

Contact Details

Name: Mike Drake, Heather Spence

Postal address: 105 Fairhall Road, RD2, Wakefield 7096

Telephone number: 03 522 4458

Email: mike@mikedrake.nz, heather@heatherspence.nz

Date: February, 2019

Details

Section <i>(Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.)</i>	Submission <i>(Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.)</i>	Decision Sought <i>State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:</i> <ul style="list-style-type: none"> - if supporting: 'retain Policy X' - if opposing: 'delete Policy X' - if seeking changes 'reword Policy X to read (give suggested wording)
General - focus of this submission	This submission has two principal focuses: <ol style="list-style-type: none"> 1. The perceived negative impacts of increasing scope and frequency of air traffic for tourists. 2. Need for objective, measurable targets for all milestones. Without these and without monitoring them, the plan is wasted effort. 	
General - partners' experience in AMCNP	Have all partners involved in developing this plan been in the park's mountains, been recreational climbers/trampers, experienced the solitude and tranquillity that the direction of this plan will negatively impact? Or have they just been up onto a glacier in a plane for a brief period and not appreciated the impact on the intrinsic quality of the AMCNP of increased tourism-aircraft activity, over a wider area than currently permitted?	
General - identifying changes from previous plan	Is it possible to write this plan in such a way that a reviewer can identify the difference between the current plan and the proposed changes?	
General - navigating this plan	One has to keep scrolling back to determine which section at particular point comes under.	Place the current section at the top right. Alternatively, the document could be structured

	<p>Having a heading, for example 2.3.3 Haupapa ... (p132) and then having independent numbering within 2.3.3, eg. Aircraft 7.</p> <p>By having a proper structure the table of contents would have meaning.</p> <p>The only way to reference items is by page number, which will change as the document is modified.</p> <p>A document, like software if written without structure will be difficult to read, maintain. It will become a doorstop, rather than a working useable document.</p> <p>Furthermore, it will cost much time and money, now and in the future, for people to easily understand the content.</p>	<p>that all headings have a reference, eg.</p> <p>Use section numbering to see the structure of the document, and for clear referencing without using page numbers.</p> <p>See below</p> <p>To illustrate:</p> <p>2.3.3 Haupapa Place</p> <p>2.3.3.1 Outcomes</p> <p>2.3.3.2 Policies</p> <p>2.3.3.2.1 Recreation</p> <p>2.3.3.2.2 Guiding</p> <p>2.3.3.2.3 Watercraft</p> <p>2.3.3.2.3.1 Should grant</p> <p>2.3.3.2.3.2 Should grant</p> <p>2.3.3.2.3.3 Should grant no more</p> <p>Having a numbering system that has absolute referencing system. The table of contents will quickly show the structure and any inconsistency with the structure.</p>
<p>General - length of plan</p>	<p>Too Long</p> <p>At one hundred and eighty eight pages this plan is far too large. This plan is put together by paid employees; their time is paid for. The people whose feedback you are seeking have a day job.</p> <ul style="list-style-type: none"> ● the introductory text could be placed in Appendices; ● the five different places create lots of duplication. <p>If the objective of this document is to be a working document and gather feedback from a large number of people; then wethink it has failed dismally.</p> <p>The DOC estate is for people to enjoy; it is not a commercial playground. We have a Labour Government now, so the commercial imperatives to survive under the previous government are no longer valid.</p> <p>However, DOC infrastructure growth is required to meet the expanding tourist population; it needs to be funded by tourists.</p>	<p>Oppose: The long wording of the document and the lack of good structure. It will be a barrier for getting a wide range of feedback.</p> <ol style="list-style-type: none"> 1. When designing such an important document keep in mind the two primary (wethink) objectives: <ol style="list-style-type: none"> a. Write the plan to be a working document, ie. write in plain language for everyone to understand. b. Make it as easy as possible for people to provide feedback.

	Focus must be placed on reducing anthropogenic noise. “Quick-fix” tourists should not compromise the enjoyment of people who use their feet.	
p7 The Journey	Support focus on Treaty Partnership and partner obligations - a good approach. Have individuals and representatives of the three papatipu rūnaka spent time in the region, particularly the remote areas, and experienced the qualities of tranquility and natural quiet that tourism operators have such a huge impact on? That is, do they understand the reality of this plans’ intent for aerial tourism?	
p45	<p>Oppose use of word ‘Tranquility’.</p> <p>You are specifically talking about the noise footprint within that Mount Cook National Park. Noise created by machines; mainly aircraft.</p> <p>Tranquillity (also spelled tranquility) is the quality or state of being tranquil; that is, calm, serene, and worry-free. <i>Wikipedia</i></p> <p>Tranquil (to me) is a state of mind (above). Helicopters passing overhead would disturb my tranquility, as would moving through a crevasse field, or walking down a gully with stones falling.</p> <p>‘Noise’ 26 would be more understood by the many different nationalities visiting the park. If you said that an area had a very high noise level, this would be more readily understood, than saying this area had a very low tranquility level.</p>	<p>Reword, substitute ‘noise’ for ‘tranquility’.</p> <p>Table 2 would then have ‘Noise levels’, rather than ‘Tranquility scale’.</p>
Map 2, p26	<p>Mount Cook National Park needs stand out on the map.</p> <p>The idea is to show AMCP in context. The current map fails in this respect.</p>	<p>Highlight Mt Cook National Park in a standout colour.</p> <p>Remove the heavy boundary, as this is implied if it is correctly highlighted.</p>
Map 3, p29	AMCNP is a more detailed map. Not sure what is attempted to be shown here.	Reword to clarify what this map is trying to illustrate.
1.2.3, p42	<p>Oppose emphasis on heli-skiing/hiking activities.</p> <p>Traditional use of Mount Cook NP was (and still is) for climbers and trampers; people who</p>	Reword to emphasise climbing and tramping are the main activities of the park.

	<p>worked hard to experience the serenity of the park.</p> <p>Heli-skiing/hiking are “recent” introductions. These activities along with glacier landings and overflights for “quick-fix” tourists all impact the serenity sought by the climbers and trampers.</p> <p>I (Mike Drake) have flown into (and out) Tasman Saddle to climb in the area. This we believe is different from people who touch down on glaciers only for a brief moment, photo opportunity etc.</p>	
<p>1.2.3, p42</p>	<p>We find the structure on this section could progress from the climbing history, through to the more “quick-fix” tourist activities, eg. glacier landings.</p> <p>A SCRAP structure would be useful. For example:</p> <p>Situation: There are a wide range of visitors to the park. Those who are prepared and skilled enough to walk into the backcountry and experience the rewards and serenity that this brings.</p> <p>Complications: Other visitors have neither; the time, fitness, motivation or experience to work for the serenity. Overflights and brief landings sought by these tourists impact on the tourists who have worked for their “fix”.</p> <p>Recommendation: Establish more shorter walks to cater for these tourists.</p> <p>Action:</p> <ul style="list-style-type: none"> ● survey tourists to find out what type of non-flight activity would meet their requirements. ● establish walkways ● establish cycleways ● create a rental bike/e-bike outlet <p>Politeness: Suggest other areas for heli-skiing/hiking. People who can afford to pursue these activities should be relocated. Why should their activity impact the serenity of others? This should be a core principle for DOC.</p>	<p>Reword. Apply a SCRAP structure.</p> <p>S - Situation C - Complication R - Recommendation A - Action P - Politeness (may not always be applicable).</p>
<p>1.2.3, p45, 2nd para “at times has been much busier than it is today”</p>	<p>Irrelevant information: Whether aircraft have been busier in the past is irrelevant. Because something has happened in the past doesn’t mean it should happen in the future. Native birds used to be hunted in the past. It is illegal</p>	<p>Delete heli-skiing and heli-hiking activity in the park to achieve Policy 7, by avoiding aircraft movements for non-core activities.</p>

	<p>now.</p> <p>Again, the core principle; Why should anyone’s activity impact the serenity of others? Again, people flying in to Tasman Saddle to climb in the area, is completely different from people landing at Tasman Saddle to set foot on the glacier, take a selfie, then taking off again.</p>	
<p>1.2.3, p47 “ The desired tranquillity outcomes shown in Map 5 describe and represent the desired future state of natural soundscapes across both national parks.”</p>	<p>Oppose use of ‘Tranquillity’</p> <p>As mentioned using the word ‘tranquility’ and now ‘soundscape’ are just ways to confuse the issue. We are talking about ‘noise’ pure and simple.</p> <p>Who decides the noise levels (in your language “desired tranquillity outcomes)? A New Zealand climber/tramper, a DOC bureaucrat, kaitiaki rūnaka, a tourism operator, a “quick-fix” tourist (who wants a selfie on the glacier)?</p> <p>Apart from finding parking space this is the most important issue facing DOC in many areas. We need to keep to simple language and not cloud peoples’ understanding by using woolly words.</p>	<p>Reword. Replace ‘tranquility’ with ‘noise’. Replace ‘soundscape’ with ‘noise footprint’.</p>
<p>1.2.3, p48, Policy 3.b)</p>	<p>We find the Objectives and Policies rather nebulous. Would all DOC staff understand “<i>add value to the visitor experience in the Park, including through opportunities to express the specific importance of the Park to Kāi Tahu whānui</i>”? Would visitors understand this?</p>	<p>Reword. Use plain simple language that is understood by everyone. Also needs to be objective and measurable.</p>
<p>1.2.3, p49, Policies “Avoid, remedy or minimise adverse effects on the qualities of tranquillity and natural quiet, solitude and remoteness where these are important features and expectations of the visitor experience in Aoraki/Mount Cook National Park.”</p>	<p>Again, what does this mean? If you have a defined ‘noise footprint’, operators who compromise this are penalised. There is enough smart technology for monitoring.</p> <p>All non-core activities that do not allow people to experience the natural quiet should be avoided.</p>	<p>Delete non-core activities in the park to achieve Policy 7, by avoiding aircraft movements for non-core activities.</p>

<p>1.2.4, p51</p>	<p>We find the wording in objectives, policies and milestones, again vague. For example, "Identified education and conservation opportunities for youth engagement within Aoraki/Mount Cook National Park (Year 3)."</p> <p>What is the measure? How will DOC know when the milestone has been achieved? How many youth hours?</p> <p>By more clearly defining the milestone, the people responsible will have a better understanding of what is required.</p> <p>If milestones are not clearly defined and measurable they will be totally ineffective.</p>	<p>Have more meaningful policies and measurable milestones.</p>
<p>1.3.1, p55. Waste Management, "educating visitors on the impacts of waste on the Park's natural and cultural values;"</p>	<p>The management of shit (again, using plain language) is a big problem for DOC. A number of foreign tourists and probably some New Zealand tourists do not know how to shit in the woods.</p> <p>When Mike did the NZAC High Alpine Course we carried out our human waste. Mike also did this when he climbed Nuns Veil.</p> <p>NZ alpine courses require participants to carry out their own human waste - why should it be any different for a commercial tourism operator or a tourist?</p>	<p>Recommendation: DOC speak with major airlines bringing tourists to New Zealand to show a video on how to shit-in-the-woods (there is a book with this title). We are sure there is sufficient talent to create a video that will be very memorable. It should make people think about their responsibility when they are about to make a deposit.</p> <p>Again, keep it simple.</p> <ol style="list-style-type: none"> 1. Pack out human waste on glaciers in popular areas; whether guided, or not. 2. Pack out human waste in high usage areas, even if it could be buried in soil.
<p>1.3.1, p57. Visitors and recreation facilities</p>	<p>Support: Idea to segregate campervans and tents.</p> <p>We understand from asymmetric charging on the Great Walks that new Zealanders' are now being able to book.</p> <p>Asymmetric charging needs to be applied to all charges in this park.</p> <p>Money is a good way of modifying behaviour. We would not want to see New Zealanders' greatly disadvantaged by the greater foreign tourist numbers.</p>	<p>Recommendation: User pays needs to be employed more widely; car parks, camping.</p>
<p>1.3.3, p45. Aircraft</p>	<p>Oppose: Planned increase in heli-skiing and aircraft use for tourism in a national park, especially over such a large zone..</p> <p>We are not sure why heli-skiing/hiking have such a high priority and such a large zone. Is a national park the best place to allow a highly mechanical activity? It contradicts all the words at the front of the document; natural quiet,</p>	

	serenity.	
1.3.3.4.b), p65 "for authorised commercial filming and photography, or sporting and other competitive events; and"	Oppose: The use of drones for sporting events. Is a national park the place to hold sporting events that require drones? Is DOC going to allow drone racing (sporting)?	Reward: DOC needs to clarify what sporting events could use drones.
1.3.3.12.b), p66, "the natural, historic, recreation and cultural values of the Park."	Reward: Meaning unclear. Again, we find this document very wordy. It needs structure to be able to be read and be a useable document.	Reward: Clarify language
1.3.18. p79	Milestones are vague; how can you measure success (<i>6. Reported on success of the pack-out of refuse and human waste and level of compliance with the bylaw (Year 6, 8 and 10)</i> when you haven't defined a target. There is absolutely no point in including milestones unless they are objective and measurable, and then measured..	Reward: It would be good to indicate how each of these milestones will be measured. Again, (Ad nauseam) you cannot deem any milestone a success without measures. Clarify: Does it mean that DOC will measure human waste from all of MCNP and use this as the benchmark?
1.3.18.4, p79". Reviewed the aircraft, tranquillity levels and visitor experience monitoring results, and implemented any changes to aircraft landings as necessary (Years 4, 8)."	Does this mean it will be 4 years before this is done, and then repeated at year 8? As mentioned above we should be talking about 'noise', not 'tranquility'.	Reward: Add an Appendix stating how the noise levels will be monitored and what changes could be made to gain compliance, or reduce the noise footprint. DOC needs to show leadership in the management of noise throughout the park (and all national parks). Could self contained audio monitors be placed around the park? The real-time monitoring could be correlated with the aircraft movement based on GPS readings. Again, there is smart technology out there and smart people to create a real-time map of noise footprints.
Part 2, p81	It is appropriate, perhaps to separate the village from the other areas. This is where tourists enter the park. The main problem being creating parking and accommodation. The other places have issues with human waste and noise.	Reward: The Mount Cook National Park is one place; not five.
2.1, p94 Park & Ride	Support. Great idea. P&R and other facilities should be tested for	Provide facilities to allow campervans to stay outside the park. Tourists doing day and even

	<p>there workability by defining use case. That is for each type of tourist ensure that the range of facilities would meet their needs.</p> <p>For example,</p> <ol style="list-style-type: none"> 1. People doing the Copland Pass would perhaps have a driver. They would camp overnight at White Horse Hill Campground. Next day the Copland Pass party would start out and the driver would exit the park. 2. Campervan tourists want to do a short walk and come back to their campervan in the evening. They may want a meal. 	<p>overnight trips, eg. Mueller Hut could P&R.</p> <p>Tourists who are going into the backcountry should not be restricted. They will have lots of gear.</p> <p>Tourists who want to enjoy the bars and restaurants would require a late return back to their campervans. These tourists would park at Reward: Birch Hill carpark - 10min drive by P&R.</p> <p>Perhaps in the not-too-distant future the P&R would be electric driverless vehicles and ordered by an app. An algorithm based on numbers and wait time would determine the pickup time.</p> <p>For overseas tourists it should be expensive to park in the village.</p> <p>No freedom camping should be allowed in the park. A no brainer.</p> <p>Establish Park & Ride from State Highway 8. This would be cheaper than Birch Hill. Charge more for Birch Hill parking. Establishing parking by Highway 8 would keep some vehicles off Highway 80.</p> <p>Both car parks would have to have a level of security, especially for campervans/cars whose occupants will be away overnight.</p> <p>Any infrastructure developed should be paid by tourist revenue.</p>
<p>2.2, p113</p>	<p>This place and the next three places all have similar problems; noise, human waste, access, tourist dispersal.</p> <p>As mentioned previously, "quick-fix" tourists should be eliminated. Touching down on a glacier, then stepping off should be eliminated.</p> <p>Expanding tracks and cycle trails should be the focus. Where access is difficult due to moraines, eg. Copland Pass, then track improvements, safety anchors, ropes should be installed.</p>	<p>Restructure the document to amalgamate the common elements of the five places.</p>
<p>2.2.3, p124, Bylaws, 13, "require people to book before staying at huts other than the Hooker and Mueller huts,</p>	<p>Should this read "Where hut demand exceeds capacity, initiate a booking system.</p> <p>Mueller and Hooker Hut (once relocated) have a booking system.</p>	<p>Reward: Prohibiting people staying more than two consecutive nights is not workable; bad weather or multiple day trips from the hut would create problems with this bylaw.</p> <p>Alternatives:</p> <p>When Mike last used huts in MCNP the beads on</p>

<p>where increasing demand is exceeding the capacity of the hut, and prohibit people from staying more than two consecutive nights.”</p>		<p>a wall indicated occupancy.</p> <ul style="list-style-type: none"> • Foreign tourists (FTs) book and pay for accommodation. Asymmetric charging should apply; • If huts are full, then people have the option on camping, or sleeping on the floor; • New Zealanders’ pay less for huts than FTs; • New Zealanders’ can use their backcountry passes for Liebig Hut and other huts which currently don’t have a fee.
<p>2.3.2, p134, Aircraft</p>	<p>So many. How many of these are the “quick-fix” tourists?</p>	
<p>2.4.3, p143 Aircraft</p>	<p>Oppose: Mike was appalled when he saw that landing zones will be in the Murchison Valley for recreational activities.</p> <p>In 2014 Mike walked up the Murchison Valley (after getting a lift across Tasman Lake) on the way to Arthurs Pass. After a day’s walk we were surrounded by ‘natural quiet’ at Liebig Hut.</p> <p>To think that we would be arriving to experience 20 landings per day would have totally destroyed the experience. We worked hard to earn the serenity; negotiating the lateral moraine between Tasman Lake and Murchison River, then walked up the valley.</p> <p>In ten years time there will be proposed landings zones in the Godley Valley.</p> <p>For DOC to even suggest that they want to maintain ‘natural quiet’, or whatever words are used is a complete contradiction when expanding the noise footprint is proposed.</p>	<p>Reword: Leave the Murchison Valley alone. Do not allow any concessions for recreational flights.</p> <p>You have to be joking; 35 landings per day!</p> <p>Create more walking tracks. Provide a formal bookable service to transport people across Tasman Lake. People could then walk down the Tasman Valley, or negotiate the lateral moraine to walk to Liebig Hut.</p> <p>Look at placing footbridges to cross the Murchison River when flowing high. Although in late November crossing the Murchison River posed no problem.</p> <p>If people can’t walk to Liebig Hut, they shouldn’t be going there, leave it for people who enjoy the serenity, enhanced knowing that they have worked hard to get here.</p>
<p>Conclusion, pNA</p>	<p>If we had the time and patience this submission could have equalled the number of pages in the plan.</p>	<p>We trust from the above that you will have the idea that flying anywhere within the MCNP must have a very worthwhile meaning.</p> <p>Disturbing the enjoyment and serenity of others by having superficial flights (“quick-fix” tourists should be eliminated from all national parks.)</p> <p>Summary</p> <ol style="list-style-type: none"> 1. Employ professional writers to clearly communicate and engage with the intended audience. 2. Structure and condense the document to

		be readable and useable. 3. Have clear measurable milestones. 4. The document should be a working document written to engage people, rather than repel.
Thank You	Thank you for extending the deadline for the submissions. Mike Drake	

Hearing

Do you wish to be heard in support of your comments?	Yes
--	-----