

30 June 2022

Via Email: [cmap@doc.govt.nz](mailto:cmap@doc.govt.nz)

To whom it may concern,

### **SUBMISSION ON THE DEPARTMENT OF CONSERVATION'S CONSERVATION MANAGEMENT AND PROCESSES**

Queenstown Lakes District Council (Queenstown Lakes District Council) would like to thank the Department of Conservation (DOC) for the opportunity to present its submission on its Conservation Management and Processes consultation.

The Queenstown Lakes District Council has been involved in submitting to reviews of various conservation management plans and strategies. The Queenstown Lakes District Council has several points of support, emphasis and recommendation outlined within the submission. Key points include:

- Strong support for all efforts to streamline the review of all statutory documents in conservation management planning.
- Support for the modernisation of the concessions model.
- Support for greater process clarity but cautions against the introduction of new and unnecessary regulations at this time.
- Support for improved data management systems.

Council staff would not like to speak to this submission at any hearings or further discussions that may result from this consultation process. Queenstown Lakes District Council would like to thank the Department of Conservation again for the opportunity to comment.

Please note that this submission reflects the position of officers.

Yours sincerely,



Mike Theelen  
**Chief Executive**

## 1.0 Context

- 1.1 The Queenstown Lakes District is known for its beautiful landscapes and large numbers of visitors to the district each year<sup>1</sup>. Large sections of the district is made up of land owned by the Department of Conservation.
- 1.2 Access and use of Department of Conservation land can be varied. The Queenstown Lakes District is one of New Zealand's premier visitor destinations drawing people from all over the world including for film locations and mountain biking, some of which occurs on Department of Conservation land.
- 1.3 The trails in the existing Queenstown Trails network are one of the most visited and used NZ Cycle Trails out of the country's 22 Great Rides<sup>2</sup> and mountain biking opportunities in the Wakatipu are considered world class<sup>3</sup>.
- 1.4 Queenstown Lakes District Council has an in-Council film office, Film Queenstown Lakes, which works to attract film production to the district, facilitate production requirements, maintain a film-friendly environment, and develop the sector. The film industry in Queenstown Lakes brings an estimated \$35million to the local economy and is considered a key component of the district's efforts to diversify its economy away from overreliance on tourism.
- 1.5 In addition to providing this submission, Queenstown Lakes District Council also supports the submission of the Film Otago Southland collective (of which Film Queenstown Lakes is a member).

## 2.0 Conservation Management Planning

- 2.1 Queenstown Lakes District Council is supportive of all efforts to streamline the review of statutory documents that guide conservation at place.
- 2.2 The Queenstown Lakes District Council has, in the past, submitted to the Otago Conservation Management Strategy review process for cycling trails throughout the district to include the Wakatipu Active Travel Network within the Otago Conservation Management Strategy. Given the popularity of cycling in the district, the approval process could be more user-friendly and efficient. Any changes to the Conservation Management Planning that meets these needs would be supported by the Queenstown Lakes District Council.
- 2.3 The Queenstown Lakes District Council in principle supports the proposed change to "Amend the Conservation Act 1987 and National Parks Act 1980 to introduce a new streamlined process for partially reviewing planning documents where public interest is limited".
- 2.4 It requests clarification on how "directly affected persons and groups" would be defined if this goes forward. The affected persons or groups may not be an easily defined affected person or group depending on criteria and could include for example all cycle trail users or 'the film industry'. Queenstown Lakes District Council recommends that consultation options remain open to individuals, groups, organisations or those otherwise affected.

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<sup>1</sup> <https://www.qldc.govt.nz/community/population-and-demand>

<sup>2</sup> <https://www.mbie.govt.nz/dmsdocument/19854-2021-evaluation-of-nga-haerenga-great-rides-of-new-zealand-pdf>

<sup>3</sup> <https://www.qldc.govt.nz/media/wphl0l3l/queenstown-trails-strategy-2015-2025.pdf>

### **3.0 Concessions**

- 3.1 Queenstown Lakes District Council generally supports proposed changes that will streamline and modernise processes and increase Department of Conservation staff capacity to enable faster processing times for concessions.
- 3.2 Film Queenstown Lakes in principle supports providing the Minister of Conservation with the ability to make regulations that generally authorise specific activities, removing the need for a concession to introduce general authorisations. Having certain activities able to be covered by a general authorisation or an automatically approved concession may be beneficial as current concession frameworks can be unnecessarily cumbersome, restrictive, and/or expensive.
- 3.3 The criteria for automatically approved activities should be outlined and informed by impacted industries. An example is given in the discussion document whereby one person with one camera could potentially be addressed by a general authorisation. This could extend to light, low-impact drone usage. The Queenstown Lakes District Council recommends that when these details are confirmed that they are made publicly available.
- 3.4 Queenstown Lakes District Council recommends that a process managing activities with automatic approval be clearly outlined and any risks of overuse be mitigated through monitoring and reporting.

### **4.0 Minor and Technical Amendments**

- 4.1 The Queenstown Lakes District Council supports streamlining and clarity of requirements and legislation, however, cautions against the introduction of new or increased unnecessary restrictions at this time.
- 4.2 Queenstown Lakes District Council would like to see clear distinctions made between traditional aircraft concession requirements and UAV/drone concession requirements and for this to be reflected in legislative frameworks.
- 4.3 Queenstown Lakes District Council is supportive of the definition of public notification changing from print newspapers alone to a more equitable, widespread, and accessible form.
- 4.4 The discussion document makes note of improved information management within the Department of Conservation. Data collection and reporting is an important function of film offices and local government, both of which are often asked to report on activity in the region (including activity on Department of Conservation land). This has proven challenging on occasion in the past.
- 4.5 Queenstown Lakes District Council strongly supports improvements to Department of Conservation data systems and would be interested in learning more about proposed improvements.