



Penny Bicknell
Business and marketing consultant
BrandAid.

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Dear Penny,

Oparara draft concept paper

Federated Mountain Clubs was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of over 20,000 members in more than 80 clubs.

FMC appreciates the chance to provide feedback on TRC's draft concept relating to potential development at and around the limestone arches at Oparara in Kahurangi National Park.

Statutory setting

The concept paper is correct in saying: *Any future developments in the Oparara Basin need to be compatible with national park statutory planning documents - the Kahurangi National Park Management Plan and the West Coast Conservation Management Strategy.*

Priorities for consideration as TRC proceeds with the Oparara project include that:

- * sitting above the management plan is the National Parks Act 1980, which gives the mandate that lands concerned be *preserved as far as possible in their natural state.*
- * section 6(a) of the Conservation Act obliges the Department of Conservation to manage the land at Oparara.
- * the Conservation Act 1987's ranked priorities are: natural and historic values' conservation; the 'fostering' of recreation; and the 'allowing' of tourism (s6(e)).

- * neither the National Parks Act nor the Conservation Act has an economic mandate.
- * a primary objective of the Kahurangi National Park Management Plan's vision is: *To retain the essential character of Kahurangi National Park as a remote, undeveloped, natural area of great beauty, natural quiet and diversity, and of value for whakapapa, recreation, appreciation and study.*

The statutes and plans referred to above have been built carefully through thorough processes and their provisions are well-founded and long-sighted.

The statutes and their provisions must be respected and deferred to.

The draft concept

The concept as expressed in the paper concerns exploitation of Oparara as a resource to drive *the local and regional visitor economy and deliver social and economic benefits to the local area and its communities.*

However well-intentioned the workstream's kaupapa may be, in FMC's view, it is at best not mandated by the relevant legislation, and at worst, could lead to activities that would be abrasive to the statutes.

Oparara's future

DOC has statutory responsibility - and therefore, requisite scientific knowledge and other specialist expertise - for managing Oparara, a rare and fragile national park site.

FMC is uncomfortable that groups with overtly different mandates and expertise from those of DOC have been leading, and are continuing to lead, conceptual work relating to the area's future.

We understand that tourism growth has prompted the need to refine ways in which public access is managed. Opportunities that are in accordance with the spirit and intent, as well as the letter, of the relevant legislation, should certainly be thought about. If such consideration were to be given to management at Oparara, its scope should include:

- * full and ongoing DOC management, in line with the relevant statutes.
- * appropriately qualified multi-disciplinary assessment of the level of visitor impacts the area can accommodate while prioritising natural-state preservation as far as possible.
- * based on the recommendations of multi-disciplinary assessment (as per above), dispersal of visitors spatially and temporally as far as necessary to protect all natural features appropriately.

* the use of ecological, physical, and social constraints as necessary to achieve ongoing appropriate visitor dispersal.

FMC believes that if the principles and activities described above are acted on genuinely, Oparara's future management should be consonant with the spirit, intent, and letter of the relevant legislation.

Conclusion

The kaupapa of the present workstream on development at Oparara is, in FMC's view, in tension with the relevant statutes and planning instruments falling from them.

FMC would be unable to support a proposal that furthered the concept as it presently stands. Oparara should be managed:

- * according to legislation (the National Parks Act 1980 and the Conservation Act 1987).
- * by the Department of Conservation according to its statutory hierarchy (s6(e)).
- * according to the Kahurangi National Park Management Plan.

Consideration should be given to:

- * evidence-based comprehensive management of access that will ensure the land at Oparara is preserved as far as possible in its natural state.

Yours sincerely,

J R Finlayson,
vice-president, Federated Mountain Clubs.

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