



**Abel Tasman National Park Draft Management Plan –  
Submission**

5 May 2006

## Executive Summary

1. This submission by TIA comments on the Abel Tasman National Park (ATNP) Draft Management Plan of January 2006. Meetings and forums were held between February and April 2006 with TIA members who operate tourism businesses in and around the ATNP.
2. TIA endorses the overarching vision and objectives of this plan relating to:
  - a) preservation of the park in its natural state;
  - b) preservation of the park's cultural and historic heritage;
  - c) protecting the coastal environment; and
  - d) guaranteed public access compatible with the above objectives.
3. TIA understands the key proposals as outlined in the Plan's executive summary, are to:
  - a) manage visitor numbers by controlling commercial activity so that national park values are preserved;
  - b) set out seven Recreational Setting Zones to control visitor numbers in the park;
  - c) set desired levels for concession activities that are consistent with the outcomes sought for each Recreational Setting Zone;
  - d) protect native plants and animals;
  - e) require pest control on islands and mainland areas where natural values are highest; and
  - f) permit mountain biking activity where it is permitted under the General Policy for National Parks 2005.
4. TIA notes that the objectives and proposals are consistent with legislative requirements, notably the National Parks Act 1980, the General Policy for National Parks 2005 and the Nelson/Marlborough Conservation Strategy.
5. As the smallest, but most visited national park in New Zealand with estimated visitor numbers of 150,000 annually, TIA is aware of the importance of preserving the natural values of the park for future generations. At the same time, it is mindful of the Park's economic value to the Nelson/Tasman region and its importance within New Zealand's tourism industry and its importance to the livelihoods of the DOC concessionaires operating within it.
6. TIA welcomes the opportunity to appear at a future hearing in support of this submission.

## Background

### Conservation and Tourism

*“...enjoying public conservation lands and waters is a popular activity for many New Zealanders and overseas visitors, and outdoor recreation is often perceived by many to be central to our identity and way of life...”<sup>1</sup>*

1. The tourism industry supports balanced conservation management policies that sustain economic development, provide a social return for New Zealanders and allow memorable visitor experiences to be delivered. Sustainable tourism businesses that provide a high quality product are dependant on a collaborative working relationship with the Department of Conservation (DOC).
2. New Zealand’s environment and scenery is a major draw card for overseas visitors forming the basis of the “100% pure” marketing brand, which underpins the country’s gross domestic product (GDP) and economic growth. The land, sea and air operators that have concessions to use the national parks and public estates ensure domestic and international visitors are able to enjoy New Zealand’s natural environment and it is essential that this access is continued. Tourism businesses also invest and develop public amenities and infrastructure that improve the quality of the visitor experience.
3. TIA supports the following principles for conservation management:
  - a) polices that sustain economic development and tourism businesses while protecting the environment in which they operate;
  - b) legislation interpreted and applied in a way that leads to the achievement of a mutual relationship between use and conservation;
  - c) lands that provide an economic and social return to New Zealand in a way that is consistent with the values that New Zealanders place on them;
  - d) a fair rate paid by concessionaires for use of public lands to run their businesses in return for a fair consultative process and fair and reasonable treatment in the management of that land;
  - e) meeting visitor expectations of excellence by insisting concession holders meet industry quality standards to deliver world class visitor experiences;
  - f) ongoing and robust review of DOC’s research priorities and capabilities so future decisions are always made on a sound evidence basis;
  - g) policies that are cognisant of the variety of effects imposed by each user group and the nature of benefits they receive from this use; and
  - h) consistent New Zealand-wide conservation management policies and standard operating procedures that acknowledge locally justified variations

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<sup>1</sup> General Policy for National Parks, New Zealand Conservation Authority, April 2005, p.7.

4. TIA acknowledges that visitor numbers are growing and increasing the pressure on the natural resources and infrastructure of New Zealand's national parks and public lands and believes it is vital that DOC continues to work closely with the tourism sector to effectively manage this growth. In many cases we believe the issue is one of under-management rather than overcrowding – prescriptive limits are one tool, but a stronger more effective one is collaborative management that seeks operational and facility based solutions. In this way a park's visitor-carrying capacity can be increased to meet demand without increasing social or environmental impact.
5. TIA believes that mutual acceptance of the above principles lays the foundation for a sound and effective working relationship with DOC, based on a “no-surprises”, consultative approach to the management of issues as they arise, as well as encouraging free and frank discussion. It is essential that conservation management strategies or plans in all thirteen Conservancies are disseminated appropriately, at a national level, and are consistent with legislative requirements.
6. The submission on the ATNP Draft Management Plan is consistent with the above stated aims of TIA for a balanced conservation management strategy that acknowledges the contribution tourism makes to the economy along with the need to preserve New Zealand's natural environment for future generations.

## Overview Comment

*“...the purpose of this management plan is to preserve Abel Tasman National Park in perpetuity for its intrinsic worth and for the benefit, use and enjoyment of the public...”*

7. TIA recognises and compliments DOC on the level of consultation it has undertaken during the development of the ATNP Draft Management Plan. Despite the lack of a cohesive operator user group with which to consult, it has significantly exceeded their legal obligations. DOC has provided opportunity for individuals as well as local and national tourism organisations to seek clarification and express their views on the plan.
8. TIA also wishes to acknowledge Latitude Nelson CEO Paul Davis for his role in actively assisting and advocating for a strongly consultative process. TIA believes that the level of facilitation undertaken by Latitude Nelson is nationally significant as a best-practice model - TIA will be advocating for such an approach to be adopted by all Regional Tourism Organisations (RTOs).
9. Our association believes the linkage provided between the RTO, DOC, operators and national tourism organisations is vital and should exist permanently, not only during management plan development. TIA will continue to communicate to DOC nationally and at Conservancy level, the benefits of strong, ongoing tourism/DOC relationships.
10. In order to achieve the vision and objectives that DOC has set in this Draft Management Plan, TIA believes the challenge in the ATNP is to successfully manage visitor flows during the peak summer months, traditionally from December to February. For the remainder of the year, ATNP is quieter with fewer visitors and thresholds are not required. We therefore support DOC's proposal to encourage demand in the shoulder and off season, while also pointing out the difficulty of

influencing well entrenched holiday patterns that are driven by many factors over which there is often little control.

11. TIA strongly supports the formation of concessionaire user groups. It believes that a user group will streamline the consultative process, bring consistency and help cement a collaborative approach to Park management as well as assisting DOC and concessionaires in the future. Examples of successful user groups already exist and TIA is happy to facilitate via its membership base the development of an Abel Tasman user group with support from Latitude Nelson and DOC.
12. Our association has already signalled its concern over confusion resulting from running separate Park and Foreshore plans. TIA supports Latitude Nelson's proposal for DOC (and other agencies) to establish one overarching agency that coordinates concessionaire management in the wider Abel Tasman area and believes that the integrity of this plan would have been enhanced if combined with the Foreshore Plan.

## Analysis

13. TIA has the following comments with regard to specific clauses in the ATNP Draft Management Plan.

### 4.0 Natural and Historic Heritage Preservation

#### 4.1 Indigenous Species and Ecosystems

4.1.4.5 (5) p.66 states *“endeavour to obtain Specially Protected Area status for Tonga Island and Pinnacle Island in order to close them to the public, for the protection of seal breeding colonies”*.

14. At least one of our members currently operates under a marine mammal watching permit in the adjacent marine reserve. While the plan does not indicate a future threat to this activity, we wish to signal support for the retention of existing permits.

### 5.0 Access and Use

#### 5.1 Visitor Management

5.1.1.1 p.79 states *“...the public has the general right of free access to the park, but the Department also has the ability to limit access if necessary to protect the natural values of the park”*.

15. TIA is concerned that limiting commercial activity during late December to mid January is not being matched by similar controls on freedom visitors. We believe that placing limits on concessionaires, but not other user groups is inequitable, and will also not solve the challenge of social overcrowding during this peak period.
16. Additionally, those individuals who travel with commercial operators simply because they have no other means of access are effectively discriminated against by any restriction on numbers.
17. TIA acknowledges that placing limits on freedom walkers and kayakers in the ATNP may not be consistent with legislative criteria allowing free and open access to national

parks. The development of a visitation management plan for freedom visitors only to cope with a short period of high use in the peak season could be in the long-term sustainable interests of the businesses which operate in the ATNP and those who visit it. DOC needs to work with all user groups during the life of the plan to address this issue.

18. Inequity between controls on concessionaires compared to little or no control on private users is a national one. TIA is committed to working with DOC and other stakeholders to seek solutions.

5.1.1.9 (7) p.86 states “***Retain the existing bylaw prohibiting aircraft landings in the park and advocate to the Civil Aviation Authority for an increase in the minimum flight level over the Park.***”

19. TIA does not support this implementation clause. Feedback received indicates the need for some prepared helicopter landing sites to cater for emergency evacuation, fire fighting and/or other management functions. A decision on the sites could form part of the Hazard Management Plan development referred to in clause 7.1.13 p.153.
20. A prescriptive approach to airspace management has already been investigated in other national parks and discarded in favour of formal codes of practice and the development of strong working relationships with aircraft user groups. A range of noise mitigation measures are available to aircraft operators including changes of routes, altitudes and the addition of ‘quiet’ technology.
21. No research has yet been undertaken to assess the impact of aviation on the Park and even if this showed cause for concern, we believe the Department should approach the issue in a less prescriptive manner.

5.1.1.9 (8) p.86 states “***Seek a bylaw to prohibit electronic devices that emit noise (e.g. personal radios) in the park, except at Totaranui Campground.***”

22. TIA is opposed to this clause. Operators make extensive use of VHF radios as an operational tool and for emergency communication. Commercial and private users benefit also from weather reports received by radio.

5.1.2.4 p.92 states “***Overnight stays in huts and at campsites are restricted to two consecutive nights at any one facility, throughout the year.***”

23. TIA believes this clause is at odds with DOC’s aim of encouraging Park use during the shoulder and off-season. We support a change to the clause that relaxes the two night restriction for the eight months (April – November) when the Park is relatively quiet.

5.1.2.11 p.94 states “... ***The Department should advocate to Latitude Nelson, the New Zealand Tourism Board, the Ministry of Tourism, travel publications such as the Lonely Planet Guide...to manage the promotion of Abel Tasman National Park in a way that is consistent with the recreational opportunities the park is being managed for.***”

24. TIA agrees with the view that promotional material/public information should ensure visitors have realistic expectations. We support Latitude Nelson’s proposal that a joint DOC/tourism sector communications strategy be developed for the ATNP. TIA is of

the view this will lead to greater promotional consistency and a better visitor experience (based on realistic expectations). It will also assist with Park management.

5.1.4.1 p.99 states ***“The islands are managed primarily for their natural values...No concession activity”***. .

25. Our association questions the logic of permitting private users onto some islands while not permitting concessionaire activity. We believe that the issue is not about the type of user, be it private or commercial, but rather whether access should be permitted or not. It could be argued that small, commercial groups operating responsibly and under strict conditions be given priority over private groups and individuals.

## 5.2 Visitor Facilities

5.2.1.5 (2), p103 states ***“To maintain the toilet, hut and camp capacity of the park at existing levels, in line with the Recreation Opportunities Review (2005).”***

26. TIA is concerned that the plan appears to consider the current facilities adequate with DOC not intending to modify the existing facilities during the life of the plan. The ability of the current toilet facilities to cope at peak times is already questioned and with the proposal to restrict access points, the situation may be exacerbated. TIA believes the plan should remain flexible in regard to improving facilities – adequate, well considered facilities are a management tool that can improve visitor experience and reduce environmental impacts. Research undertaken during the life of the plan may at an early stage point to the need for improved facilities in certain locations.

## 5.3 Concessions

27. In commenting on concessions, TIA supports the vision and primary objectives documented on page 10 of the plan. It is very concerned, however, that the policy and implementation proposals, particularly those involving limits, are not backed by sound research. From our discussions with operators, it appears some limits on commercial activity at peak times are in the best interests of the ATNP and its many users. We seek assurance from DOC that limits, especially as they apply to kayak operators, are developed in a collaborative manner and ‘err on the high side’ until research indicates more clearly the actual situation.
28. From our discussions with concessionaires, it appears there is a growing need for shorter trips that cater for school groups and the less physically able, particularly in the area from Watering Cove to Tinline Bay. TIA is anxious the ATNP plan may ‘lock in’ management strategies that need either ‘tweaking’ or more major changes. It appears that the plan once adopted is not easily changed and while the proposed regime of access points seems to reflect current reality, it is still a very rigid restriction.
29. Given the importance of the access points to concessionaire operations and the successful ‘flow’ of activity over the next 10 years, we ask that the plan allow for greater flexibility in the allocation of access points and that a process for making access point changes without requiring a full Plan review is incorporated into the Plan.
30. With regard to guided walking activity (p.121), we note that in the Coastal Access Points and South Coast Zones group sizes shall be a maximum of 15 plus two guides.

We believe that the Department should consider lifting this to an even number of 16 to reflect current usage.

31. TIA believes DOC needs to re-engage with operators regarding their proposal to not allow guided kayaking in the North Coast zone (p.126). Some kayak operators currently operate in the zone and regard their activity as low impact, safer than freedom kayaking and a source of product differentiation. Other operators believe the zone is too challenging for regular guided trips and support the ethos behind the current proposal. Guided walking with groups of eight plus one guide has been proposed and appears to meet with general support, however, it does create a sense of inequity within the zone between ground and water based activities. DOC may wish to consider a compromise with limited numbers of guided kayak trips involving smaller numbers.
32. A regime of monitoring will be a key management driver over the life of the plan and beyond. The Plan should describe in more detail monitoring type and frequency, its link to management decisions and the financial contribution of operators.
33. The plan is deliberately vague about concession allocation in 2011. Nationally and internationally, it is recognised that businesses cannot operate effectively with only five year business horizons and the additional threat of open allocation. We will be advocating strongly for our members to be given a conditional right of renewal with a term that reflects business reality and encourages concessionaire investment and commitment.

5.3.2.2.1, p.129 states ***“Recreation concession activity should not be permitted in the untracked remote Zone...”***

34. TIA sees no reason for such a prescriptive approach. We believe that future opportunities may exist for limited concessionaire activity that don't threaten the values of this zone. We request DOC leave the door open for concession applications and judge them on their merit at that time.

## **6.0 Community Relations**

### 6.2 The Coast

6.2.5, p.147 states **“The discharge of sewage and the dropping of litter from pleasure and commercial boats adjacent to the park are of concern. There is a requirement for boats to go more than 500m off shore before discharging sewage. The Department should advocate for the active enforcement of this regulation.**

35. TIA believes that 500 metres is far too close to shore and threatens conservation values and practices being espoused by the Plan. TIA believes DOC should advocate for active enforcement and pursue a bylaw that ensures any dumping of sewage is done at a distance where it will not affect water and/or land based users.

## **7.0 Administration, Implementation and Review**

### 7.1 Whole Park

7.1.13, p.153 states “*A Hazard Management Plan should be developed for the Totaranui Campground, given the high level of facilities and the potential for flooding, and others may be required elsewhere in the future*”.

36. TIA supports the urgent need for a hazard and risk management plan for the whole park, not only for the Totaranui Campground. Such a plan should include contingency arrangements in the event of a fire (bush fires have already occurred on the inland tracks with the ATNP), earthquake, flood or tsunami. Details of emergency and evacuation procedures should be available to all visitors.
37. With regard to the implementation recommendations (p.157), TIA believes research/monitoring is a vital component of future management decisions. In addition, the role of a collaborative DOC/concessionaire monitoring effort should be clearly recognised within this implementation section.

## **Recommendations**

Overall, the TIA recommends:

- a) that DOC approach 2011 concession expiry by offering existing concessionaires conditional rights of renewal and terms that reflect business reality;
- b) that sound research and monitoring is a key driver in future ATNP management decisions and is reflected as such throughout the Draft Management Plan;
- c) that additional and/or alternative access points are considered in the Draft Management Plan;
- d) that DOC, TIA and Latitude Nelson develop user group(s) to streamline consultative processes and bring consistency to conservation decision-making in the ATNP;
- e) that DOC and other agencies work with Latitude Nelson to establish one overarching agency that co-ordinates concessionaire management in the wider Abel Tasman area;
- f) that DOC amends the existing bylaw to permit aircraft landings in emergency situations and for other management functions, and changes to airspace are not considered;
- g) the retention of marine mammal watching permits;
- h) that DOC does not seek a by-law to prohibit electronic devices that emit noise;
- i) that DOC amend the current two night hut limit at any one facility to encourage off-season use;
- j) that island access is managed in an equitable manner;

- k) that extra toilet, hut and camp capacity be considered within the life of the Draft Management Plan;
- l) that DOC consult with kayak operators over packet allocations mindful that initial limits are not underpinned by sound research;
- m) that DOC re-engage with operators regarding the proposal to prohibit kayaking in the North Zone;
- n) that DOC implement a Hazard Risk Management Plan for the whole ATNP; and
- o) that DOC pursues a by-law to ensure any dumping of sewage is done at a distance where it will not affect water and/or land based users.

### **Contacts (for discussion on submission if required)**

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### **Appendix 1**

#### **Background Information on the Tourism Industry Association of New Zealand (TIA)**

1. The Tourism Industry Association New Zealand (TIA) advocates for the interests of the tourism industry in New Zealand. The businesses we represent generate more than 85% of New Zealand's tourism-related revenue.
2. Tourism is a \$17.2 billion industry (\$7.4b from international and \$9.8 from domestic tourism) with international tourist expenditure accounting for 18.5% of New Zealand's total export earnings.<sup>2</sup> The industry, directly and indirectly, employs 1 in 10 New Zealanders in a diverse range of businesses – the majority of which are small and medium sized enterprises. Not only is tourism important because of its size, representing 9.4% of New Zealand's GDP, it is:
  - Highly employment intensive;
  - Regionally disparate; and
  - Very diverse - ranging from large stock exchange listed companies to small cottage industries.
3. These businesses cover a range of tourism-related activities – hospitality, transport, adventure and activities, attractions and retail and related tourism services. In many cases, regional tourism businesses have developed around regional assets divested by other industries and have revitalised those assets and the communities that depend on them.
4. The tourism industry in New Zealand consists of more than 8,000 small and medium sized businesses. Of these businesses, most employ less than five people.
5. New Zealand welcomes more than two million overseas visitors to its shores every year. The domestic tourism industry is also important in helping to sustain a vibrant tourism industry. TIA estimates that over 75 million visitor nights are spent by New Zealanders every year.

*Tourism Industry Association New Zealand (TIA)*  
*April 2006*

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<sup>2</sup> “Key Tourism Statistics – March 2006”, Ministry of Tourism website