

28 February 2025

Via email: accesschargingconsultation@doc.govt.nz and landlegislation@doc.govt.nz

SUBMISSION TO DEPARTMENT OF CONSERVATION ON EXPLORING CHARGING FOR ACCESS TO SOME PUBLIC CONSERVATION LAND AND MODERNISING CONSERVATION LAND MANAGEMENT

Thank you for the opportunity to present this submission. The Queenstown Lakes District Council (QLDC) is supportive of work on charging for access to some public conservation land and modernising conservation land management.

QLDC's interest in the Department of Conservation's (DOC) proposals is ensuring that conservation and biodiversity outcomes are protected and enhanced, people are able to access and enjoy the public conservation estate, the conservation management system is simpler and more responsive, and concession holders have clear and consistent frameworks that provide planning certainty and support good operators.

In relation to **charging for access to five conservation sites**, QLDC agrees that it is time for the country to consider introducing charges that will contribute to some of DOC's large funding gap. With the shift to regenerative tourism, it is appropriate to ask international visitors to contribute an appropriate amount to the conservation sites they visit through user charges. QLDC views that the majority of revenue generated from user charges should be allocated to the region in which revenue is raised, with the remainder for high priority conservation work that requires funding.

In relation to **reforming the conservation management system**, QLDC is supportive of changes that will make the system more responsive, efficient, and easier to engage with, while still prioritising positive conservation and biodiversity outcomes. The development of a National Conservation Policy Statement and a single layer of area plans will create consistency and simplify the system, but there should continue to be a strong role for the NZ Conservation Authority and iwi. For proposals that relate to how the system works with concession holders, there need to be clear, transparent and fair frameworks that support responsible concession holders to continue to do good work. QLDC does not consider that the conservation system or the country will benefit from enabling disposal of a wider range of public conservation land.

Thank you again for the opportunity to comment.

Yours sincerely,



Michelle Morss
General Manager – Strategy & Policy

SUBMISSIONS TO THE DEPARTMENT OF CONSERVATION

1.0 Context of access charging for some public conservation land and modernising the conservation management system in the Queenstown-Lakes District

- 1.1 Aotearoa New Zealand's natural environment is a taonga. People are drawn to New Zealand and to the Queenstown-Lakes district (QLD or the district) to live, visit and recreate because of its spectacular wilderness and alpine environments. These environments include extensive areas of public conservation estate and land subject to QEII trust covenants, such as the Motatapu Valley. The natural ecosystems and biodiversity that surrounds the QLD are critical both to the community's wellbeing and to the visitor economy.
- 1.2 The QLD community is actively involved in efforts to protect and enhance the district's natural environments – whether it is clearing wilding species, revegetating with native species, controlling pests and predators, or protecting native fauna. The community encapsulated their vision for the district's natural environment as having a deafening dawn chorus, and a place where ecosystems flourish¹. These outcomes are now part of QLDC's strategic framework².
- 1.3 Protecting and enhancing the natural environment is a strong focus for QLDC through its Climate and Biodiversity Plan³. Healthy ecosystems support rich biodiversity, protect people from the impacts of climate change and capture carbon from the atmosphere. Actions in the plan include integrating native regeneration and carbon removal and increasing the impact of local conservation organisations.
- 1.4 Alongside its importance to the community, public conservation land is crucial to the visitor experience in the district - it is what draws many people here. The high level of tourism in the district forms a key part of the local and national economy. Tourism accounted for 39% of GDP and 52% of all employment in the district in 2020. Pre-COVID-19, visitors who came to New Zealand because of Queenstown spent a total of \$1.44 to \$1.74 billion per annum nationally. This spending contributes \$1.3 to \$1.6 billion to Aotearoa New Zealand's overall GDP and 13,700–17,000 jobs nationally. The district contributed over 8.4% of the total tourism GDP in the year ending March 2023, making it disproportionately important to the national tourism economy compared to other destinations across the motu.⁴
- 1.5 To balance the benefits of tourism with the impacts, there has been a focus on regenerative tourism. QLDC, Lake Wānaka Tourism and Destination Queenstown developed a Regenerative Tourism Plan for the region, with input from Kāi Tahu and the Department of Conservation⁵ as key actors in the tourism system. The strong working relationship between these networked groups is founded on their shared objective to be a leader in regenerative tourism and destination management.
- 1.6 For these reasons, the consultations from DOC on access charging and streamlining concessions are of high interest to QLDC. This submission responds to both consultations and has been submitted to both. Part One of this submission relates to access charging and Part Two relates to streamlining concessions.

¹ [Vision Beyond 2050](#)

² [QLDC Strategic Framework](#)

³ [Queenstown-Lakes Climate and Biodiversity Plan 2022-2025](#)

⁴ <https://www.infometrics.co.nz>

⁵ [Travel to a Thriving Future: Queenstown Lakes' Regenerative Tourism Plan](#)

PART ONE: QLDC SUBMISSION ON EXPLORING CHARGING FOR ACCESS TO SOME PUBLIC CONSERVATION LAND

2.0 QLDC considers there is good justification for charging for access to specific public conservation land

- 2.1 Around a third of Aotearoa New Zealand is public conservation land. QLDC is sympathetic to DOC's situation where the quantum of the challenge to protect and maintain this public conservation land far outweighs the taxpayer funding allocated and the funding capacity of existing models. The available funding does not match what is required to ensure that public conservation land can continue to deliver the estimated net \$10.9 billion in value each year to New Zealand⁶. It is clear that DOC needs additional funds to protect and maintain conservation land and to continue the level of ecosystem services it provides.
- 2.2 Access charging is a logical way to contribute to DOC's funding gap, but is likely not the only solution. As DOC has outlined, many countries around the world charge for access to some conservation land such as national parks. It is reasonable that DOC introduces an aspect of 'user pays' through compulsory access charges (Option C) in certain areas, and that the charge is applied to day users and not just hut users.
- 2.3 Introducing an aspect of user pays to access specific public conservation sites is consistent with the QLD's shift towards regenerative tourism through its Destination Management Plan. Visitors are encouraged to contribute to the restoration and enhancement of the environment, community, and cultural heritage they experience. The Destination Management Plan's vision is for tourism to give back more than it takes, ensuring long-term benefits for both residents and visitors. A user-pays model for accessing specific public conservation sites aligns with this by generating funding for conservation efforts, infrastructure maintenance, and initiatives that protect the region's natural and cultural assets.
- 2.4 The objectives for designing access charges are important. QLDC agrees with the stated objectives but considers that protection of conservation and biodiversity values needs to be an overarching objective. Ideally, user charging would be underpinned by a fees and investment framework aimed at meeting current demands while allowing the space to address future strategic and operational needs and opportunities for the conservation estate.

3.0 Equity for New Zealanders should be the first criteria in deciding who pays for what

Access charges should not stop New Zealanders from accessing the outdoors

- 3.1 New Zealanders have a strong outdoor tradition and connection to the whenua, meaning that access to conservation land is considered by many as an important part of their culture, wellbeing and heritage. It is important that 'user pays' charges do not break the critical connection that New Zealanders have with their natural heritage and does not impede the ability to access the outdoors. A price cannot be put on the value of New Zealanders accessing public conservation land, connecting with their heritage and developing an appreciation for protecting and enhancing our natural environments. For that reason, it is QLDC's preference that user charges are not applied to domestic visitors to any part of the conservation estate at this stage..

A shift to regenerative tourism means it is appropriate for international visitors to contribute to the conservation sites they visit

- 3.2 Conservation land is critical to Aotearoa New Zealand's image and a major drawcard for domestic and international tourists. QLDC notes that DOC is only considering charging for access in five areas where a case can clearly be made to charge and where demand needs to be managed. One of the proposed criteria for identifying suitable sites is a high proportion of international visitation.

⁶ [The value of public conservation land – an ecosystem services assessment 2024](#)

- 3.3 QLDC considers it is appropriate to introduce an access charge for International visitors to specific sites, in line with a regenerative tourism approach. However, international visitors are increasingly facing charges to visit New Zealand and for conservation. There have been recent increases in visa fees, an increase in the International Visitor Levy, there is differential pricing for international visitors on the Great Walks, visitors on guided trips on conservation land pay an access charge through their concessionaire, and there are proposals to enable greater use of road charges across the country. A small number of concessionaires also charge for public access to conservation sites, such as the Remarkables ski field access road. QLDC recommends that user charges are not set until there has been careful assessment of international visitor ability to pay, considering New Zealand is already an expensive destination. However, it is equally as important not to undersell or underestimate how much visitors will spend to access the proposed sites.
- 3.4 DOC has proposed setting clear criteria to identify sites suitable for access charges. If the preferred option is to only apply compulsory user charges to international visitors, there may be additional sites DOC could consider that meet the criteria, given the quantum of the financial shortfall.

The majority of revenue from access charging should be allocated to the region where it was collected

- 3.5 Three of the five sites identified as being suitable for access charging are in the South Island. QLDC recommends that direct costs incurred from implementing access charging should be funded by revenue from the area in which it was raised and to maintain a quality experience. However, there is also an urgent need for more funding for conservation areas where access charging is unlikely to be feasible. For this reason, QLDC supports Option B where the majority of revenue is spent in the region in which it is generated, but some revenue can be allocated to priority conservation and biodiversity work in non-charging areas. Ring-fencing of the majority of revenue for the region in which it was raised is needed as charging may increase expectations on the standard of facilities available, as well as introducing implementation, monitoring and enforcement costs.
- 3.6 Consideration could also be given to ways that access charging could be used to achieve other objectives. For example, in some sites the use of flexible pricing models, such as 'flexi-pricing,' could encourage visitation during shoulder seasons, helping to alleviate pressure during peak periods and supporting more sustainable levels of tourism throughout the year. Operators manage capacity off-peak and use this period for routine maintenance but may be able to open up further capacity if demand was managed in such a way.

Recommendations:

- R.1. Add an objective for protection of conservation and biodiversity values.
- R.2. Introduce compulsory access charges for international visitors to specific public conservation sites.
- R.3. Ensure that access remains free for New Zealanders and respects the unique connection they have with the outdoors and whenua.
- R4. Fully understand the price sensitivity of international visitors to increased charges.
- R.5. Consider increasing the number of chargeable sites for international visitors to meet the financial shortfall.
- R.6. The majority of revenue raised through compulsory access charges should be allocated to the region where it was raised, with the remainder for high priority work in the wider conservation estate.
- R.7. Consider the use of flexi-pricing to encourage more even demand across the seasons.

PART TWO: SUBMISSION ON MODERNISING CONSERVATION LAND MANAGEMENT

4.0 The overriding priority for conservation land management must continue to be conservation

- 4.1 In reforming the conservation management planning system, it is important that the overriding priority is protecting and enhancing conservation and biodiversity. The impact on conservation outcomes needs to be at the fore across all the proposed reforms. Strong conservation outcomes will be the enabler for good recreation and economic outcomes. This could be supported by setting clear purposes and priorities for decision-making.
- 4.2 Alongside conservation, QLDC's interest in the concession streamlining process is from a community perspective. There are many local concession holders in the district and much of the tourism industry relies on some level of access to public conservation land. Public conservation land in the district is also host to regionally and nationally significant assets such as hiking and cycle trails.
- 4.3 QLDC has a commitment to support commercial industries in the district that align with QLDC's Economic Development strategy, which is comprised of the Economic Diversification Plan (EDP)⁷ and Destination Management Plan (DMP)⁸. One of these industries is the screen industry, which are commercial users of conservation land for location filming purposes.
- 4.4 Lastly, QLDC also has an interest as land administrators. Land managed by QLDC is often a gateway to public conservation land in the district and it makes sense that processes and requirements are aligned as much as possible. Within the QLD, 97% of the district is classified as either an Outstanding Natural Landscape or Outstanding Natural Feature and public conservation land sits within these areas.

5.0 A streamlined conservation management system that is simpler and faster is welcomed

- 5.1 Reform of the conservation management system that make the system simpler and faster are welcome. The system is overdue for change and needs to be timely and responsive so it can support good conservation outcomes. QLDC also supports making it easier for tourism operators and other valuable commercial users like the screen industry that are doing responsible, good work to continue to do so.
- 5.2 QLDC supports development of a National Conservation Policy Statement (NCPS) that creates consistency across jurisdictions, including some standardisation of terms and conditions, term lengths and regulated concession fees, a class approach to concessions, and a template for area plans. For concessionaires who work across jurisdictions, the current lack of consistency creates inefficiency and a greater level of standardisation through an NCPS and a single layer of area plans would be helpful. However, area plans will need to retain some level of flexibility to reflect the local context and protect conservation outcomes that make an area desirable to visit. QLDC also considers that the NCPS should incorporate climate change mitigation and adaptation and recognise DOC's Climate Change Adaptation Action Plan⁹.
- 5.3 QLDC does have concerns with the proposal that the NCPS is drafted at the same time as the potential Bill with public input at the Committee phase. This reduces the opportunity for public input into an important conservation document and QLDC considers that prior public consultation on policy options for the NCPS is desirable.
- 5.4 In relation to the process for making planning documents, the proposal gives less of a role to the NZ Conservation Authority than they currently have and a greater role to the Minister of Conservation and

⁷ [New pathways to a thriving future](#)

⁸ [Travel to a Thriving Future: Queenstown Lakes' Regenerative Tourism Plan](#)

⁹ [DOC's climate change adaptation action plan](#)

Director-General of Conservation. As an independent statutory body designed to protect conservation outcomes, the NZ Conservation Authority, and Conservation Boards, have an important role in the plan making process. QLDC recommends adding a step that seeks their input on the plan before it is sent to the Minister. Iwi also need a greater role in developing area plans, potentially through the same mechanism.

- 5.5 Proposals to simplify and speed up the concession approvals, including for those who operate across multiple jurisdictions, are supported. Having one set of rules to work towards will streamline concession approvals across jurisdictions, as will the ability to triage concessions, use a class approach to exemptions and prohibited activities, and to decline non-complying applications.

6.0 Better performance and outcomes from concessions needs to be underpinned by clear and consistent frameworks

- 6.1 QLDC supports competitive allocation of concessions in principle, recognising the potential to enhance conservation outcomes and visitor experiences. However, uncertainty around concession tenures or the competitive allocation process could deter long-term investment, delaying necessary infrastructure and service improvements. A clear framework is needed to provide certainty for operators while ensuring smooth transitions where concessions change hands. Competitive processes should align with regional tourism and economic goals, fairly value private assets on public conservation land, and acknowledge the strong track record of existing operators as a key criteria.
- 6.2 QLDC acknowledges the need for a fair and consistent approach to concession fees but has concerns about shifting from market-based pricing to a 'fair return to the Crown' model. Predictability in fee structures is critical to ensuring long-term investment in visitor infrastructure and services, and any changes must not create uncertainty that deters such investment. Concession fees should be set transparently, with clear benchmarks and regular consultation with stakeholders. Additionally, consideration should be given to ensuring that fee structures do not disproportionately impact small or community-based operators.
- 6.3 Clearer criteria for granting leases of more than 30 years would be particularly useful, recognising the importance of long-term investment in tourism infrastructure on public conservation land. Local ski fields, for example, operate on conservation land but require substantial capital investment in infrastructure, such as lifts, lodges, grooming and snowmaking equipment, to ensure a world-class visitor experience. QLDC believes that longer lease terms should be available where they align with the region's tourism objectives, ensure adequate returns on capital investment, and support sustainable infrastructure development. It is essential that any criteria introduced for longer leases are transparent, fair, and designed to support innovation and investment in high-value assets that contribute to the region's economy while also meeting conservation and community objectives.
- 6.4 In instances where a concession changes hands, QLDC supports a fair and transparent approach to valuing fixed assets on public conservation land. Local operators make significant infrastructure investments, and valuation methods must account for both physical assets and business goodwill. A clear, consistent framework is needed to provide investment certainty and ensure operators are not disadvantaged during transitions, encouraging long-term commitment to high-quality visitor experiences.

7.0 Enabling more flexibility for land exchanges and disposals needs to have a very high threshold to avoid a gradual loss of the public conservation estate

- 7.1 The proposal to broaden the ability for land exchanges and disposals beyond stewardship land needs to be treated with a very high level of care and robust checks and balances.
- 7.2 In principle, QLDC is opposed to disposal of surplus conservation land even if it is deemed as having no or very low conservation value. QLDC views that low-value conservation land still has value as public land. The risk in enabling disposals is that the one-third of Aotearoa that has been protected as public conservation

land for the public good will be slowly eroded, and that as a nation one of the things that makes the country appealing to so many, and that is critical for the totality of ecosystem services it provides, is lost.

- 7.3 Similarly, broadening the ability for exchanges of public conservation land needs to be treated with caution. A robust test should be in place that demonstrates significant net conservation benefit, with mandatory public consultation. Greater clarification is needed on how land would be determined to be suitable for exchange.
- 7.4 There are a number of other changes being made or proposed by the Government which are likely to impact on outcomes for public conservation land, including the Fast-Track legislation, proposals to allow mining on conservation land, and proposals for partnering to plant on Crown land. QLDC recommends the implications of these are considered when designing policy around land exchange and disposal, to ensure that conservation land is not under threat from multiple directions.

Recommendations:

- R.1. Reform of the conservation system to make it simpler and faster to engage with is supported, while ensuring the prioritisation of good conservation and biodiversity outcomes.
- R.2. A greater level of consistency through a National Conservation Policy Statement and a single layer of area plans is supported, including some ability for flexibility in local area plans to reflect local context if needed.
- R.3. Ensure the NZ Conservation Authority and iwi can contribute their expertise to the area plan making process.
- R.4. Competitive allocation of concessions is supported but only if certainty is provided for operators around the process and concession tenures.
- R.5. Market-based pricing is the preferred option because of the predictability it gives to operators, enabling them to plan and invest in services and infrastructure.
- R.6. Provide clear and fair criteria for granting leases of more than 30 years.
- R.7. Provide clear and fair criteria for valuing assets and goodwill when concessions change hands.
- R.8. Do not extend the ability to dispose of stewardship land to all conservation land, and place robust checks and balances on land swaps to ensure significant conservation benefits.