

Submission form for the Draft Mt Aspiring National Park Management Plan

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Do you wish to present your submission at a future hearing? **Yes (30 minutes).**

Our Submission:

1. The specific part of the Plan that our comments relates to are:	2. Our comment is that:	3. We seek the following decisions:
The Plan as a whole	We generally support the provisions of the draft plan review, subject to comments detailed below.	That no substantive changes be made to the draft plan review, except as detailed below.
Section 2 Treaty of Waitangi Relationships	Generally support (except as suggested below).	Retain as drafted (except as suggested below).
Section 2 Treaty of Waitangi Relationships	It is noted that the three Topuni areas: Mt Aspiring/Tititea, Mt Earnslaw/Pikirakatahi and Te Korokai (Dart/Slip Stream) are referred to in Appendix 1. We consider that the existence of these areas should be made more prominent in Section 2 of the Plan, and on appropriate maps within the plan.	That the three Topuni areas of Mt Aspiring/Tititea, Mt Earnslaw/Pikirakatahi and Te Korokai (Dart/Slip Stream) be specifically mentioned in Section 2, and that these three areas be identified on appropriate maps.
Section 3.1 Introduction	The last line in the second last paragraph describes the outdoor recreational activities that the park offers: "increasing number of visitors for outdoor activities: "mountaineering, tramping, hunting, fishing... etc". This line should include rock climbing . Fantastic pure rock climbing opportunities do exist within MANP and are very popular. The term 'mountaineering' does not necessarily cover the sport of rock climbing as at times there are differing and equally valid values at stake.	Add rock climbing to the list of outdoor recreation activities that take place in the Park.

Section 3.2.5 - Biosecurity and threats	Introduced animals are having <u>ongoing</u> effects upon native flora and fauna within the park. The on-going nature of these threats needs to be recognised in the plan.	That the first sentence of the 4th paragraph of section 3.2.5 be amended as follows: (inserted words underlined): “Introduced animals have had <u>and continue to have</u> significant effects on native flora and fauna...”
Section 3.3 - Historical and Cultural Heritage	In the 6th paragraph (page 23) there is an incorrect reference to Mt Aspiring being first climbed in 1910. This is incorrect, the mountain was first climbed in November 1909.	Correct the reference to the year of the first ascent of Mt Aspiring to 1909.
Section 3.3 - Historical and Cultural Heritage	No mention is made of the history of grazing on eastern side of MANP. This past activity is still significant today as it was a source of exotic grasses and weeds.	Insert words to make reference to the history of grazing on eastern side of MANP, and the consequential effect of the introduction of exotic grasses and weeds into MANP.
Section 3.3 - Historical and Cultural Heritage	No mention is made of the existence of Cascade Hut in the West Matukituki Valley. This was the first hut constructed nationally by the NZ Alpine Club, in 1932, for use by mountaineers. Department of Conservation staff have advised that this hut is now considered to be sited within the park boundary.	Insert words to make reference to the existence of Cascade Hut in the West Matukituki Valley, the first NZAC hut constructed for use by mountaineers.
Section 3.4 Public benefit, Use and Enjoyment	Fantastic pure rock climbing opportunities do exist within MANP and are very popular. The term ‘mountaineering’ does not necessarily cover the sport of rock climbing as at times there are differing and equally valid values at stake.	Add rock climbing to the list of recreational opportunities.
Section 4 Key Management Issues	Generally support wording. Correct representation of management issues.	Retain wording without change.
Section 5 Overall Park outcomes	Generally support wording. Correct representation of overall park outcomes.	Retain wording without change.
Section 6.1 Introduction	There needs to be reference to the role of the Conservation Board and Conservation Authority roles in setting policy. This is important in providing an explanation of the wider context of Management Plan policy development and approval.	Insert words to properly set the scene for and make reference to the roles of both the Conservation Board and Conservation Authority in setting policy for management of the park.

Section 6.1 Introduction	<p>It is disappointing to see the Department continuing to assert the legal myth that the Minister of Conservation has some form of “constitutional role” beyond the decision-making powers defined in legislation, in this case the National Parks Act and Conservation Act. Both of those statutes clearly provide for the Minister’s powers to be restricted or fettered by management plans.</p> <p>The plan should not make reference to levels of delegated decision-making within the Department (note 2 on page 30). Any restriction on delegated powers should be stated in the instrument of delegation.</p>	<p>Amend the text in Section 6.1 to accurately reflect the statutory constraints on the Ministers decision-making powers.</p> <p>Delete Note 1 in Section 6.1.</p>
Section 6.3 Historical and Cultural Heritage	<p>No recognition is given of the existence of Cascade Hut in the West Matukituki Valley. This was the first hut constructed by the NZ Alpine Club, in 1932, for use by mountaineers. Department of Conservation staff have advised that this hut is now considered to be sited within the park boundary.</p>	<p>Insert words to make reference to the existence of Cascade Hut in the West Matukituki Valley, the first hut constructed by the NZ Alpine Club, in 1932, for use by mountaineers.</p>
Section 6.3 Historical and Cultural Heritage Policy 6 (page 51)	<p>Support Policy 6.</p>	<p>Retain policy and wording of Policy 6 as drafted.</p>
Section 6.4.1 Boundaries and additions to the park	<p>Support the inclusion of the ‘Dart Conservation Area’ into MANP. However, we are concerned that policies regarding use of bolts (Section 6.6.7) may not be amended, as we seek, and therefore may adversely affect rock climbing opportunities for visitors to the park. Refer to our submission on Section 6.6.7 of the Plan below.</p>	<p>Retain wording with regards to the inclusion of ‘Dart Conservation Area’ into MANP, <u>subject to amendments being made to Section 6.6.7.</u></p>
Section 6.6 Public Use and Enjoyment	<p>Wording, zoning rationale and zone descriptions are all supported.</p>	<p>Retain wording as drafted.</p>
6.6.3 - Accommodation and Related Facilities	<p>The title of this section is mis-leading, as it includes policies for tracks and other facilities. This section should be renamed to more accurately reflect its contents.</p>	<p>Rename Section 6.6.3 ‘Recreation Facilities’</p>
6.6.3.1 – Public Facilities	<p>Department of Conservation staff have advised that Cascade Hut in the West Matukituki Valley is now considered to be sited within the park, whereas for many years it was considered to be just outside the park boundary. This hut is owned by the NZ Alpine Club, and is authorised by a concession. This hut has been available in the past for public use, mainly as an “overflow” for Aspiring Hut which is located nearby. However there have been on-going issues with public use of this hut, and consideration also needs to be given to its historic value. For these reasons the Club believes that Cascade Hut should be accepted as a private facility within the park.</p>	<p>That Cascade Hut be accepted as a private facility within the park, rather than a public facility.</p>

6.6.3.1 Policy 7	The Aspiring Huts Management Agreement is identified in the Public facilities policy 7. The Agreement includes facilities other than huts eg camping ground and staff quarters adjacent to Aspiring Hut.	That the policy be amended to read: "Continue to work in co-operation with the New Zealand Alpine Club in the management of the Aspiring, Colin Todd, French Ridge and Esquilant Huts and related facilities , subject to the Management Agreement Aspiring Huts (28/08/2004) or any subsequent agreements"
Section 6.6.3.1 - Policy 9	This policy is ambiguously worded, and is hard to understand. Is the 50% stated to be of hut capacity, or 50% of bunks available at a particular point in time (ie, not being used by other parties)? Is this restriction to apply if the bunk space is otherwise not being used? We support a policy that restricts concessionaire use to 50% of bunk space unless not all of the other 50% is being used.	That the policy be amended to read: "50% of the hut capacity. This restriction may not apply if the bunk space is not otherwise being used".
6.6.3.2. Policy 2	This policy seems inconsistent in this section, given that NZAC huts could be interpreted as coming under this policy. NZAC huts appear not to be in the front country zone.	Amend the text to acknowledge that some NZAC huts are not in the front country zone.
Section 6.6.6.2	Department of Conservation staff have advised that Cascade Hut in the West Matukituki Valley is now considered to be sited within the park, whereas for many years it was considered to be just outside the park boundary. This hut is owned by the NZ Alpine Club, and is authorised by a concession. This hut has been available in the past for public use, mainly as an "overflow" for Aspiring Hut which is located nearby. However there have been on-going issues with public use of this hut, and consideration also needs to be given to its historic value. For these reasons the Club believes that Cascade Hut should be accepted as a private facility within the park.	Amend the text to acknowledge that Cascade Hut is a private facility.
Section 6.6.4	The majority of the access to Aspiring Hut is via a vehicle track suitable for mountain bikes. Mountain biking on this route should be permitted. Provision should also be made in the plan review for consideration of mountain bike use in the lower East Branch of the Matukituki valley, and in the lower Dart Valley.	Amend Policy 3 to ensure mountain bike access to Aspiring hut is permitted. Provide for consideration of mountain-bike use in the lower East branch of the Matukituki Valley and Lower Dart Valley.

Section 6.6.5, Table 1	We support the proposed provisions in Table 1 for aircraft landing sites within the park, except for the Bevan Col landing site. Refer our comments on Section 10.4, Policy 1.	Bevan Col aircraft access should be managed with a maximum of 150 landings per year, and no more than 4 landings per day with some flexibility to allow higher numbers of landings after weather constraints. No exclusion periods.
Section 6.6.6, policies 1-6.	<p>The Club supports restrictions, implicit in Policies 1-6, that restrict Jet Boats from the Rees River and other waterways. It is acknowledged that The Dart River (below Sandy Bluff) provides an opportunity for Jet Boat access, and jet boat activity.</p> <p>Jet Boat use on other waterways (including the Dart River above Sandy Bluff) has the potential to significantly affect visual amenity, natural quiet and remote experience opportunities of recreationalists.</p>	Retain Policies 1-6 as drafted.

<p>Section 6.6.7. Bolting and climbing aids.</p>	<p>While it is agreed that Objectives and Policies would be useful to manage bolting (as part of climbing activity) within the National Park, the Club does not agree with the proposed ban on permanent bolting.</p> <p>It is considered that there is no convincing justification for banning <u>all</u> new bolts with the park. Objective 1 (Section 6.6.7) could be applied to huts, tracks or bridges, with the obvious conclusion to be drawn that none of those facilities are acceptable in the Park. Those facilities disturb natural features far more than bolts do, yet they are allowed if they are judged to provide significant benefits, cause acceptable disturbance or have acceptable cultural impact. There is no obvious reason to single out bolts, which if placed correctly, create a trivial disturbance to natural features.</p> <p>Furthermore, the distinction between temporary and permanent bolting is pointless, given that placement of temporary bolts would cause as much physical damage as permanent bolts, and the two usually serve different purposes.</p> <p>NZAC is mid-way through a process of drafting a ‘Bolting Policy’ for alpine and mountain areas. The development of this policy began after the adverse reaction from the climbing community when bolts were placed on NW Ridge of Mt Aspiring/Tititea in early 2008. The Club is taking a leadership role on alpine bolting issues amongst the climbing community. NZAC’s Bolting Policy is aimed to be broad based, clear and promote consistency. As such it is intended to be a vehicle for the control of undesirable bolting and also for advocacy to land managers for the appropriate use of bolts.</p> <p>The development of this policy is progressing well, with wide consultation and engagement with the wider climbing community being undertaken. While the NZAC bolting policy has not been finalized, the Club believes that:</p> <ul style="list-style-type: none"> • Bolts should not be placed where good natural protection is available and the rock is sound. • Use of bolts can provide opportunities for rock climbing in areas where there is little or no natural protection (for use of removable aids) and is appropriate when there is little adverse impact on other park users or cultural impact. • Bolts are only justified if they provide significantly greater benefits than costs to the climbing community and other park users. • In very specific instances the use of bolts might be appropriate as a safety measure on highly frequented alpine routes, where existing fixed protection (slings) already remain in place. • Bolts increase safety and reduce risk for climbers, trampers and guides. • Bolts reduce the amount of slings and other gear festooned at some sites, hence they can maintain or enhance aesthetics. • New bolting of climbs or routes should only be done after consultation with the climbing community and any other stakeholders for a specific area. <p>These principles should form the basis of decision-making on bolting within the park. The policy stance taken in the Fiordland National Park Management Plan should be adopted for the MANP Management Plan. The NZAC Bolting Policy, once finalised, will assist with implementation of that policy and assist the Department in decision making with regards to proposed new bolts within the park.</p>	<p>Section 6.6.7 be revised to recognise the fact that bolting causes minimal environmental impact and is appropriate in some existing areas along with the potential for new areas (or specific points) in the future.</p> <p>The policy stance taken in the Fiordland National Park Management Plan should be adopted for Mt Aspiring National Park, with addition of the principles listed in our comments to assist decision-making.</p>
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Section 6.7.3 - Commercial Filming and Photography	Objective 1 and Policies 1-4 restrict filming activity to the same means of access and conditions as other users. The Club supports these policies which treat all park users equally.	Support wording of Section 6.7.3, Objective 1 and Policies 1- 4.
Section 6.7.6 – Telecommunication Facilities	The wording of the second paragraph, regarding adverse effects, is considered accurate and appropriate.	Support wording of second paragraph as drafted.
Section 6.7.6 – Telecommunication Facilities	Objective 1 and Policy 1 are generally supported (except for comment regarding Policy 1(iv) below). Policy 1 (iv) is not considered necessary. We cannot identify a justifiable reason to site a telecommunication facility within the Olivine Wilderness Area. Policy 1(iv) creates the potential for significant effects upon a Wilderness Area. This opportunity should not be provided for a potential concessionaire. Emergency events requiring a temporary facility would be exempt in any case.	Support Objective 1 and Policy 1, with the exception of Policy 1(iv). That Policy 1(iv) be deleted).
Section 10.2 - Mount Aspiring Climbing Region (Map 6d)	Under the heading ‘10.2 Issues and Threats’, beginning on the last line on page 111, we consider that the description needs to be clarified and corrected. It is stated that “Based on these assessments a maximum total of approximately 500 guided clients per years would be permitted in the area...” If the area has an estimated carrying capacity of 1000 people per year, with 50% potentially available to guided climbers, there should be no more than 500 people in guided groups made up of guides with their clients. In the Plan, as it is presently drafted, there is no recognition of the guides. Presumably this is a mistake. Guided parties vary from 1:1 to 1:4 in this area, so the maximum number should be based on the total number of people in guided parties, not on the number of clients. Refer also to section 10.4, Policy 4 (page 114).	Under the heading ‘10.2 Issues and Threats’ , amend the text to read “Based on these assessments a maximum total <u>of 500 people in guided groups (including instruction courses) would be permitted in the area per year...</u> ”.
Section 10.3, Objectives 1-5	Objectives 1-5 are considered fair, accurate and appropriate.	Support as drafted.

<p>Bevan Col Landings. Section 10.4 , Policy 1(a) and (b) and Table 1</p>	<p>The draft Plan review states that landings at Bevan Col should be restricted to 110 per year, with a possible restriction over the Christmas/New Year and Easter periods, and no more than 4 per day.</p> <p>Departmental records show that landings at Bevan Col have ranged from 96 to 149 per annum over the past 10 years, averaging around 120 per annum. Those records also show that the proposed limit of 4 landings per day would more or less fit with current levels of activity, with occasional days when there have been 5 landings.</p> <p>The Club acknowledges the findings of the Climbers Survey carried out by the Department over the 2006/07 summer season. However, it needs to be recognised that the 2006/07 season was lower than average for landings (98). The survey reports climbers' opinions on restricting landings as being "neutral", which is statistically correct, but masks the strength of the opinions either way. There was a significant increase in negative impacts among those who witnessed more than 5 landings. We consider that it would be realistic to expect much higher levels of negative impact reported if the number of landings was at the upper end of the range (149) – that is 50% more than during the time of the survey.</p> <p>Having said that, the Club is prepared to accept the level of impact associated with 150 landings as being a reasonable limit. 150 landings will allow 300-600 users to fly in, within the overall stated carrying capacity of 1000.</p> <p>With regard to managing the annual quota of landings, we acknowledge that the use of helicopter access to Bevan Col to date has been split roughly 50:50 between amateur and guided parties, and we would expect that to continue. We do have concerns that the Aspiring Region should be managed for its own values, and not treated as being a convenient alternative if conditions limit guided climbing opportunities in the Mt Cook Area (for example).</p> <p>We acknowledge the difficulties that can arise with managing a quota, whether the control should be daily, weekly, monthly, seasonal, or annual - or a combination. The issue will probably be the "spikes" when more than 4 loads of climbers want to fly in on the same day. Will restricting the "spikes" actually reduce potential crowding at Colin Todd Hut or on the mountain, if 4 helicopter loads of people can fly in and head to the hut day after day, compared to a spike of 6 or 7 loads after a weather clearance? And there is concern that "fly-in" parties can get the jump on walk-in parties heading to Colin Todd after a period of bad weather. We support the 4 landings per day as a guideline that should be managed in conjunction with the limited capacity of Colin Todd hut - some people may say that is too hard to manage or enforce, but it would at least provide a basis for DOC to work from, and avoid having to second guess all the possible scenarios for the management plan.</p> <p>In summary, the Club seeks controls that limit future landings to current levels, with some flexibility to enable a practicable and reasonable management regime. We support the annual quota of landings being set at 150, with a limit of 4 landings per day being used as a guideline to assist in managing the limited capacity of Colin Todd Hut. We do not consider that a "no landings" period is required, if the frequency of landings is controlled to low levels as proposed.</p>	<p>Bevan Col aircraft access should be managed with a maximum of 150 landings per year, and no more than 4 landings per day with some flexibility to allow higher numbers of landings after weather constraints. No exclusion periods.</p>
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Section 10.4, Policy 4	As drafted, this policy does not recognise the guides who accompany guided clients. Presumably this is a mistake. Guided parties vary from 1:1 to 1:4 in this area, so the maximum number should be based on the total number of people in guided parties, not on the number of clients.	Section 10.4, Policy 4 (page 114) be amended to read: "... 500 people in guided parties (including instruction courses) per year".
Section 10.4, Policy 5	Policy 5 to allow the opportunity for the capacity of Colin Todd Hut to be increased from 12 to 20 bunks, should the demand exist, is considered reasonable.	Support Policy 5 as drafted.
Section 10.4, Policy 7	<p>The Club opposes aspects of Policy 7. While we acknowledge and respect the cultural values represented by the Topuni status, we are not aware of any concerns that the placement of bolts (as climbing aids) has caused, as compared to any other use or activity within the Tititea Topuni.</p> <p>We consider that use of bolts should be restricted within the wilderness area, and kept to a minimum in the remainder of the Mt Aspiring Climbing Region. Decisions on new bolting proposals should be made in accordance with the principles we have proposed for Section 6.6.7 of the plan. In that regard, it needs to be borne in mind that it is expected that guided parties will comprise 50% of users.</p>	Delete policy 10.4.7, or revise to allow limited new bolting outside of the Wilderness Area, with reference to Section 6.6.7 (also to be revised).
Section 12.4, Policy 1(b)	Concession activities within the Olivine Wilderness Area, under Policy 1(b) are considered satisfactory. This is considered the case given conditions (i) to (iv) which should ensure minimal impact upon other parties within the area, and the Wilderness Area.	Adopt Policy 1(b) as drafted.
Appendix 10	<p>Page 2 of Appendix 10 makes reference to the French Ridge Track, and the appendix states that this track is to be "maintained".</p> <p>It is the Club's view that the French Ridge Track is badly eroded and in need of work that is beyond maintenance. This track requires major work and realignment.</p>	Replace "maintain" with "major realignment".