



1 February 2019.

Sam Newton
Chair
Canterbury Aoraki Conservation Board.

Dear Sam,

Draft Aoraki/Mount Cook National Park Management Plan

We wish to be heard in support of our submission.

Introduction

Federated Mountain Clubs was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of more than 22,000 members in over 80 clubs. This core function has seen FMC's close involvement in conservation and recreation planning since its own - and the Department of Conservation's - inception.

We note that FMC's establishment was in response to negative impacts of commercial enterprise on public rights in publicly-owned lands. Our organisation's work contributed to achievement of national park status for the Aoraki/Mount Cook area.

Federated Mountain Clubs has deep concern about many aspects of the draft plan. Interacting flaws exist on all levels from the systemic to the detailed, in our view making it inadequate as a basis for a final draft and/or operative plan. We request the draft plan be withdrawn and rewritten.

Regardless of the process followed from this point, the following advice on the draft should be read as FMC's view of an appropriate way ahead for Aoraki/Mount Cook National Park.

National parks

We are at our best as a people when we create and maintain national parks. We agree to let nature simply be, in acts of collective intent, and we delight in the results.

As New Zealanders, we are invested in and connected by our national parks. We carry them in our hearts and minds, support them with taxes and in kind, and enjoy re-creation - in the old sense of the word - in their mauri.

These treasured places' intangible value increases as wilderness increasingly faces defeat elsewhere. By compact, we tread lightly.

The far-sighted National Parks Act 1980 encapsulates our nation's love and respect for the places we have made and will make national parks, and our enduring determination to uphold their physical and ethical integrity.

National Parks Act 1980

In constructing this submission, FMC has referred closely to the principles of the National Parks Act 1980:

Section 4

- (1) 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) It is hereby further declared that, having regard to the general purposes specified in subsection (1), national parks shall be so administered and maintained under the provisions of this Act that-*
- (a) they shall be preserved as far as possible in their natural state:*
 - (b) except where the authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated:*
 - (c) sites and objects of archaeological and historical interest shall as far as possible be preserved:*
 - (d) their value as soil, water, and forest conservation area shall be maintained:*
 - (e) subject to the provisions of this Act and to the imposition of such conditions and restrictions as may be necessary for the preservation of the native plants and animals or for the welfare in general of the parks, the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be received from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features.*

Conservation Act 1987

National parks' management is also governed by the Conservation Act. We note, in particular, distinctions made in the section describing the Department of Conservation's functions:

Section 6(e)

To the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism.

General Policy for National Parks

We have also closely consulted the General Policy for National Parks, which was established under section 44 of the Act, and whose introduction says:

They [national parks] are places where human interference, modification and control should be minimal, and enjoyment of them should be on nature's terms.

We note the following policies:

8.1 Planning and management in general

8.1(c) Planning and management for recreation and other opportunities for the benefit, use and enjoyment of each national park should:

- i) preserve national park values, including natural quiet, as far as possible;*
- ii) minimise adverse effects, including cumulative effects, on national park values;*
- iii) provide for a range of experiences to enable people with different capabilities, skills and interests to have the opportunity to benefit, use, enjoy, and gain inspiration from national parks; and*
- iv) maintain the distinctive character of recreation in New Zealand national parks, including the traditional New Zealand backcountry experience with its ethos of self-reliance.*

8.3 Hazards to people

8.3(a) People are responsible for their own decisions on risks they are prepared to take in national parks and for ensuring that they and, generally, those in their care, have the level of skills, competence, and the equipment required to cope with those risks.

9 Accommodation and related facilities

9(a) Accommodation and related facilities in national parks may be allowed for public use, including accommodation provided by recreation clubs with open membership, and educational services that relate to national parks, consistent with outcomes planned for places.

Matters relating to the draft generally

The following are specific high-level issues and issues applying to the whole draft. They will not be addressed again in this submission except where we wish to make a particular point.

Recommendations follow.

The outdoor community

Groups and individuals with long histories of intimate knowledge of and care and advocacy for AMCNP are barely represented in the draft, yet, for many, the area is turangawaewae; respect for the park is essential and offense caused to it is unacceptable.

Climbers, other recreationists, naturalists, and New Zealanders generally - and their rich histories and living cultures at Aoraki should be properly and proportionately acknowledged, described, and provided for in the plan.

Provision should be made for consultation with the outdoor community where new developments or redevelopments are proposed. The result will be a richer and more capable plan.

The Department of Conservation's Statement of Intent

Aoraki Huanui Rau policy 1 is *...to achieve the objectives set out in this Plan, and the natural heritage intermediate outcomes and relevant stretch goals as detailed in the Statement of Intent.*

However, the Departmental statement of intent does not fall from conservation legislation; indeed, its 'Vision', *New Zealand is the greatest living space on Earth*, is an ambiguous slogan produced by a former government. The statement is non-statutory in terms of the AMCNPMP and, therefore, as an irrelevant consideration, should not have a role in it or any other national park management plan.

Objectives

FMC believes there should be interpretive consistency at management plans' high levels. This is particularly important where parks are contiguous, such as is the case with Aoraki/Mount Cook and Westland Tai Poutini.

However, while the Aoraki/Mount Cook draft says ***Objectives** describe how the Department intends to achieve the outcomes for the Park and for each Place. They support national directions...*, the draft Westland Tai Poutini National Park Management Plan says, ***Objectives** describe what the Department wants to achieve within the Park that are consistent with the intrinsic worth and values...*

These definitions are different in many respects, which could lead to difficulties for park managers and users. Consistency is required.

Intrinsic worth

Preservation, in perpetuity, of special areas for their intrinsic worth is at the heart of the National Parks Act 1980. FMC notes, also, that New Zealand is a secular State.

Presentation of Aoraki and other peaks as personifications is fitting for the plan's background information only, as the mountains have intrinsic 'mountain-ness', the result of millions of years' worth of geological development.

As the purpose of perpetual preservation for intrinsic worth carries an obligation to allow naturally-occurring things within parks to persist as themselves, anthropocentric aspects of the draft should be restricted to scene-setting information only.

Directives and milestones

The draft plan makes insufficient commitment to actions that clearly express the Act and General Policy, for example, preservation of native plants and animals and extermination of introduced plants and animals. Where an activity is unequivocally consonant with the statute, then imperative verbs should be equally unequivocal (for example, *will, protect*). Likewise, if activities addressed by the plan are clearly discordant with national park values, or limits are necessary to protect values,

it should be stated unambiguously; the plan should not in any way allow or encourage inappropriate activities.

FMC understands that some flexible imperatives (for example, *encourage, advocate*) are necessary for certain adaptability, but their use should be minimised in favour of unambiguous directives with milestones that ensure timely action.

Draft milestones are placed with an apparent randomness that is difficult to understand. Planned activities should have clear pathways for implementation marked by appropriate milestones for action and reporting.

Graphic presentation

The draft is reasonably well supported graphically; Place symbols, Kai Tahu designs, and impressive photographs are part of this. However, while the photographs represent the park's grandeur well, they overlook AMC's smaller-scale but nevertheless vital elements - plants and animals whose protection is a statutory priority. Maps, appropriately, are of areas of significance; however, they lack definition.

The plan's photographs should represent the park's intrinsic components appropriately. All maps, including those showing the park in the context of other public conservation land, and those depicting planning constructs, should have high definition.

Broad context is important; further mapping that shows AMCNP within the nationwide systems of national parks and World Heritage areas should be provided.

Natural values

It is clear that the statute and General Policy intend the Department to perform the fundamental roles of preserving native plants and animals and exterminating pest plants and animals (NPA section 4(2)(b)). FMC acknowledges that, above and beyond this, non-Departmental groups' and individuals' involvement can be valuable; however, there should be no implication that such groups, whose commitment and skill will inevitably be uncertain, should be core parts of delivering that work.

Semantics

Words and phrases such as *safe, quality* (as an adjective), *world class, exceptional, and high quality* are used throughout the draft with no clear indication as to what is meant.

As such vocabulary can have significant impacts on the plan's interpretation, reference should be made to the Act and General Policy to determine meanings of words and phrases such as the above in the AMCNP context.

The phrase *visitor experience* is open to a wide interpretive range as it is used in the draft. It should be linked to present publicly-agreed visitor management zoning; in particular, independent recreationists' nature-on-nature's-terms experiences, which are unambiguously provided for by the NPA, the CA, and General Policy, should not be downgraded.

Climate change

As a plan for management for preservation in perpetuity, for an area's intrinsic worth, by a government agency whose purpose is conservation, it is surprising that the draft does not address climate change beyond the level required of non-conservation-focussed organisations. It is even more surprising that this absence occurs in a draft plan for a park in which the effects of anthropogenic climate change are highly pronounced.

The plan should include clear guidance for immediate action that will contribute to reduction of anthropogenic climate change.

Soundscapes/Tranquillity and aircraft

FMC appreciates the work done to date on soundscaping and Tranquillity related to aircraft activity. However, we see numerous problems associated with the concept as it presently stands, and with proposed landing zones, and with the proposed approach to aircraft in general. They are that:

- * as a national park, AMCNP should have a very high level of genuine tranquillity.
- * Tranquillity is incomplete in that it relates to aural tranquillity perceived anthropocentrically only. With statutory direction that AMCNP's intrinsic worth is to be preserved in perpetuity, it is essential that effects of aircraft activity on wildlife and other natural elements of the park are properly understood and factored into Tranquillity.
- * even if an anthropocentric perspective is the only one considered by Tranquillity, effects of aircraft on visual and general cognitive tranquillity (for example, aircraft in motion or stationary on ridgelines) should be understood and accounted for also (the present plan's explanation P4.3.3(c) and (d) that *effects on the enjoyment, inspiration, recreation and other benefits that visitors gain from the Park, including knowing one is in a place into which aircraft are not allowed to fly or land* are in accordance with the Act and should remain conceptually in the updated AMCNPMP).
- * in terms of carbon emissions and contribution to anthropogenic climate disruption, aircraft activity presents further challenge to genuine tranquillity. This is a vital issue that needs resolution (as per above sub-section on climate change).
- * Tranquillity as a tool is substantially incompatible with visitor management zoning, a system that has provided reasonable degrees of certainty and satisfaction, yet visitor management zoning has undergone no evidence-based publicly-notified review. Such a process should take place before any system changes are made.
- * in relation to the present operative plan, the draft plan would allow much more activity and many more landings over greatly-expanded and additional areas of the park. No explanation is given as to how this would be consonant with the relevant statutory tools.
- * in many parts of the park where natural quiet - remoteness - presently prevails, there would be no ongoing certainty of that genuine tranquillity if the proposed model were adopted.
- * even if/when all issues were resolved, all aspects of Tranquillity would need rigorous monitoring. FMC questions whether resourcing exists for this extensive task.

A highly conservative precautionary approach is needed in relation to aircraft activity, at least until all aspects of Tranquillity are resolved and compatibility with visitor management zoning is achieved. This should mean not changing the present operational plan's aircraft provisions (it is worth noting present Aircraft and Airports policy 4.3.3(c) says *No approval should be given that*

would increase aircraft activity or aircraft noise within the park), with only minor amendments to cater for recreational landings where glacial recession has made access truly difficult and cable or walkwire access is unfeasible, and at new or relocated hut sites where consonant with visitor management zoning.

Further, FMC believes reductions in aircraft activity will be needed over time in accordance with General Policy 10.6, to properly meet statutory requirements and public expectations of national park values' management.

Judicial-grade GPS systems should be requirements for operators taking off and/or landing within AMCNP.

As indicated above, FMC acknowledges positive aspects of the Tranquillity mechanism developed to date and believe it could support aspects of visitor management zoning and has value as a potential monitoring tool.

All concessions for taking off from or landing at Mount Cook Aerodrome should be subject to flight movement provisions that improve aural tranquillity including Tranquillity mechanisms.

Additional comments are made under Place headings.

Public hut booking systems

Care should be taken to ensure self-reliant recreation and New Zealand's backcountry culture of welcoming all comers to huts and providing shelter from the storm prevail.

A significant consideration is the weather's extreme changeability, which means that making, and making good on, bookings at many of AMCNP's huts will always be matters for flexibility.

A further factor is that the easy access of Mueller Hut means it is being treated as backpacker-type bookable accommodation; the large numbers of international tourists staying there often treat bookings as conveying an entitlement that is at odds with backcountry generosity. Loss of the egalitarian culture of the hills is significant, hard to reverse, and could result at any hut that is made overly easily-accessed.

For these reasons, huts that are challenging and rewarding to reach on foot should in general not be made easier to access than at present, and hut booking systems should not be established for any public huts except front-country easy-access huts that are under heavy pressure. Where a hut booking system is put into place, it should prioritise non-commercial users.

Public to have right of entry

As noted above, section 4(2)(e) of the National Parks Act is clear that the public have the right of entry. FMC also notes General Policy 8.1(c)(iii), which says a park should: *provide for a range of experiences to enable people with different capabilities, skills, and interests to have the opportunity to benefit, use, enjoy, and gain inspiration from national parks.*

It is essential that this is not taken out of context. The statute directs that the AMCNP's natural values, including natural quiet, are to be preserved in perpetuity, This applies to the whole park, including its easily-accessed areas.

The greater the protection given to natural values, including natural quiet, in easily-accessed areas, the easier it is for the public to experience national park values in those areas without making demands on other parts of the park. Conversely, the more the plan allows natural values to be compromised in those front country places, the more visitors will be compelled to move to other parts of the park to experience those values (which, assuming ongoing permissiveness in planning, would then face compromise).

The plan should focus strenuously on protection of all the natural values (non-commercial, ecological, landscape, aural, visual, etcetera) of AMCNP, including in its front country areas, to enable all visitors, including in easily-accessed parts of the park, to experience those values.

International tourism

The most significant development since the present AMC plan became operative is growth in international tourism. Its impacts on AMCNP are many, from those related to high numbers on the ground to the aural and visual pollution of scenic flights carrying small numbers of people. While some factors in this expansion are outside the influence of the AMCNPMP, many are within its ambit, particularly those involving commercial demand.

It is axiomatic that AMCNP was created for the same reason it is desired by tourism - for its striking naturalness and beauty - and that inappropriate tourism will, perversely and inevitably, negatively rebound on those intrinsic qualities.

As tourism's pressure is expected to grow, the Act and General Policy should be kept in plain view; the park's intrinsic values and non-commercial recreation must have priority, which will likely involve making harder planning calls than may have been needed in the past.

Responding to international tourism's pressure on AMCNP should be a matter of what the park is capable of supplying rather than of meeting demand. The plan must reflect that by planning for constraints to visitor activity that compromises AMCNP's intrinsic values.

Foot access

Challenges to natural values' integrity and to access in AMCNP are clear and present and must be met head-on. International tourism and the overlapping issue of the collapse of ice and snow, in part due to anthropogenic climate disruption, are major features of these challenges.

In order to protect national park values, tourist trail development should not exceed provisions outlined for Places for the life of the plan.

Increasing physical difficulty of access should not be used to validate further air access unless it is absolutely necessary. Indeed, because anthropogenic climate change is inimical to AMCNP values' preservation in perpetuity for their intrinsic worth (see *Climate change* above), and to ensure planning for the park is consonant with the statute and General Policy, provision should be

made to reduce access by aircraft and to improve simple access for self-reliant recreationists (see *Soundscapes/Tranquillity and aircraft* above).

Basic foot access should be fostered and where practicable in line with the Act and General Policy. It should cause as little alteration to the landscape as possible; for example, by the marking of trailheads and essential stream crossings, and establishment and maintenance of basic cables and walkwires.

Set aside neves as specially protected areas

In order to protect the high conservation and recreation values of AMCNP, the park's neves should be set apart as specially protected areas under section 12 of the NPA.

Permits for access to these areas (section 13) should be for genuine conservation management, reserach, mountaineering, and emergency purposes only. Waste removal should be a requirement.

Recommendations:

- * **that the AMC area's history, including that involving the outdoor community, be acknowledged and described proportionately.**
- * **that the Departmental Statement of Intent not be part of the plan.**
- * **that the plan's definition of objectives be consistent with that of other national park plans, especially the Westland Tai Poutini plan.**
- * **that anthropocentric references to natural elements of AMCNP other than human elements be confined to background statements.**
- * **that directives make unambiguous commitments to action that are in accordance with statute.**
- * **that milestones set out unequivocal action and reporting pathways for planned activities.**
- * **that the park's range of natural elements be graphically represented in the plan.**
- * **that maps be reproduced with higher definition.**
- * **that mapping depicting the park in national parks and World Heritage areas contexts be included.**
- * **that the plan make clear that the Department has responsibility for core work relating to preservation of natural values.**
- * **that where words and phrases such as *safe*, *quality*, *world-class*, and *high quality*, and others are used, there is semantic clarity in accordance with the statute and General Policy.**
- * **that assessment of visitor experience be related to present visitor management zoning.**
- * **that the plan include a position on, and immediate actions for, contributing to reduction of anthropogenic climate change.**
- * **that the present operational plan's aircraft provisions remain in place with only minor amendments where glacial recession has made access genuinely difficult at least until issues relating to Tranquillity and visitor management zoning are resolved.**
- * **that previously-agreed visitor management zoning should prevail at least until an evidence-based publicly-notified review has taken place.**
- * **that reductions in aircraft activity be planned for.**
- * **that judicial-grade GPS systems be requirements of aircraft taking off and/or landing within AMCNP.**

- * that all concessions for taking off from or landing at Mount Cook Aerodrome be subject to flight movement provisions including Tranquillity mechanisms.
- * that huts should not be made easier to access than at present.
- * that hut booking systems should not be established for any public huts except front-country, easy-access huts under heavy pressure.
- * that where a hut booking system is established, it prioritises non-commercial users.
- * that protection of all natural values in all parts of the park be planned for to enable all visitors to experience national park values.
- * that a supply-focussed approach to tourism activity be planned for to ensure preservation in perpetuity of the park's intrinsic worth in accordance with the Act and General Policy.
- * that tourist trail development not exceed provisions outlined for Places.
- * that, as far as possible, basic foot access should be fostered.
- * that the neves be set aside as specially protected areas with permits available for conservation, research, mountaineering, and emergency purposes only.

Part One: Kei Te Putake o Aoraki te Mana e Huna Ana

Vision for Aoraki/Mount Cook National Park

1. The content of the boxed vision statement is largely consonant with the Act and General Policy, but its paragraphs should be reorganised to reflect the statute's and General Policy's priorities; natural values' intrinsic worth must, inherently, come before human appreciation of them.
2. The paragraph *Conservation protects New Zealand's natural capital. Conserving and protecting our natural resources and heritage is an essential investment in New Zealand's long-term wellbeing and prosperity* should be removed or adapted to eliminate economic references as the Act does not mandate them and they therefore have no place in the plan, especially not at such a high level.

Recommendations:

- * that the boxed vision statement be re-organised to more accurately reflect national park priorities.
- * that the paragraph *Conservation protects... prosperity* be removed or adapted as described above.

A living Treaty partnership

1. Traditional management can inform current practice in highly valuable ways but should be incorporated into present management practices only where it is consistent with up-to-date comprehensive relevant technical expertise.
2. To be in accordance with the statute and to ensure the park remains pristine and in good health, protection of its intrinsic worth should be an explicit priority of this section.

Recommendation:

*** that this section's objective, policies, and milestones be amended to include the above advice.**

1.1 Aoraki Matatu

1. For the plan to have enduring dignity, its korero should be measured and accurate. FMC believes the wording of this section requires honing generally. In particular, we question the prudence of language that suggests all people aspire to the *leadership attribute of being a leader among others*. While such a generalisation may have no direct impact on AMCNP's management, its arguability has an indirect negative effect on the entire draft.

Recommendation:

*** that the language of 1.1 Aoraki Matatu be recrafted as per the above advice.**

1.2 Aoraki Huanui Rau

1. In the introduction to this section, self-reliant recreation that is consonant with the park's preservation in perpetuity for its intrinsic worth should be addressed separately from commercial activity.
2. Natural heritage objective 1(a) should aim for preservation and protection of all indigenous species, habitats, and ecosystems in natural states.
3. In natural heritage objective 1d), *all* should replace *significant*.
4. Natural heritage policy 6 should have a related short milestone.
5. A natural heritage policy additional to policy 6 should prohibit feeding exotic plant species to pastoral animals in the park, effective immediately.
6. An additional natural heritage policy, potentially policy 14(c), should specifically address *threats posed by human activities*. Actions on this should be expressed in short and longer-term milestones.
7. Natural heritage milestones should be in accordance with the statute's direction in section 4(2) (b): *except where the Authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated*.
8. Natural heritage policy and short and longer-term milestones concerning study and effective management of pest guilds/ecology should be considered and, if of benefit to the park and/or more widely, included in the final plan.
9. History policy 11 should be amended to provide nuanced direction on the implications of the spreading of ashes and how ashes can be spread with appropriate courtesy if it is a strong wish

of an individual or group with intimate connections with the area. Outright prohibition is unlikely to be effective.

10. History policy 12(b) should be adapted to: *the structure, utility, or facility is readily available for public use where this is culturally appropriate and environmentally feasible.*
11. Where applications for retention of existing structures, utilities, and facilities are made, it is inappropriate to require *adaptive reuse* of them where they are functioning in accordance with the Act and General Policy. History policy 12(e) should be altered to remove the general requirement of adaptive reuse.
12. History policy 12(g) *the activity promotes the health and safety of the public and communities* is irrelevant to the Act and General Policy - indeed, it is abrasive to General Policy 8.3(a) - and should not be included in the final plan.
13. The 1.2.3 recreational values statement that *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* is acceptance of, and buy-in to, a tragedy of the commons, in FMC's view. Endorsing not just maintenance of, but growth in, carbon-emitting activity in pursuit of ice whose shrinkage is largely caused by carbon emissions is unequivocally not in accordance with national park principles.
14. Protection of natural quiet is in accordance with the Act and General Policy. Natural quiet is part of the *intrinsic worth* of the park and enables the public to receive the benefits of *mountains, forests, sounds... lakes, rivers, and other natural features* (NPA s4(2)(e) - it is unfortunate that *sounds* was omitted from the draft plan's page 45 quotation). Advice provided in *Matters relating to the draft generally* on soundscapes/Tranquillity and aircraft should be used to inform 1.2.3 recreational values.
15. The outdoor experiences objective should be expanded to express the significance of the park to the outdoor recreation whanui.
16. The statute contains no economic mandate and prioritises preservation of the park's intrinsic values. Therefore, outdoor experiences policy 2(b) should be amended to: *visitor investment planning processes that consider carrying capacity...*
17. Visitor numbers that can overwhelm intrinsic values have become a reality and indications are that numbers will grow for some time at least. An additional outdoor experiences policy should provide for natural environmental constraints to human activity to prevail to protect the park's intrinsic worth.
18. Outdoors experiences policy 4 should be rewritten as: *Work closely with kaitiaki runaka and recreation groups...* Business groups' involvement should allowed only after such korero has taken place.

19. Outdoor experiences policy 8 should be amended to ensure public notification occurs for any non-Departmental accommodation and/or related facilities proposals.
20. Outdoor experiences policy 10 should be altered to ensure only that hut usage monitoring takes place. The draft wording *the need to implement a booking system* is a blunt, presumptuous response to a complex raft of issues and, if implemented, could have negative consequences; it should, therefore, be removed. See our advice on *Public hut booking systems in Matters relating to the draft generally*.
21. The engagement values objective should be rewritten to replace *New Zealanders and businesses* with *People and organisations* in accordance with General Policy wording (General Policy 3 3(a)).
22. We question the usefulness of engagement values policy 6. *Reducing barriers to participation* with no caveats would not necessarily support preservation in perpetuity of AMCNP's intrinsic values. This draft policy should not be included in the final plan; engagement values are sufficient without it.
23. The park's intrinsic values are already under pressure. Rather than encouraging new concessions that, while less harmful (*sustainable or eco-friendly tourism initiatives*) than existing ones, would still be harmful to some lesser degree, existing concessions should be required to improve their practices. People considering applying for new concessions for activity in AMCNP should understand that their wants are unlikely to be met. Engagement values policy 7 should be rewritten to express this.
24. Engagement values milestones 3 and 9 should be rewritten to replace *community and business groups* with *people and organisations* as per General Policy wording.
25. Engagement values milestone 7 needs to have a better aim than sheer numbers of partnerships; engagement consumes Department resourcing and must be sufficiently of benefit to national park values to warrant those resources. The milestone should be rewritten to require engagement to be of demonstrable benefit to national park values over and above the Department's completion of its core work on its own.

Recommendation:

*** that the above proposed actions and alterations to the draft AMCNPMP be adopted.**

He Kapua Kei Ruka i a Aoraki - Whakarewa, Whakarewa

1. It is not a fact that *people of importance should be able to choose how engagement with them occurs due to the mana and respect they hold within their communities - you cannot simply demand a meeting with a raka-tira*; it is a questionable assertion and inappropriate for a New Zealand national park management plan. The whakatauki should either be reworded or replaced as an introduction to this section of the plan.

2. Where park access is to be restricted or closed, except in emergency situations, stakeholder groups including FMC should be consulted. Potential causes for closure *the welfare in general of the park, public safety, and cultural safety* need to be consistent with the Act and General Policy and clarified in the plan. 1.3.1 general management policy 1 should express these points.
3. Public behaviour in a national park should be of a standard consonant with its values' preservation for their intrinsic worth. Ordinary visitors to AMCNP should be *expected* to comply with care codes, and businesses operating there should face sanctions if they fail to comply with them. 1.3.1 general management policy 2 should set higher expectations than *encouragement* of compliance with care codes. This approach largely reflects the statute's section 60 (Offences in parks).
4. FMC supports 1.3.1 general management policy 11. It should be noted that in order to avoid visual pollution and warning signage fatigue, hazard information should be placed sparingly.
5. General management policies relating to visitors and recreation facilities should be clear that *publicly available* and other similar phrases do not describe absolute public availability. Despite the implied openness of 'publicly available' facilities, in reality, there are constraints to availability, including: high costs of some facilities; the physical challenge of getting to others; the need for climbing/hunting interest and relevant equipment/skill/etiquette for access to others; club membership for access to others; and, applying to all facilities, space limitations.
6. 1.3.1 general management policies 12(a) and (b) are too narrow in their approach to provide optimal outcomes where accommodation and related facilities are under pressure. Factors to consider are that each facility has a different cultural profile and serves different purposes, and that a range of constraints to supply (such as allowing natural environmental constraints to prevail, and ensuring aircraft landings don't encourage impossible demands on huts) other than a booking system make bespoke answers to visitor pressure at all locations possible. These policies should express this. Additionally, see our advice on *Public hut booking systems* in *Matters relating to the draft generally*.
7. 1.3.1 general management policy 12(c) should consider additional points made below in our comment on general management policy 13(g).
8. Where 1.3.1 general management policies relate to *reconstruction*, and/or *relocation* of public recreation facilities (policy 13), definition of these activities is needed. AMCNP's terrain is dynamic and, on occasion, significant maintenance and site shifts may be needed for basic facilities' retention; these should not be defined as *reconstruction* and/or *relocation* as this could put the facilities' futures at risk. Provision for moveable sites would be beneficial.
9. 1.3.1 general management policy 13(a) should include a further point: *maintaining the visibility and recognition of alpinists and their history*.
10. 1.3.1 general management policy 13(a)(iv) should be amended to: *a focus on managing supply and use in the front country*. It is unclear what *consolidation of existing backcountry facilities*

means; this statement should be clarified and should not lead to a decrease in opportunities for backcountry recreationists.

- 11.1.3.1 general management policy 13(a)(v) should be amended to: *facilitating basic foot access into areas where use has declined due to natural processes and a changing landscape*. A general management policy allowing for establishment of cable or walkwire recreational access and basic marked walking routes where feasible would be helpful and in accordance with the statute and General Policy.
- 12.1.3.1 general management policy 13(g) should be reworded; inexperienced visitors should not be inappropriately *encouraged* into the backcountry in the first place.
- 13.1.3.1 general management policy 13(i)(iii) should not apply to existing facilities that receive routine maintenance and work that supports their retention. This should be read in conjunction with point 8 in this section.
14. The club huts listed in Table 3 are modest and well maintained at standards appropriate for their type, historical values, and ongoing recreational cultural and practical purposes. Requiring maximum and general public occupancy of these huts, which were established for regular but not constantly maximised use by groups with particular equipment, skills, and etiquette, would mean they would and could no longer be fit for purpose. Basic New Zealand recreation must not be compelled to step aside for international tourism. The huts' ongoing operation in their present and long-standing formats, including accommodation for non-club and club mountain users, is consonant with, among other policies, General Policies 8(1)(c)(iv) and 9(a). Draft 1.3.1 general management policies 14(b), (c), and (d) should not be included in the operative plan. Authorisation should allow the clubs ongoing management of their huts subject to appropriate maintenance and their provision of accommodation for other mountain users.
15. Club huts other than those listed in Table 3 should be managed according to advice in point 14 in this section.
16. Caroline Hut, privately-owned at present, should be permanently open and available, and should be usable by the public at the same cost as public huts of a similar standard. It should not be in private ownership beyond concession expiry in 2020.
17. 1.3.1 general management policy 17 should ensure that where monitoring and management of facilities for *visitor experience* occurs, it is against criteria derived from national park values and existing visitor management zoning.
18. In relation to 1.3.1 general management policies 19, 20, and 21, we note that: overnight use is more demanding on environment and facilities than day use; General Policy supports facilities development outside the park rather than inside it; New Zealand recreationists make regular use of White Horse Hill; some campervans' size means they take up disproportionate space; and the benefit of charging a parking fee can be offset by the need for extra staffing and environmentally abrasive infrastructure. These considerations should be taken into account.

19. General Policy 8.6(d) says *Jet skis and other powered personal watercraft should not be used in national parks*. This should apply to any waterbodies added to AMCNP as part of this plan review.
20. A *limited supply situation or opportunity* should be determined by multi-disciplinary technical assessment of effects on the park's intrinsic values (including non-commercial recreational, ecological, landscape, aural, visual, etcetera). Whether those values can cope with further concessionary activity and, if so, what kinds of activity, should also be matters for those with expertise in the park's intrinsic values (FMC's view is that further commercial activity is inadvisable; see, for example, *Public to have right of entry*, *International tourism*, and 1.2 *Aoraki Huanui Rau* point 22 above). 1.3.1 general management policy 23 should express this.
21. Authorisations should include concession conditions that recognise and protect New Zealand alpine recreation history and culture.
22. 1.3.1 general management policy 26 should be adapted to include conditions in all concessions to provide information and interpretative material on New Zealand alpine recreational history and culture.
23. 1.3.1 general management policy 27 should have *unless otherwise occupied* removed because it is difficult to predict occupation (self-reliant recreationists may arrive at huts at any time).
24. Where 1.3.1 general management policy 30 says, *If evidence shows adverse effects are occurring, consider options to avoid, remedy or mitigate...*, replace with *If evidence shows adverse effects are occurring, halt the activity until technical assessments are complete and recommendations can be made; these may include additional restrictions or cessation of the activity*.
25. FMC supports the concept of a bylaw on waste removal (1.3.1 general management 31(c)(i)), particularly in relation to mountaineering on the park's neves (see comments in *Set aside neves as specially protected areas* above) but questions, firstly, whether a blanket approach for all parts of the park is appropriate, and secondly, whether the community is ready to accept such a bylaw (widespread non-compliance could be harmful to the general standing of the plan).
26. FMC supports 1.3.2 additions to national parks policies 1, 2, 3, 4, and 5; timelines to their achievement should be shorter than proposed in 1.3.18 milestones.
27. Draft aircraft policy would treat flights and landings more liberally than the present plan does. As stated earlier, FMC acknowledges that the Tranquillity tool, as developed to date, could help with mitigation of some anthropocentrically-perceived impacts and provide a basis for monitoring those, but it has substantial, possibly unremediable, flaws. We acknowledge that landings at some additional sites would significantly aid recreational access where glacial recession has made foot access difficult or impossible and where access by cable or walkwire is unfeasible. Our advice is to remain with the present operational plan's guidance on aircraft,

with amendments as stated in *Soundscapes/Tranquillity and aircraft in Matters relating to the draft generally*, and in Place sections.

28. 1.3.3 aircraft policy 3 should include: *mechanisms to avoid adverse effects on wildlife*; and *mechanisms to avoid adverse effects on recreational values*.
29. 1.3.3 aircraft policy 5(d) should not allow for tourism activities in the guise of activities for cultural purposes.
30. The present operative plan's policy 4.3.3(i) *To allow non-commercial hang-gliders, parapents, and parachutes to land or take off within the park* is in accordance with the statute's and General Policy's support for quiet self-reliant recreation, and, indeed, with those users' long-standing respected and respectful place in AMCNP. Draft 1.3.3 aircraft policies 5(e)(i) and 9(b) would not be in accordance with the Act or General Policy, and would add superfluous and impractical constraints to recreational hang glider and paraglider pilots' activities; they should be removed. A global concession should be granted to allow NZHGPA pilots to take off and land on all public conservation land including in AMCNP; it should be planned for in this process and made a short-term milestone.
31. 1.3.3 aircraft policy 9(a) should be removed because: hang gliders and paragliders have a long presence in AMCNP as quiet self-reliant recreationists and their prohibition would not be in accordance with the Act, General Policy, or the present operative plan as per point 30 above; air space users' safety is already provided for through Civil Aviation Authority protocols; civil aviation law allows hang gliders and paragliders to fly in the Tasman valley; and pilots could not guarantee avoidance of the area concerned because their craft are non-motorised and dependent on atmospheric conditions.
32. 1.3.3 aircraft policy 10 should not allow for tourism activities in the guise of commercial filming and photography, or of sporting or other competitive events.
33. 1.3.3 aircraft policy 11(c) should not allow for tourism activities in the guise of activities for cultural purposes.
34. 1.3.3 aircraft policy 12 should state explicitly that monitoring will be related to robust baseline data.
35. 1.3.3 **aircraft** policy 12 *If the monitoring shows* (b) should be removed, because Tranquillity - including carbon tranquillity - is incomplete and unproven, and because of the raft of potential impacts. The more disruptive activity takes place in the park, the less likely it is that AMCNP's intrinsic worth will be preserved in perpetuity in accordance with the Act and General Policy.
36. 1.3.5 bolts and fixed anchors policies are largely very workable and likely to support activity that respects national park values. We question the value of policy 3, however (we assume it refers to sport climbing) as such barriers could prompt sport climbers to ignore the plan's requirements. We believe it may be more beneficial to ensure technical information and

environmental care codes are prominent and that the NZAC is supported in leadership on the matter. References to relevant care codes should be made and the codes appendicised.

37. 1.3.10 guiding activities policy 1(c) needs considerable tightening. A *group* needs definition; the number of guides a group has, and therefore the number of clients in a group, appear to be unlimited in the present wording. Additionally, care should be taken to ensure single concessionaires or groupings of concessionaires with multiple guiding businesses do not cause proliferation in guided activity settings. For every policy concerning concessionaire activity, actual numbers allowed should be clear and unequivocal.
38. 1.3.14 structures, utilities, and facilities policy 2(e) relating to *health and safety of the public and communities* is unnecessary.
39. 1.3.14 structures, utilities, and facilities policy 3 should allow advisory signage only within the Nohoaka Place and at the airport, and no business promotional signage anywhere in the park.
40. 1.3.15 vehicles policy 7(f) needs tightening. Potential provision of *facilities*, especially associated with overnight use, with relation to consideration of new opportunities for vehicle use, is inappropriate for this national park setting. FMC believes a strong precautionary approach is needed.
41. 1.3.16 watercraft policy 4 should not allow for tourism activities in the guise of activities for cultural education purposes.
42. Aerially-assisted trophy hunting is questionable environmentally, ethically, and in terms of its impacts on recreation. Animals can be scattered, pushed into forested areas, and run to exhaustion; considerable annoyance can be caused to self-reliant recreationists. Private safari hunting is available outside the park. The minimal positive effect of slightly reducing pest animal numbers does not outweigh the negative effects on other users and on other park values. In FMC's view, aerially-assisted trophy hunting is not consonant with national park values and 1.3.17 wild and game animal policy 3(b) should not be in the plan.
43. As the Tranquillity tool is incomplete, as noted in *Soundscaping/Tranquillity and aircraft in Matters relating to the draft generally*, and incompatible with present visitor management zoning, which has not been through an evidence-based publicly-notified review, 1.3.18 milestones 4 and 7 should be rewritten. They should concern the review and monitoring of: interim continuation of the present plan's aircraft activity provisions; provision for some additional landings where recreational access has become genuinely difficult and cable or walkwire access is unfeasible; the general down-scaling of aircraft activity in AMCNP; and the effectiveness of Tranquillity mechanisms implemented compulsorily by operators using Mount Cook Aerodrome and voluntarily by operators not using it.
44. 1.3.18 milestone 11 should have a earlier completion date.
45. 1.3.18 milestone 13 needs a completion date, which FMC believes should be earlier than five years away.

Recommendation:

*** that the above proposed actions and alterations to the draft AMCNPMP be adopted.**

Part Two: Whaia Ka Paeroa Ka Tae Ki Aoraki

2.1 Nohoaka Place

1. A crucial feature of Nohoaka Place is the visitor centre, whose design and displays represent national park values and the values of AMC well. It is operated by people with understanding of the park and is not primarily a commercial centre. In these respects, Departmental responsibilities for conservation education and advocacy are being met appropriately. The plan should provide for the visitor centre to continue in this way.
2. 2.1.3 Nohoaka Place outcomes should include the ongoing visibility and presence of alpine endeavour and its history and culture, in the village and throughout.
3. In order to retain adequate flexibility to respond to changing circumstances (for example, central Government's transport policy may boost public transport use), 2.1.3 Nohoaka Place front country and roads outcomes' second paragraph should say, for example: *A range of parking and transport options allows for well-connected transport flows and reduced congestion in the Village and at front country arrival points.*
4. The 2.1.3 Nohoaka Place front country and roads outcome's paragraph concerning club huts should be reworded to ensure huts' and clubs' purposes are not compromised by obligations to general public use.
5. 2.1.3 Nohoaka Place village outcomes' first paragraph is difficult to understand, and the second implies significant proliferation of activities many of which could readily take place outside the park. Both paragraphs should be tightened; plan readers should understand clearly that national park values are uppermost and that services are modest.
6. FMC believes the present village footprint should not be extended, regardless of the amenities area's extent. This is because: the natural environment is visually (including in terms of natural light and dark) and ecologically fragile and, with capacity for visitor facilities' growth outside the park, a heavier human footprint would be an unnecessary, disproportionate environmental burden; the water supply is already stretched and would struggle to cope with further demand; demands on putrescible (presently trucked to Timaru) and other waste management would increase significantly; and because potential highly negative effects of a major earthquake would grow in proportion with any development. Where there is competition for limited space available, the needs of the Department of Conservation and emergency services and the infrastructure that supports them should be prioritised.

7. Paragraph 11 of 2.1.3 Nohoaka Place Village outcomes should be rewritten to ensure the outdoors community who are connected to the AMC area as turangawaewae have their “sense of place” recognised.
8. 2.1.3 Nohoaka Place natural heritage policy 1 should be clear that it is the Department’s role to preserve all parts of the natural environment within the Place, and that the input of others is additional only.
9. 2.1.3 Nohoaka Place spatial plan 4 should not provide for new developments, as per point 6 above.
- 10.2.1.3 Nohoaka Place spatial plan 9 provides for ways of dealing with traffic issues with an appropriate level of flexibility. This should be read in conjunction with points 11 and 12 in this section.
- 11.2.1.3 Nohoaka Place spatial plan 10 and 11 should consider many more aspects of traffic at Aoraki than simply crowding at certain sites. In no particular order they are that: a successful park-and-ride system is mathematically highly complex; New Zealand recreationists arrive at and depart from the park at all hours; shifting parking from AMCNP to a conservation area that used to be part of AMCNP may hold few, if any, benefits for conservation values; a peak-time, optional, free, frequent, enabling park-and-ride system could be attractive to tourists; parking charges’ benefits could be offset by staffing costs and negative environmental effects of infrastructure; carriage of recreational hunters’ firearms and animal carcasses could be problematic; security of unattended holiday-makers’ vehicles would be an issue; overnight visitors’ prioritisation would be perverse in that overnight stays demand more of the environment in terms of water use, waste management, built footprint, and in other ways; young families and people with disabilities may find transferring to a park-and-ride difficult; campervans range in size from an average car’s dimensions to very large; central government’s transport policy strongly encourages public transport use. FMC’s view, considering all the above, is that a light-handed approach is best for the life of this plan. The plan should allow for an optional free peak-time park-and-ride service that is attractive enough to persuade many visitors to use it, for motorhome size restrictions to help keep the largest campervans out of the park, and for central government’s policy supporting public transport growth to have time to bear fruit. A publicly-funded subsidy will be needed to support the public good component. Trial periods for all park and ride designs should be planned for. This comment also relates to 2.1.3 Nohoaka Place policies 13 and 15.
- 12.2.1.3 Nohoaka Place policy 13 should be amended to include recreation groups in consultation processes.
- 13.2.1.3 Nohoaka Place spatial plan policy 16 should be amended as per our advice on club huts in He Kapua Kei Ruka i a Aoraki - Whakarewa Whakarewa point 14 above.
- 14.2.1.3 Nohoaka Place Aoraki Mount Cook Village policies 17-33 should plan for no further development in the village, except for that supporting the village’s general coherence and natural values’ conservation, as per point 6 above.

15.2.1.3 Nohoaka Place policies should recognise the Place's historic sites and plan for their appropriate management (many listed in the present operative plan have not been included in the draft; surprisingly, even Peter Graham's house, Wakefield Cottage, has been omitted). A milestone should ensure this work is achieved in the short term.

16.2.1.3 Nohoaka Place bylaws should express the advice of our point 11 above.

17. Visitor monitoring directed by 2.1.3 Nohoaka Place milestone 8 should assess *satisfaction* in terms of the statute's purpose and General Policy and established visitor management zoning.

18. A park-and-ride feasibility study and recommendations directed by 2.1.3 Nohoaka Place milestone 9, and milestones 11, 15, 16, and 18 should strongly consider our advice in point 11 above.

19. Nohoaka Place milestones 10 and 13 should express FMC's advice on club huts in He Kapua Kei Ruka i a Aoraki - Whakarewa Whakarewa point 14 above.

2.2 Aroarokaehe Place

1. This Place's introductory historic values section needs considerable adjustment. For example, there is no mention of early guides such as Mannering, Green, or Adamson, or even of the 1894 first ascent of Aoraki by Fyfe, Graham, and Clarke, yet Fluerty, who was not born until 1903, is written about at disproportionate length.

2. 2.2.2 Management considerations (recreational values) should include encouragement of visitation outside peak seasons and times only if departmental multi-disciplinary specialists support it as it could lead to undesirable outcomes such as intrinsic ecological values' inability to recover from peak season visitor pressure.

3. 2.2.2 Management considerations (recreational values)' proposal of re-designing the Hooker Valley Track will be helpful if it enables re-introduction of environmental features such as micro-topography to distribute walkers, provide variety, and focus attention on the valley's small- and grand-scale features.

4. 2.2.2 Management considerations (recreational values) should include construction of a new walking track only if Departmental multi-disciplinary advice supports it. FMC's view is any such built trail would likely be at capacity quickly, and that natural values could be affected negatively. However, rudimentary marking of rough routes' trailheads and crucial points would be welcomed by self-reliant recreationists capable of using them.

5. 2.2.2 Aroarokaehe Place recreational outcomes should express advice given in point 4.

6. 2.2.2 Aroarokaehe Place recreational outcomes should not impose hut booking systems at huts other than Mueller and the to-be-reestablished Hooker Hut as per advice in *Public hut booking systems* in *Matters relating to the draft generally*.

7. Recreational hang gliders' and paragliders' presence in AMCNP is longstanding and in accordance with the Act's and General Policy's supportive stances on self-reliant recreation (see points 30 and 31 in He Kapua Kei Ruka i a Aoraki - Whakarewa, Whakarewa above). The craft are silent and, at high altitudes, can be flown by significantly skilled pilots only. The rising air currents which allow hang gliders and paragliders to remain airborne and to explore the sky exist largely within 1 nautical mile of the mountains, because the mountains themselves create the rising air; therefore, these pilots must fly in relatively close proximity to the mountains in order to gain the necessary lift. FMC believes the 2.2.3 Aroarokaehe Place recreational values outcome that would establish a 1 nautical mile no-fly zone around Aoraki/Mount Cook should apply to powered aircraft only and allow the recreational hang gliding and paragliding community to fly in the vicinity of Aoraki/Mount Cook and soar on the lift it creates.
8. *where this is safe* should be removed from 2.2.3 Aroarokaehe Place outcomes' *Foot access into the backcountry is fostered where this is safe, enabling those with the required skills and fitness to experience more remote areas of the park.*
9. 2.2.3 Aroarokaehe Place recreation policies should express the advice of point 4 above.
- 10.2.2.3 Aroarokaehe Place recreation policies should allow for establishment of a Hooker valley hut to replace Gardiner Hut.
- 11.2.2.3 Aroarokaehe Place policy 7 should replace the word *camping* with *sheltering* or something similar.
12. The matter of potential aircraft landings at Pudding Rock crystallises the clash between the statute's direction of preservation of intrinsic value in perpetuity and demands for increased ease of access and commercial activity at AMC. The park's intrinsic magnificence is manifest in the upper Hooker yet commercial activity inherently compromises national park values to some extent. At Pudding Rock, the abrasion between those natural values and aircraft activity would be irreconcilable. The present operative plan, in line with the Act and General Policy, appropriately gives this area aircraft-free status, meaning that anyone going there encounters nature on its own terms. This should continue. 2.2.3 Aroarokaehe Place policy 10(b) should be removed.
13. 2.2.3 Aroarokaehe Place policy 12(b) should recognise that backcountry etiquette is an expectation at all huts and that sometimes people will need to stay more than two consecutive nights at Mueller Hut and that sometimes there will be more people than bunks, for a variety of legitimate reasons. Appropriate flexibility should be provided for.
- 14.2.2.3 Aroarokaehe Place policy 13(b) should be amended to express FMC's advice in *Public hut booking systems in Matters relating to the draft generally.*
- 15.2.2.3 Aroarokaehe Place milestones 2, 5, and 6 should be amended to express advice in point 4 above. Visitor experience monitoring should be linked to present visitor management zoning.

16.2.2.3 Aroarokaehe Place milestone 3 should be amended to express advice in *Public hut booking systems in Matters relating to the draft generally*.

2.3 Haupapa Place

1. Refer to *Matters relating to the draft generally* for advice on aspects of 2.3.2 management considerations relating to natural, recreational, and engagement values.
2. The 2.3.2 recreational values management consideration of a Tasman Glacier View loop track could be helpful in visitor management but direction of travel should be optional.
3. The 2.3.2 recreational values management consideration of a bridge across the lake outlet is worth investigation. Existing hydrologists' reports on the Tasman valley related to the Tasman Valley Road upgrade will likely be useful; additionally, landscape, ecological, and engineering specialists' assessments should be sought.
4. The 2.3.2 recreational values management consideration of providing very easy access to the true left of this Place needs careful consideration. Factors include that: it would support people on the A2O cycle trail; visitors prepared to walk up the true left of the Tasman River from Mt Cook Station will find access to this semi-remote area quiet and relatively easy; and that removing the present moderate challenge of getting to the area would damage its semi-remote ambience.
5. FMC cautions that the 2.3.2 management consideration of encouraging visitation outside peak seasons and times should be conditional on Departmental multi-disciplinary specialists' support as it could lead to undesirable outcomes such as intrinsic ecological values' inability to recover from peak season visitor pressure.
6. The 2.3.3 Haupapa Place recreational values outcome including *good facility development and design* should make clear what these words mean. FMC believes that, in accordance with the statute and General Policy (which says *human interference, modification and control should be minimal, and enjoyment of them [parks] should be on nature's terms*), the outcome statement should result in modest facilities that ensure the park's intrinsic natural features predominate.
7. 2.3.3 Haupapa Place recreational values outcomes should include a bridge across the Tasman River outlet as per point 3 above if it is supported by Departmental hydrological, ecological, landscape, and engineering advice.
8. 2.3.3 Haupapa Place recreational values outcomes on public hut booking systems should be in accordance with our advice in *Public hut booking systems in Matters relating to the draft generally*.
9. it is inappropriate for a national park, which is to be preserved in perpetuity for its intrinsic worth, to be subjected to activity and noise normally associated with built-up places and where it is not essential. *Aircraft activity within Haupapa Place is high* is an inappropriate outcome; FMC

recommends it be changed to express our advice on *Soundscapes, Tranquillity, and aircraft in Matters relating to the draft generally*.

- 10.A 2.3.3 Haupapa Place policy and milestones allowing for a new mid-Tasman hut, to be designed and built by the NZAC, should be included.
- 11.2.3.3 Haupapa Place policy 2 should be guided by our advice on *Soundscapes/Tranquillity and aircraft in Matters relating to the draft generally* and our point 37 in He Kapua Kei Ruka i a Aoraki - Whakarewa Whakarewa.
- 12.2.3.3 Haupapa Place policy 5(c) should set a maximum operating noise level for powered watercraft; it should be conservative in order to protect national park values, particularly in this environment in which natural acoustic baffling is minimal.
- 13.2.3.3 Haupapa Place policy 7 is extremely permissive and, given that much of the area it applies to is presently zoned backcountry remote, inappropriate (no evidence-based publicly-notified review of visitor management zoning has taken place). As per our advice on *Soundscapes/Tranquillity and aircraft in Matters relating to the draft generally*, this draft policy needs considerable adjustment to be in accordance with the Act and General Policy. Landings should remain as at present except where recreational access has become genuinely difficult and cable or walkwire access is unfeasible, and the proposed Tasman Lake Landing Zone (2.3.3 Haupapa Place policy 7(c)) should not proceed because it would be a superfluity that would cause unacceptable noise and visual pollution negatively affecting many visitors.
- 14.2.3.3 Haupapa Place policy 8 is abrasive to the statutory first principle of preservation in perpetuity for intrinsic worth in its extremely permissive approach to aircraft activity in this area zoned backcountry remote. This draft policy should be rewritten to: be in accordance with the Act; recognise backcountry remote zoning of this area (no evidence-based publicly-notified review of visitor management zoning has taken place); support non-commercial self-reliant recreation in accordance with the Act and General Policy; and reflect advice on *Soundscaping/Tranquillity and aircraft in Matters relating to the draft generally*. Additionally, and in line with these points, aircraft landing concessions referred to in the draft should be phased out. Any concession clauses enabling phasing out to occur earlier than the concessions' end dates should be activated; otherwise, letters of intent to not renew the concessions should be sent to concessionaires.
- 15.2.3.3 Haupapa Place policy 12 is appropriate in principle, but should be conditional upon the environment's and facilities' ability to cope with numbers camping.
- 16.2.3.3 Haupapa Place milestones should be amended to reflect above advice on Haupapa Place.

2.4 Pae Tata Place

1. FMC believes that this Place, an area whose management has largely expressed the spirit, intent, and letter of the Act and General Policy, is facing potential management change that

would introduce significant tension with the spirit, intent, and letter of the statute and General Policy. Win-wins - for example, for both remoteness and provision of easy access, and for both recreationists and tourists - are described in the plan draft; our view is that they are unrealistic.

2. The 2.4.3 Pae Tata Place recreational values outcome concerning Tasman Lake outlet access should prompt investigation; see relevant comments in Haupapa Place above. It should be noted that relatively easy foot access is already available from Mt Cook Station on the Tasman River's true left.
3. A policy should be written to express the intent of the 2.4.3 Pae Tata Place recreational values outcome concerning Murchison Hut's reestablishment.
4. It is hard to see how *Guided activities encourage increased appreciation of the spectacular scenery and natural values, and enjoyment of the area while also protecting the experience of other users* (for example, we question how increased commercial aircraft-assisted activity could protect experiences of non-commercial recreational users who have achieved access on foot). This 2.4.3 Pae Tata Place recreational values outcome appears more wishful thinking than potential reality and should be removed or rewritten to be in accordance with the statute and General Policy.
5. The statement *Visitors experience high tranquillity in the majority of Pae Tata Place, with medium tranquillity between the Liebig Dome Landing Zone and the lower Haupapa/Tasman Glacier valley* is at odds with the proposed increase in aircraft use. See point 7 below.
6. 2.4.3 Pae Tata Place policies 1 and 2 should be in accordance with principles applying to remote zoning (no evidence-based publicly-notified review of visitor management zoning has taken place). See also point 37 in He Kapua Kei Ruka i a Aoraki - Whakarewa Whakarewa.
7. 2.4.3.Pae Tata Place policy 3 is very permissive of aircraft activity, particularly given the area's backcountry remote visitor management setting (no evidence-driven publicly-notified review of visitor management zoning has taken place). As per our advice on *Soundscapes/Tranquillity and aircraft in Matters relating to the draft generally*, this draft policy needs considerable adjustment to be in accordance with the Act and General Policy. Landings should remain as at present except where recreational access has become genuinely difficult and cable or walkwire access is unfeasible.
8. 2.4.3 Pae Tata policy 3(b) would put excessive pressure on Onslow and Liebig Huts and their surrounds; it is inappropriate. See point 6 above.
9. 2.4.3.Pae Tata Place policy 4 is abrasive to the statutory first principle of preservation in perpetuity for intrinsic worth in its extraordinarily permissive approach to aircraft activity in this area zoned backcountry remote. This draft policy should be rewritten to: be in accordance with the Act, recognise backcountry remote zoning of this area (no evidence-based publicly-notified review of visitor management zoning has taken place); support non-commercial recreation in accordance with the Act and General Policy; and reflect advice on *Soundscaping/Tranquillity and aircraft in Matters relating to the draft generally*. Additionally, and in line with these points, aircraft

landing concessions referred to in the draft should be phased out in this Place. Any concession clauses enabling phasing out to occur earlier than the concessions' end dates should be activated; otherwise, letters of intent to not renew the concessions should be sent to concessionaires.

10. It is appropriate that 2.4.3 Pae Tata policy 5 supports non-commercial recreation. Concessions should use landing sites, rather than landing zones (see our advice on *Soundscaping/Tranquillity and aircraft* in *Matters relating to the draft generally*).

11.2.4.3 Pae Tata Place policy 6 is inappropriate and unnecessary (see *Public hut booking systems* and *Soundscaping/Tranquillity and aircraft* in *Matters relating to the draft generally*).

12.2.4.3 Pae Tata Place policy 7 is unnecessary (see point 11 above).

13.2.4.3 Pae Tata milestone 1 is unnecessary (see points 11 and 12 above).

2.5 Pae Tawhiti

1. We note the draft's 2.5.1 description and values statement: *Commercial hunting... still occurs, and the Godley catchment is viewed as a critical location for these business opportunities*. This statement is inappropriate for a backcountry-remote location in a national park whose preservation in perpetuity for its intrinsic worth is prioritised (more inappropriately, without either a limit on the number of concessionaires or on the total number of people potentially involved, potential for commercial expansion would be effectively limitless). The statement should be removed.
2. FMC believes Departmental responsibility for extermination of introduced pest animals in accordance with the Act is obscured where 2.5.2 natural values management consideration says, *Tahr are present in high numbers in this area and pose an issue for control without aircraft access for hunters*. The statement should be amended to rectify this.
3. Regardless of the Godley valley road's designation, it should remain freely open for public vehicular access.
4. FMC would like to see marking of a single vehicle route up the Godley valley to Separation Stream. Marking should be maintained. It will help maintain a functional route and minimise negative effects on other parts of the riverbed.

Recommendation:

*** that the above proposed actions and alterations to the draft AMCNPMP be adopted.**

Conclusion

New Zealanders' understanding that national parks' intrinsic worth will be preserved in perpetuity and that non-commercial recreational access to national parks will endure is based on their trust in the spirit, intent, and letter of the National Parks Act 1980 and the 2005 General Policy for National Parks, and the Department of Conservation's faithful implementation of these. It is important that this trust is maintained.

We note the words of Kerry Marshall, New Zealand Conservation Authority chair when the General Policy was adopted. They are imprinted in the foreword: *The bottom line, of course, is that national parks are preserved and maintained in perpetuity. We must be ever vigilant to ensure that this basic tenet is not massaged or eroded.*

Our view of the draft Aoraki/Mount Cook National Park Management Plan is that: it does not genuinely express the spirit, intent, and letter of the statute or General Policy, largely because of its accommodation of commercial interests related to international tourism; and that necessary detailed knowledge of the park's history and culture is inadequate.

FMC recommends withdrawal of the present draft plan and for a new draft to be written; the existing document is too flawed in large and small ways to be a sufficient basis for a final version.

At the very least, FMC strongly urges reconsideration of all aspects of the draft Aoraki/Mount Cook National Park Management Plan that would see the park's bottom line - its intrinsic values' preservation and maintenance in perpetuity - massaged or eroded.

Yours sincerely,

Jan Finlayson,
Federated Mountain Clubs vice-president and executive member responsible for FMC's submission on the dAMCNPMP.

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