments and opportunities in the Park when they can be provided outside the Park	Retain Spatial Plan 4
Nohoaka Place	Spatial Plan 5 – I support the inclusion of Te Reo on signs, and wonder if other languages, specifically Chinese, need to be included on some signs.	Retain Spatial Plan 5

<p>Nohoaka Place</p>	<p>Spatial Plan 9 – I support the trialling of a public transport service during peak times. This should start as an option rather than be compulsory and should never be compulsory for New Zealanders who can show identification such as a driver's licence. A public transport system will be complex and problematic, particularly if it is to be made compulsory ie residents, those visiting residents, school groups, those taking walks that may finish late in the day. I have used successful Park and Rides in U.S. National Parks, for example Zion. This works well in a valley, but Aoraki Mount Cook is much more complicated with two main valleys plus different venues in the village. I am very concerned about locals and New Zealanders in general feeling that their iconic park is no longer accessible to them. DOC is currently trialling a system for some Great Walks with a differential cost for New Zealanders and overseas visitors. Allowing vehicles with a New Zealand driver to drive into the Park would be similar and would also help retain a positive attitude towards growing tourism). Further to this any carpark should be created outside the Park or on the airport flats rather than at Birch Hill which has historic values and an extensive area of well-established matagouri.</p>	<p>Retain Spatial Plan 9 as a trial. It should not be compulsory for vehicles in which the driver can show a NZ Driver's Licence.</p>
<p>Nohoaka Place</p>	<p>Spatial Plan 10 – See my comments above. Restricting vehicle use is extremely problematic. Perhaps start by excluding larger campervans which take up a lot of parking space. New Zealanders should be allowed through by showing a NZ Drivers Licence.</p>	<p>Reword Spatial Plan 10 to include that (larger) campervans will be initially restricted and other vehicles may be restricted. Allow New Zealanders driving access to their Park.</p>

Nohoaka Place	Spatial Plan 11 – I am concerned about the proposed Park and Ride being administered from Birch Hill, which would entail the establishment of an extensive carpark and other infrastructure. The old-man matagouri and ecosystems would be severely impacted. Can this facility be created outside the Park or on the airport flats? However, I would prefer a carpark at Birch Hill than further development at White Horse Hill.	Amend Spatial Plan 11 to state that possible venues for administration of the proposed Park and Ride will be investigated, with outside the Park boundary or on the airport flats being potentially more desirable locations.
Nohoaka Place	Spatial Plan 12 – I support the development of cycle trails. I am particularly pleased to see the old Wakefield Track included on the list. However, this should be reinstated as a walk rather than a ride (taking the track to cycle standards would have quite an impact on the environment, and bikes would then need to cross the first Hooker swing-bridge and ride the first part of the Hooker Track – both very busy places and not appropriate for bikes). With a Park and Ride option up both the Tasman Valley and to White Horse Hill, this could be developed and promoted as a walk as well as a cycle trail. This would serve to take some pressure off the Hooker Valley track and others.	Retain Spatial Plan 12 with the removal of the old Wakefield Track as a bike track option (great option for a 'new' walk track).
Nohoaka Place	15f – I am opposed to all campers but particularly those in large campervans being given priority over day-visitors at White Horse Hill. Those in campervans are predominantly overseas visitors. Day visitors are more likely to include New Zealanders, who would then be excluded from driving into their own Park.	Amend 15f to state that initially large campervans will be excluded and that a system for allowing New Zealanders to access the carpark will be investigated.
Nohoaka Place	18biii – I am opposed to any new accommodation being provided in the Park as this will impact on the environment. Towns such as Twizel and Tekapo can be used by visitors who wish to visit the Park. Aoraki Mount Cook village does not need to grow. If it does it will lose much of its alpine village appeal.	Delete 18biii or strengthen it to state that new accommodation activities are not desirable.

Nohoaka Place	34a – I do not agree with charging for parking within a National Park. Having a user-pays Park and Ride or a user pays for parking option is essentially the same as charging for access to our own National Park.	Delete 34a
Nohoaka Place	34b – I support tighter control of the use of campervans within the Village and wider Park. With the proposed Park and Ride, they could be excluded during peak periods.	Retain 34b
Aroarokaehe Place	Recreational values 1 – I support Hooker Hut being re-established as a bookable facility in the valley. The hut has huge historic value.	Retain Recreational Values 1.
Haupapa Place	Vehicle Use 11 – Maintaining the 4WD track in the Tasman Valley for as long as this is viable is an excellent plan. This is historic and provides closer access to the Ball Hut area.	Retain Vehicle Use 11
Natural Heritage 1.2	1a – The proposed use of Birch Hill as the Park and Ride base would mean the removal of a significant amount of what is perhaps the most extensive well-established area of old-man matagouri in the Park; an ecosystem that is in a healthy functioning state and is in full view of road traffic. I suggest that the Park and Ride base be sited out of the Park if possible, or alternatively be sited on the airport flats, an already somewhat modified environment. In the Discussion Box on Page 80 it states that ‘this would be the best point to control vehicle access into the Park.’ I argue that the other side of the road, on the airport flats, would be just as effective and would have less impact on natural values.	Retain 1a and consider it when decisions are made as to the best siting for the Park and Ride facility (Birch Hill has a significant matagouri ecosystem).
Natural Heritage 1.2	1d – all very important – again I urge consideration of an alternative site for the Park and Ride. Birch Hill is a significant landscape, close to the road and range behind. It also has historic values. Ideally the Park and Ride would be based out of the Park. If this is not possible then it should be based on the airport flats.	Retain 1d and consider it when decisions are made as to the best siting for the Park and Ride facility.

Comments on the questions on Page 97 – my vision.

My vision is 1. That White Horse Hill is not further developed. 2. That parking is not charged for as this is simply revenue-grabbing. 3. That vehicles with a driver with the N.Z. driver's licence are entitled to access the Park as they are now. 4. That further camping facilities are not established within the Park. 5. That the Park and Ride is based outside of the Park (not Birch Hill) or on the airport flats.

Please continue on a separate sheet if required.

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Submitter details:

Name of submitter or contact person:	Brendan Denize
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Telephone number: <i>(the best number to contact you on)</i>	
Email:	

I wish to be heard in support of my submission (this means you can speak at a hearing)

I do not wish to be heard in support of my submission
(tick one box)

Signature:

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

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<p>Section: Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</p>	<p>Submission: Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</p>	<p>Decision sought: State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example: - if supporting: 'retain Policy X' - if opposing: 'delete Policy X' - if seeking changes 'reword Policy X to read (give suggested wording)</p>
<p>1.2.3 Recreational Values (page 42)</p>	<p>SUPPORT – Includes recreational boating</p>	<p>RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park</p>
<p>1.3.1 General Management Bylaws 31 (ii) (page 59)</p>	<p>OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan. Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2.3 (Recreational Values)</p>	<p>DELETE - Bylaw 31 (ii)</p>
<p>1.3.2 Additions to National Parks Policies 2 (a) (page 60)</p>	<p>OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:</p>	<p>DELETE Policy 2 (a)</p>

Please continue on a separate sheet if required.

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

Submission Form

Draft Aoraki/Mount Cook National Park Management Plan



Once you have completed this form

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

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

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

Submitter details:

Name of submitter or contact person:	Ian Owen (President)
Organisation name: <i>(if on behalf of an organisation)</i>	NZDA South Canterbury Branch
Postal address:	Timaru,
Telephone number: <i>(the best number to contact you on)</i>	
Email:	<hr/>
<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: Ian Owen	

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

AORAKI / MOUNT COOK NATIONAL PARK MANAGEMENT PLAN
September 2018
Submission on behalf of South Canterbury Branch New Zealand Deer
Stalkers Assoc.

BACKGROUND & GENERALLY APPLICABLE POINTS

Our Branch (hereafter We) (a) of New Zealand Deerstalkers Association (hereafter NZDA) (b) consists of 348 members, representing the wider recreational hunting fraternity, and was constituted in 1952, coinciding with the creation of Mt Cook National Park. We are a non profit organisation.

We abide and are bound by the New Zealand Deerstalkers' Association Inc Code of Ethics. The NZDA was established in 1937. Hunters have a vested interest in, and are, conservationists. The prime example of this principle is the late Dr Geoffrey Orbell MBE - NZDA member and it's first President and world renowned for his contribution to conservation e.g. Takahe recovery when thought to be extinct. NZDA is not just about 'blood' sports as may be some of the public perception.

We present this submission to address our interests & concerns regarding the Aoraki / Mt Cook National Park (hereafter the Park) (c), and the Management Plan for same (hereafter the Plan – page numbers refer) (d). The Plan seeks to outline natural, cultural, historic, recreational, and engagement values associated with the Park, and the management of same.

We note that our organisation, and potentially others with a vested interest in the Park and Plan, and who represent significant numbers of New Zealanders making a contribution to Parks and New Zealand's outdoor places in general, were not consulted in the preparation of the Plan from the outset.

We request, in future, that NZDA be consulted and represented 'at the table' at the inception of any Park reviews or matters that impact upon us as a significant group of Park users.

We make general points (below) as regards the Park and Plan, which are to be kept in mind with the reading of the remainder of our submission, and more specific points in detail as they relate to particular locations, assets, activities and access pertinent to our organisation.

- We note the somewhat poor clarity and specifics of some of the Maps in the Plan (1 pg 8, 4 p. 43, 5 pg 46 and others) and also the location of Thar Lodge and Wyn Irwin Huts are marked incorrectly on Map 9 p.85 (interchanged)
- The terms visitors, public etc used in the Plan are preferred in our submission to be further defined as tourists (aka from overseas) and New Zealanders respectively, where used
- The term 'formal authorisation' (p.57 1.3.1, 14,79,91,106,112 et al) lacks definition and we are therefore unable to determine what it means in context for SCNZDA/NZDA.
- The term 'private accommodation' lacks definition (as above)
- Inconsistencies / contrary statements and others of an obviously ill-informed basis (cf.under Thar Lodge for example)
- The Plan focuses a lot on the front country. Hunters are the eyes and ear of the back country and there should be more emphasis on this part of the Park (also in reference to mountaineering/climbing pursuits)

SUBMISSION

The Park

A precursor to discussion in detail of any proposals or alterations to the Aoraki / Mount Cook National Management Plan review currently underway should be an emphatic note to the effect that, while the plan reflects significant and valued emphasis on the consultation process with Kai Tahu as manu whenua and acknowledgement of aspects of the Treaty of Waitangi , whose local and national aspirations and values are imbedded throughout the Plan (cf. p. 17) , there needs to be a well comprehended recognition of the heritage and aspirations of other New Zealanders.

Persons for whom empathy to the concept of ahi ka (e) may not be as chronologically long but exists as a reality for them and is not therefore insignificant; for whom this land, belonging to all of us, represents what our forebears also valued, and for whom emigration to New Zealand held the opportunity to overcome the oppressions and divisions of a class system and the chance for a more egalitarian society than the one they left behind. Where vast tracts of land and access to physical resources were not the prerogative of a wealthy few or of any one social group, and beyond the aspirations of many. The stated objective of a shared partnership (p. 18) needs to be completely inclusive of , and to the benefit of, all New Zealanders. The quote from Julius Haast (p. 22) is one of the few allusions to other (non Maori being the term used) stakeholders , in the Plan

The presence in New Zealand, of all New Zealanders from all parts of the world, is the result of historical and current immigration – often these journeys have been dangerous and difficult. This huge step in which factors like pressures of population, access to resources and perceptions of better opportunities and promise of a better life may have been factors, are underscored by universal and personal impulses – that of exploration, which is an essential of human behaviour and is also, a motivating factor in terms of our interaction with the Park.

It is significant that a quote from Samuel Butler (1863) is the footnote to this current review. Even so, this only expresses an appreciation of the physical presence and majesty of Mt Cook / Aoraki . Not expressed, but implicit, is the undefinable metaphysical presence that we can all relate to.

We, and the NZDA as a whole (8000+ members), have had a partnership with the National Parks Board and subsequently Department of Conservation (DoC) (f) for 60+ years as regards Thar Lodge and other facilities in the Park. The relationship therefore has a continuum: it has been, and is, of a positive nature and mutually beneficial to the Park, Park users and also at a material level to the local economy. In light of this, it is therefore particularly disappointing and an unfortunate oversight that the DoC Visitor Centre at Mt Cook/Aoraki doesn't acknowledge the contribution that hunters, hunting and game animals – which predate the formation of the Park by decades – have made.

This was especially the case in early days, when, along with mountaineering (which is acknowledged at the Centre), hunting was actively promoted.

Thar Lodge – situated in Nohoaka Place GR E1365725 N5155114 (note Map 9 label error as stated)



It is noted that the use of seasonal settlements (p. 37,38) – Nohoaka (g) – is kept alive today with more permanent structures now present. As such, these places now provide, year-round, a base to enable engagement with the environment and the provision of facilities to allow visitors to engage with the wider Park (p. 84) as was historically the case. Thar Lodge, (hereafter the Lodge) (h) along with Wyn Irwin Lodge, Unwin Lodge and all facilities in and around the Hermitage (hereafter the Village) (i), constitute the main areas of habitation/accommodation. We note that the area in which Thar Lodge is situated is not encompassed in the maps pertaining to the Village (Nos. 12 & 13)

Thar Lodge was opened over 60 years ago (permitted in 1955) following co-operation with The Mount Cook National Park Board, when the SCNZDA had provided the labour to build the Hooker Swing Bridge, soon after the creation of the Mt Cook National Park (as it was known then) in October 1953, thereby improving access to the Park for all. Co-operation with the Park Board, and now DoC, was honoured and always will be. The Lodge is an essential hunting & training base.

The Lodge is warm, well maintained and has a full range of facilities, and has been successfully managed since its inception. It has been regularly upgraded to meet evolving standards. It holds great cultural and historic significance, and is valued by, the SCNZDA & NZDA and is part of the story of Aoraki / Mt Cook Park. We do not consider the Lodge to fall into the category of private accommodation (note: not clearly defined) on p. 72 1.2.12, as it is a (non profit) organisational asset and is available to, and is well used by the public, via a booking system which is essential to

regulate numbers using at any one time (so as not to stretch the facility and its amenities beyond the purpose for which it was built and by extension those of the Park). It is also, as noted, outside the mapped Village areas as referred to above.

We support the need for there to be a range of accommodation options, and fit for purpose amenities (p. 86) which introduce people to the natural environment and outdoors safely and with ease of access (p. 87). To that end, Thar Lodge, owned & maintained by the SCNZDA , provides accommodation available not only to organisation members but anyone else who may wish to book, and in doing so gives the option of a more traditional and affordable ‘ Kiwi values / New Zealand’ experience rather than a tourist one. This is also attested to in the records from the Lodge visitors books. The modest cost of accommodation is also used to maintain other SCNZDA assets in the Park, for the public access of all. (see other Huts etc below).

We refute a number of the statements made on p. 91 as regards Thar & Wyn Irwin Lodges in the paragraph starting ‘Current location of... ‘stating that water and sewerage facilities are problematic , that the location near Foliage Hill limits sunlight and lodges are hard to keep warm in winter’ and so on. This is not the case and Thar Lodge is self -reliant and more than adequate in terms of heating and lighting etc. It does in fact, provide year-round comfortable accommodation (cf. in winter contrary to statement when tahr hunting predominates due to the rut). These comments are not only in error but would appear to be from a poorly informed source or one that is quite unfamiliar with the Lodge itself. They are also contradicted in part on p.102 where it states ‘...lodges are well sited to be used & valued’

Similarly, the stated issues with parking tensions and confusion as to available accommodation (p.93; 4.) is exaggerated and any such have been largely mitigated by the placement of the sign at the access to the two lodges. There is more than enough space for vehicles to park. What has changed over time, is that the adjacent carpark at the road end has expanded incrementally. We were not consulted on the impact of that on access to the Lodge and lost carparking capacity when the campground was established, round 2010, in spite of ourselves having been an established presence for several decades by then. We therefore support the statement on p. 96: 3.v) that the lodges parking area should be separate from the main campground carpark (as has been facilitated to some degree by sign placement as above)

We adhere to a strict no waste policy at the Lodge. The Lodge is not at threat from any known natural hazards (p. 55). As stated, the Lodge is available for public booking and numbers able to be accommodated are not exceeded (p.56). In terms of tranquillity, the Lodge is in a ‘high’ location, with human noise in the soundscape, chiefly from the White Horse Hill Campground, being the most disruptive to the ‘natural quiet’ (p.45 – 47) .One of the most disturbing effects on the soundscape (and in the Park in general) is difficult to express. It is the loudness of peoples’ conversations / communications as they move along paths and tracks etc. speaking at a volume which, within the tranquillity of the landscape, is overly loud and does not suggest respect for others or for the awe inspiring presence of the natural environment itself.

The White Horse Hill campground contributes to this in large part. It is promoted under the banner

‘Camp beneath magnificent alpine scenery including Mt Sefton’. There are 60 non powered sites

(according to DoC website), and even at a conservative estimate, translates to round 100+ people camping if at capacity. Booking are not available. Showers are 2.5km away in the Village. Only a basic shelter is available for cooking. The problems with waste, parking etc are propagated by the evolution of these factors; factors which are not issues with the Lodges. In the Plan (p.96; 3.) it is acknowledged that the facilities are basic and contribute to people washing in streams etc. The Campground is in urgent need, not of expansion, which would also impact a great deal further on efforts to maintain tranquillity under the Plan, but of control and a booking system.

Significantly, the Lodge provides access to the Park for hunters who assist DoC with conservation and management through hunting (see below under Tahr/Thar). The nature of hunting activities is such that the Lodge provides a base away from the main flow and observation of people in the Park and Village. This fits well with the often irregular hours of coming and going that hunters have of necessity. Coupled with hunting activity the passage of game trophies and the carriage of firearms associated with the Lodge location, keeps these movements at a more discreet distance (see below under Park & Ride). The location, while maintaining a sense of place, does not impede any ‘views’, from the Village or elsewhere (cf. p. 103-104). Further high-rise development (which would impact far more on the ‘views’) and the associated extra need for facilities in the Village (p. 107) itself should be restricted, as should tourist numbers which drive future development. (see also under Park & Ride)

Our Lodge, along with Wyn Irwin Lodge beside us, are historic places and need to be represented in the Plan as such

Around 2006-07 the idea of a 30 year concession for lodges and huts was mooted by DoC. In spite of several attempts to follow this up, the idea seemed to lapse.

We believe that we adhere to the criteria detailed on p. 57, 14 and wish to avoid on-going resubmission as regards Thar Lodge. We would like to see the Director General of Conservation, (or the current holder with the power to do so, according to the National Park Act 1980 (hereafter NPA) (j) Part 8 ; 76), in his/her capacity, as soon as may be undertaken, and following discussion with us, to :

Consider the granting of a permit / Certificate of Title in perpetuity for Thar Lodge to SCNZDA

HUNTS Course (Hunter National Training Scheme)

We agree with the statement (paragraph 4, p. 50) that youth are the voice of the future and must be encouraged to access wild places... to (foster) passion and appreciation for the natural environment.

To that end, Thar Lodge provides a base for the nationally recognised HUNTS Course (a course with a set curriculum that is successful and well attended throughout New Zealand). SCNZDA utilises this course to introduce new / young hunters, and persons wishing to acquire outdoor skills, to the wider natural environment in a safe, managed way. (Cf. p. 51 Policies 4 a,b,c)

Tahr / Thar

Tahr & Chamois were released in the Park near the Hermitage area in 1904 & 1909, and 1907 respectively.

The Lodge provides access for hunters who assist DoC with conservation and management of the environment through hunting. Hunters are an asset to conservation and should be recognised as such. Hunters also recognise as game animals those which others may classify as pests, game animals exclusively being non native species.

We are conscious that the Himalayan Thar Control Plan (hereafter HTCP) (k) sets a target of zero Tahr in the Park (p. 32 of the Plan) as part of the objectives on p. 33 – c). Eradication is reiterated further on p. 34 5.) While on p. 34; 9, we have the statement about implementation of management programmes to reduce... in line with HTCP. These statements raise conflicting scenarios to many people. ‘Eradication’ and ‘Management’ more likely appear to be polar opposites as is any suggestion of Management by Eradication or Eradication by Management. There needs to be a clear policy, moving forward, in line with p. 35 10. a,b,c to ‘Encourage commercial & recreational hunting groups to contribute to effective control of wild animals ‘... and further extrapolated on p. 36 under Pest Management .

We believe that the reported figures (national estimates in the 10s of 1000s, and 1000s in the Park itself) of the number of Tahr are greatly exaggerated and cannot be well defined by the methods currently used to determine same. We need established scientific facts. A much more robust scientific method of determining numbers needs to be brought in to play. If the current cull numbers are allowed to be carried out, in all likelihood it will be subsequently determined that total herd numbers were nowhere near those on which the cull was based and hence the Tahr in all likelihood will be gone. This is not management ; it is annihilation of the most brutal kind.

Under the Game Animal Council Act 2013, any species of game animal on any area of public conservation land... can be designated a herd of special interest.

We would like to see:

Himalayan Tahr granted this status in accordance with a management (not eradication) plan

Hunting, as already stated, is a way of life for some, an expression of our history and culture and the freedoms our country provides and which make us the envy of many other parts of the world. In New Zealand, it is a key recreational activity. MANAGED game, ALL game, and the ability to contribute to that management, provides this fulfilment, albeit hunting with a firearm, bow or camera. Hunters and hunting provide valuable revenue for DoC and boosts the local economy as well. Page 77, 1.3.17 of the Plan records how game animals and wild animals are managed – to hunters these are often two sides of the one coin. Of importance also to the national economy, is the income generated from overseas hunters which would be lost should our game animal populations be compromised.

We dispute the statement on p. 141 under Natural Values regarding the presence of other 'pest' animals in the Park - wapiti, wallaby, pigs and other deer. We feel this is an extreme assumption particularly where wapiti are concerned, and is a sensationalist one.

NZDA is a valuable adjunct to DoC resources and needs to be seen as a partner in a long term, sensible management plan that will address the concerns of all parties. There is a bigger picture here.

Aerial access

Hunters need to have the option of unrestricted aircraft access as and where possible in the Park, wherever they may need to go to hunt game animals (p. 62-66 refer), so consideration needs to be made for this. In this they assist DoC in game animal control and so need to be accommodated.

There needs to be a 2 – 3 kilometre buffer zone round huts and lodges which excludes aerial assisted trophy hunting (AATH) . This is essential to mitigate conflict with ground-based hunters & hut users, lessen danger, and if not put in place and acted upon, presents a potential breach of health and safety issues.

Pae Tawhiti & Pae Tata Place (other SCNZDA Huts)

Three other huts in the Park are maintained by SCNZDA .



Steffan

Red Stag

Eade

They are : Steffan Memorial Hut (Onslow) GR E1382640 N5167994
 Red Stag Hut (Park boundary) GR E1398220 N5176170
 Eade Memorial Hut GR E1396483 N5178459

SCNZDA took over responsibility for maintenance of these huts rather than see them gone from the Park altogether. This was particularly true of the Steffan, an original trappers' hut which was going to rack & ruin. The Eade was pre-fabricated, then established in it's location by SCNZDA. Even though we are a non-profit organisation, there is no on-going cost to DoC. SCNZDA has also built and maintains bivvies and huts open to all comers, in the Rangitata catchment. Our huts, like Thar Lodge, are of personal and historical significance to us and are often memorials to past hunters ; they are part of our cultural heritage and the heritage of the Park.

They offer shelter and protection to all comers; a vital asset in the Park where weather extremes and sudden changes in the environment can make for hazardous and potentially life threatening situations if they were not in the landscape. This is apart from their planned use by hunters and other Park users.

No better description for what a hut means and is, to hut users is the following quote from 'A Bunk for the Night ' – A Guide to New Zealand's Best Backcountry Huts' pg. 12

'... our relationship with huts is a little like our relationship with members of our whanau (family). Some we see all the time and they always feel welcoming. Some seem austere. Some feel like old friends. Some have lots of character but they don't keep us warm. Some keep us warm but don't appeal. Others we see once in a blue moon, and wonder why we haven't caught up sooner. What they invariably offer though, is welcoming shelter. Walking in the door of a backcountry hut can feel like a hug in the wilderness.'

SCNZDA takes great pride in maintaining and preserving these huts and their features which are, and will be, of historical & cultural significance to them. We support, where possible, except for the advent of safety concerns, the occupation of these huts to be

by bookings. In line with p.57 -18, camping next to huts is discouraged and must, if it does take place for any reason, be strictly monitored, all waste packed out and potential environmental impacts recorded and reported.

We further note that commercial concessionaires in the Park should honour the owners of the huts by adhering to a booking process and payment.

Park & Ride

As previously stated, hunting activity, the passage of game trophies, and the carriage of firearms (in particular associated with the Lodge location) keeps these movements at a more discreet distance from other Park users. For this reason alone, Park & Ride is not a feasible option for hunters. Nor can the timings of departure and return from hunting as in the case of other alpine sports) be exact.

Further, we feel that it is not appropriate to restrict in any way, self-drive access to New Zealanders should they not opt to Park & Ride. At the very beginning of the NPA (k), Part 1 *Principles to be applied in national parks* states under 4. .. public to have right of entry. We believe this should be fostered for New Zealanders, who pay for this privilege through taxation. These are the lesser 1/3 of persons accessing the Park, only around 50% of whom are local to the adjacent Canterbury province of New Zealand (p.42). New Zealanders should be encouraged to visit, experience and appreciate in a real sense, the power of our natural spaces.

Additional costs should fall to tourists (as it does for Great Walks which recently increased prices for tourists but not New Zealanders i.e. no charge) who may get a short term 'Wow' memory & and tick-the-box experience along with other similar ones while in New Zealand, not to New Zealanders who support the long term maintenance of the Park and should be able to return, unrestricted. If needs be, the production of a New Zealand driver's licence should be all the passport needed or some sort of pass system.

Putting a premium on a destination experience, not in monetary terms but in terms of access, has the spin-off effect of weeding out those less likely to appreciate it and keeping control of the need for future (commercial) development. Tourist access should be on a bookings basis only for those wishing to stay over and otherwise by a numbers per day limit.

We believe Park & Ride is a much more viable, and indeed necessary directive, for freedom campers and day tourists, who do not have booked accommodation at any Park facilities, and such facilities need to adhere to strict booking practices in advance of arrivals. Proof would need to be produced of pre booking to gain access to stay overnight(s) in the Park. It would be need a system similar to the Te Araroa trail and other Great Walks. Given recent media attention to this, it would be pertinent to limit access numbers for tourists to ensure New Zealanders would not miss out.

We also believe that occupants of campervans , other than by way of a day(s) pass system, should not be allowed to overnight in the Park unless they have full on board ablution needs for a minimum of three days. This would go a long way to easing

congestion on access routes and pressure on Park resources .We raise this because we are aware of , and concerned by, large numbers of such travellers in the above two categories, using carparks at road ends e.g. the one adjacent to Thar & Wyn Unwin lodges, to stop in overnight(s). The area round the carparks, and in particular Foliage Hill, (even Thar Lodge doorstep) have been or are regularly used as toileting places, with all the attendant problems. This shows a lack of respect for New Zealand's environment and values but as outlined when discussing the campground, this has not been helped by an ever increasing parking area capacity without reference to suitable amenities .

This is also contrary to the concept of a Protected Ecological zone in the Village as outlined on p. 108, which surely is desirable throughout the Park. Similarly, tourists may potentially, even if unknowingly, breach the biosecurity of the Park. Park & Ride could serve the function of a control point in that regard.

We attach, below, an excerpt from the Mackenzie District Council (for areas adjacent to the Park) press release on such matters which have been necessitated by similar irresponsible behaviour, and we suggest the adoption of similar guidelines within the Park.

MACKENZIE DISTRICT COUNCIL

PRESS RELEASE (annotated)

ENJOY YOUR STAY BUT PLEASE RESPECT OUR PLACE

10 October 2016

For immediate release

Mackenzie District Council extends a warm welcome to freedom campers but also wants to remind them ... of the rules around camping in their patch ...

The council's Responsible Freedom Camping Bylaw came into effect in August this year. The new bylaw includes a more stringent definition of 'self-contained' and also includes new rules about where freedom campers can stay.

"We welcome all visitors to our beautiful part of the country but we also ask that they respect our place. This new bylaw helps us to safeguard our environment for our own community, for visitors, and for future generations," ...

The new bylaw means freedom camping is no longer allowed (in certain areas)... and restricted camping is allowed for a maximum of three consecutive nights with a self-contained vehicle.

The new bylaw tightens the definition of 'self-contained' to include vehicles that meet ablution needs for a minimum of three days without the need for external services or to discharge waste into public facilities or the environment. The vehicle's toilet facility must be readily usable and the vehicle must comply with New Zealand standards.

"The bylaw is designed to protect the health and safety of people in our community and visitors, and encourage fair access to our beautiful lakes and attractions..."

Other access in the Park

We concur with the sentiment on p.148 that vehicle access should only be allowed as far as Separation Stream.

We would like to see footbridges across both the Tasman River and Murchison River to improve access, and established tracks up the Tasman Valley. Also retention of vehicular riverbed access up the Godley. This would alleviate some of the pressure on the Hooker Valley carpark and get people further in to the Park, rather than concentrating on, and overcrowding, the front country

SUMMARY

The Plan concludes with a quote from Samuel Butler on the majesty and spectacle of our mountains and Mt Cook / Aoraki.

We wish to see the Plan as a living document, taking into consideration freedom, welfare, relationships, symbolism, pride of place, aspirations and Conservation of Human Rights.

To that end we need:

- To see the heritage of all New Zealanders recognised and respected
- Thar Lodge, at it's present location, to be granted to SCNZDA in perpetuity
- Effective tahr management and establishment of status as herd of National significance
(Proof that not all game animals cause the damage attributed to them and may in fact be the most economic 'crop' that some country can produce)
- Recognition of Thar & (Wyn Unwin) Lodges as being of value to the history of the Park as well as other SCNZDA huts in the Park
- Unrestricted access as we currently have for Lodge and hut users throughout the Park
- Unrestricted access to the Park for all New Zealanders
- To be counted among the groups, *AT THE OUTSET*, to be consulted as having a significant vested interest due to our historical connections to the Park, our on-going contribution to the Park & the work of DoC in this Park,(and for it to be promoted at the DoC Visitor Centre) and any others in N Z where this request is applicable

We conclude with an extract from NZDA's 50th anniversary publication: (p.48-49)

...'how do we preserve for our sons and grandsons the opportunities we have enjoyed... (by) the preservation of all species of game animals in such numbers that they are in balance with the natural regeneration of our native forests, that they are in a state of control where our beautiful birds life is not endangered, and that the numbers are held at such a level that they do not endanger the economics of our country'

We are drawn, equally as human beings, to these places for diverse physical purposes and pursuits, but it is here that we all ultimately acknowledge the vastness and timelessness of our home land ; our aim is to treasure it, the resources it holds and our place in it as New Zealanders, with respect, guardianship and preservation.

He aha te mea nui o te ao
What is the most important thing in the world?
He tangata, he tangata, he tangata
It is the people, it is the people, it is the people
Maori proverb

We wish to be heard in support of our submission . We reserve the right for resubmission should the final Plan introduce any additions deemed to be significant and not covered in the draft.

South Canterbury Branch New Zealand Deerstalkers

President : Ian Owen
Secretary: Stu Dupree
Contact details : deerstalkerssc@gmail.com

Glossary & Abbreviations :

- a. We (SCNZDA) – South Canterbury Branch New Zealand Deerstalkers Association
- b. NZDA – New Zealand Deerstalkers Association (National body)
- c. Park – Aoraki / Mt Cook National Park
- d. Plan – Aoraki / Mt Cook National Park Management Plan (Draft Sept. 2018)
- e. Ahi ka – literally the long fire – Maori concept of a continuum of occupation (habitation)
- f. DoC – Department of Conservation
- g. Nohoaka – a place to sit – cf. Maori seasonal occupation sites
- h. Thar Lodge – NZDA Lodge situated at road end Hooker Valley Road
- i. Village – the built up area centred round the Hermitage, DoC visitor centre & other amenities
- j. National Parks Act 1980
- k. Himalayan Thar Control Plan 1993

Sources Consulted :

Aoraki / Mount Cook National Park Management Plan – Draft – September 2018

<https://www.doc.govt.nz/get-involved/have-your-say/all-consultations/2018/draft-aorakimount-cook-national-park-management-plan/>

National Park Act 1980

<http://www.legislation.govt.nz/act/public/1980/0066/latest/whole.html>

Himalayan Thar Control Plan 1993

<https://www.doc.govt.nz/globalassets/documents/conservation/threats-and-impacts/animal-pests/tahr/thar-plan-1993.pdf>

A Bunk for the Night – A Guide to New Zealand's Best Backcountry Huts by Barnett, Brown & Spearpoint. Pottin & Burton 2016

N Z Wildlife Magazines (NZDA) editorials by J B Henderson – Issues 5 1963, 6 1964 , 20 & 21 1967

Mackenzie District Council media release re freedom campers 10.10.2016

http://www.mackenzie.govt.nz/Site/Media_Releases/mdc_appoints_animal_control_contractor.aspx - noise, dogs and extra toilets – patrolled
Wild Animals Control Act 1977
<http://www.legislation.govt.nz/act/public/1977/0111/40.0/DLM16623.html>

Game Animal Council Act 2013
<http://www.legislation.govt.nz/act/public/2013/0098/latest/DLM4105024.html>

New Zealand Deerstalkers' Association Inc Code of Ethics (as per website of the NZDA) <https://www.deerstalkers.org.nz/code-of-ethics-and-field-guidelines.html>

Radio N Z item 22.6.18 – re bookings on Great Walks; NZers missing out
<https://www.radionz.co.nz/news/national/360192/great-walk-s-xmas-hut-bookings-prove-too-popular>

Radio N Z item 2.6.18 – re higher tourist prices for Great Walks
<https://www.radionz.co.nz/news/national/358774/tourists-to-pay-more-than-locals-on-most-popular-great-walks>

The Deerstalkers. A History of the New Zealand Deerstalkers' Association 1937-1987 (50th anniversary) .Philip Holden. Hodder & Stoughton 1987

Te Ara Encyclopaedia of New Zealand (on line)

Hunting Guide to introduced Wild Animals in New Zealand. L H Harris. N Z Forest Service 1973

Submission Form

Draft Aoraki/Mount Cook National Park Management Plan



Once you have completed this form

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

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

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

Submitter details:

Name of submitter
or contact person:

Paul Robertson

Organisation name:
(if on behalf of an organisation)

Postal address:

Christchurch

Telephone number:
(the best number to contact you on)

- I wish to be heard in support of my submission (this means you can speak at a hearing)
- I do not wish to be heard in support of my submission
(tick one box)

Signature:

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

Submission:¹

Section:

Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.

Submission:

Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.

Decision sought:

State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:

- if supporting: 'retain Policy X'
- if opposing: 'delete Policy X'
- if seeking changes 'reword Policy X to read (give suggested wording)

1.2.3

Recreational Values

(page 42)

SUPPORT – Includes recreational boating

RETAIN - Recreational Values as they are, because they provide for the opportunity to experience all types of recreational boating within the park

1.3.1 General Management

Bylaws

31 (ii)

(page 59)

OPPOSE – because it doesn't allow for recreational boating, which is contrary to the recreational values of the plan.

Use of powered watercraft (jet boats) for the Godley and Tasman rivers i.e Haupapa Place and Pae Tawhiti Place and any proposed Park Additions is consistent with 1.2 3 (Recreational Values)

DELETE - Bylaw 31 (ii)

1.3.2

Additions to National Parks

Policies

2 (a)

(page 60)

OPPOSE – Currently these rivers are all managed by the Mackenzie District Plan, (as a delegated authority of Maritime NZ), which is an appropriate mechanism for river control and falls under the RMA (Resource Management Act) which as a matter of NATIONAL IMPORTANCE provides for (under Section 6d) the maintenance and enhancement of public access to, and along the coastal marine area, lakes, and rivers:

DELETE Policy 2 (a)

Please continue on a separate sheet if required.

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



GLIDEomarama.com
New Zealand

Gavin Wills
Managing Director,
Glide Omarama Ltd
Omarama.

28 January, 2019

Aoraki/Mount Cook NPMP Submissions
Department of Conservation
aroakinp@doc.govt.nz

Dear Planning Team,

I submit on behalf of my company Glide Omarama and all pilots that enjoy flying Gliders from Omarama.

We respectfully raise two issues within the current Draft Management Plan that are important to glider pilots.

1. That the sport of Gliding is not included in the draft Plan as a valid Park recreation.
2. That Gliders appear to be excluded from soaring along the summit ridge of Aoraki.

The first recorded flight by a Glider over Mount Cook was in 1953 by English pioneering aviator Phillip Wills. In the 65 subsequent years there have been thousands of flights by Gliders into the Mt Cook National Park including many along the Aoraki summit ridge.

Currently several hundred flights over the Park are made each year by Gliders that take off from outside the park boundaries. The majority of these flights are by solo pilots who use the updrafts created by the westerly winds to soar along the summit ridge of Aoraki. Such is the popularity of this Mt Cook summit ridge flight that glider pilots from around the world visit New Zealand to attempt it. Its significance to the NZ gliding community is such that the flight is included as the ultimate challenge in the GNZ Flight Training Manual.

The skills and knowledge required by a Glider Pilot to carry out such a flight along the summit ridge are considerable. The challenge and magnificence of the experience leave an indelible memory, comparable to that of the mountaineers who climb up from below.

These glider flights generally originate from Omarama, outside the Park, and return to their place of origin but on rare occasions they may make an emergency landing at the Mount Cook or Glentanner airfields. Typically, the flights follow routes along all the major ridge lines within the

Park including along the summit ridge of Aoraki. At all times these gliders comply with the CAA rules, including the operational requirements for flying within the Mount Cook MBZ. Gliding NZ and Glide Omarama are both represented on the Mt Cook Aircraft Users Group which allows for any safety issues within the area to be appropriately addressed.

The fact that Gliding is not recognised as a recreation within the Park despite its long association with the Park, despite its inclusion in the 1984 centennial celebration film "Footsteps to the Sky", and despite being a most loved Park activity in the recent TVNZ series "Wild About New Zealand", is an indication of the very low impact that Gliding has had on the Park. Few people know we are there. Gliders make no noise, leave no trace, fly on windy days when mountaineers and others are confined to lower elevations, and mysteriously appear and disappear. The only group of Park users that are normally even aware of the presence of Gliders over the Park are resident aircraft operators who may communicate with the glider via radio.

We understand and accept that the 1 nautical mile "no-fly" zone around Aoraki respects the cultural significance of the mountain and that it may be primarily aimed at powered aircraft. However, because a Glider is considered to be a motor-less aircraft the statement appears to exclude Gliders, (as well as Para-gliders and Hang-gliders) from soaring along the ridge of Aoraki. Also, because Gliding is not included as a valid National Park recreation the cultural sensitivity of soaring motor-less Gliders along the summit ridge has never been discussed or considered with Kai Tahu.

We therefore submit that:

1. Because of its long and frequent association with MCNP, and because of the importance of the Park to the sport, Gliding should be recognised in the Management Plan as a recreational activity that occurs within or over the Park.
2. And we seek an amendment to proposed section 2.2.3, Outcomes, Recreational values, to reword the second sentence of the first paragraph to say; "A 1 nautical mile 'no-fly' zone around Aoraki/Mount Cook for powered aircraft respects the cultural significance of the mountain."

Gavin Wills
Managing Director,
Glide Omarama Ltd