

Submission form

Submitting on Modernising conservation land management

This is the submission template for responding to the discussion document Modernising conservation land management.

The Department of Conservation (DOC) seeks your comments by 5 pm on Friday 28 February 2025.

Please make your submission as follows:

1. Fill out your details under the "Your name and organisation" heading and, if applicable, check the boxes underneath on privacy and confidentiality.
2. Fill out your responses to the discussion document questions. Your submission may respond to any or all of the questions. Where possible, please provide relevant facts, figures, data, examples and documents to support your views.
3. All submissions are subject to the Official Information Act 1982 and can be released, if requested, under that Act. If you have specific reasons for wanting parts, or all, of your submission withheld, please note these on page 2. DOC will consider them when making any assessment about the release of submissions. Please refer to DOC's privacy statement for further information.
4. Submit your comments by:
 - a. emailing your submission as a Microsoft Word document or searchable PDF to landlegislation@doc.govt.nz
 - b. mailing your submission to us at:

Department of Conservation
18 - 32 Manners Street
PO Box 10420, Wellington 6143
Attention: Modernising land management consultation submissions

Please direct any questions that you have in relation to the submissions process to landlegislation@doc.govt.nz.



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Submission on Modernising conservation land management

Name	
Organisation (if applicable)	
Contact details	

Release of information

Please let us know if you would like any part of your submission to be kept confidential.

I would like to be contacted before the release or use of my submission in the summary of submissions that will be published by DOC after the consultation.

I would like my submission (or identified parts of my submission) to be kept confidential, and have stated below my reasons and grounds under the Official Information Act that I believe apply, for consideration by DOC.

I would like my submission (or identified parts of my submission) to be kept confidential because [Insert text]

[To check the boxes above: Double click on box, then select 'checked']

Responses to questions

[To check the boxes below: Double click on box, then select 'checked']

Issues	
1.	<p>Do you agree with the issues?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p>
2.	<p>Have any issues been missed?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No comment</p> <p>If yes, please add any additional comments below.</p>
3.	<p>Do you have any examples or data that demonstrate your view on the issues?</p>
4.	<p>As you read the proposals in this document:</p> <p>a. Do you think any measures are needed to ensure conservation outcomes, whether in addition to or alongside the proposals?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No comment</p> <p>b. Do the proposals allow the Government to strike the right balance between achieving conservation outcomes and other outcomes?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p>

Streamlining the conservation management system

5.	<p>Simplifying the management structure</p> <p>a. Do you agree with the issues and how they have been presented?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p> <hr/> <p>b. Do you agree with the proposed changes to simplify the management planning framework?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p> <p>c. How could this proposal be improved?</p> <hr/>
6.	<p>Enabling class approaches to concessions</p> <p>a. Do you agree with the proposal to introduce classes of exempt activities, prohibited activities and permitting activities in advance through the National Conservation Policy Statement and area plans?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p> <p>b. How could this proposal be improved?</p> <hr/> <p>c. What types of activities are best suited to taking a class approach, and which activities would a class approach not be appropriate for?</p> <hr/>
7.	<p>Proposed process for making statutory planning documents</p> <p>a. Do you agree with the proposed processes for making, reviewing and updating the National Conservation Policy Statement?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p> <p>b. Do you agree with the proposed processes for making, reviewing and updating area plans?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p>

Strongly disagree Unsure

c. How do you think these processes could be improved?

8.

Giving effect to Treaty principles when making statutory planning documents

a. Do you think the proposals are appropriate to give effect to the principles of te Tiriti o Waitangi / the Treaty of Waitangi?

Strongly agree Agree Neutral Disagree

Strongly disagree Unsure

b. What else should the Government consider to uphold existing Treaty settlement redress?

Speeding up concession processing

9.	<p>Improving the triage of applications</p> <p>a. Do you agree with the issues in concessions processing and how they are presented?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p> <hr/> <p>b. Do you agree with how the Government proposes to improve triaging of concession applications?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p> <p>c. How can this proposal be improved?</p> <hr/> <p>d. What should DOC consider when assessing whether an applicant may not have the financial means to execute a concession?</p> <hr/>
10.	<p>Clarifying <u>Treaty partner</u> engagement requirements</p> <p>How can the Government best enable Treaty partner views on concession applications (e.g. whether Iwi/Hapū are engaged on all or some applications)?</p> <hr/>
11.	<p>Creating statutory timeframes for some steps</p> <p>Do you agree that additional statutory timeframes should be introduced, including for applicants (to provide further information) and Treaty partners?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p>

12.	<p>Amending when public notification must happen</p> <p>a. Would it be more beneficial if DOC notified only eligible applications where the intention is to grant a concession?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No comment</p> <p>b. Do you think any other changes to public notification should be considered?</p>
13.	<p>Clarifying the reconsideration process</p> <p>a. Do you agree with setting timeframes and limits on reconsiderations?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p> <p>b. How can this proposal be improved?</p>

Driving better performance and outcomes from concessions

14.	<p>Enabling competitive allocation of concession opportunities</p> <p>a. Do you agree with the issues and how they have been presented?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p>
	<p>b. Do you agree with the proposed criteria to guide <u>when</u> concession opportunities are competitively allocated?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p>
	<p>c. How can the proposed criteria be improved for <u>when</u> an opportunity should be competitively allocated?</p>
	<p>d. Are there any situations in which competitive allocation should not occur, even if the criteria are satisfied?</p>
	<p>e. Do you agree with the proposed criteria to guide <u>how</u> concession opportunities are allocated?</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree</p> <p><input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure</p>
	<p>f. How can the proposed criteria be improved for <u>how</u> allocation decisions should be made?</p>
	<p>g. What are your views on a ensuring a fair valuation of assets when transferring a concession?</p>
	<p>h. How can the interests of existing operators and potential new operators both be fairly met in exclusive commercial opportunities?</p>

15.

Modernising contractual management of concessions

a. Do you agree that the proposed National Conservation Policy Statement could guide things like standardised terms and conditions, term lengths, and regulated concession fees?

Strongly agree Agree Neutral Disagree

Strongly disagree Unsure

b. What are your views on setting standard terms and conditions for concessions?

c. What circumstances and activities might justify longer or shorter term lengths?

d. What are your views on setting activity fees based on a fair return to the Crown rather than market value?

e. What are your views on setting standardised, regulated fees?

f. What are your views on changing the frequency of activity fee reviews?



Unlocking amenities areas to protect nature and enhance tourism

16.	Do you agree with the issues relating to amenities areas and how they have been presented? <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure
17.	Do you agree with the proposal to create a single amenities area tool? <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree <input type="checkbox"/> Unsure
18.	How can this proposal be improved?
19.	What should the main tests be to determine if an amenities area is appropriate?

Enabling more flexibility for land exchanges and disposals

20. Land exchanges

a. Do you agree with the issues and how they have been presented?

Strongly agree Agree Neutral Disagree

Strongly disagree Unsure

b. Do you agree with the proposal to enable more flexibility for exchanges where it makes sense for conservation?

Yes No Unsure No comment

c. How could this proposal be improved?

d. What should be included in the criteria for a net conservation benefit test for exchanges of public conservation land?

e. Are there criteria that should not be considered in a net conservation benefit test for disposal of public conservation land?

f. Should a net conservation benefit test for exchanges of public conservation land include meeting Iwi aspirations (for example, returning sites of significance to Iwi/Hapū)?

Yes No Unsure No comment

21.

Land disposals

a. Do you agree with the issues and how they have been presented?

Strongly agree Agree Neutral Disagree

Strongly disagree Unsure

b. How could this proposal be improved?

c. Do you agree with the proposal to enable more flexibility for disposals where it makes sense for conservation?

Yes No Unsure No comment

d. When should the Crown have the ability to dispose of public conservation land and for what reason(s)?

e. What should be included in the criteria for a net conservation benefit test for disposals of public conservation land?

f. Are there criteria that should not be considered in a net conservation benefit test for disposal of public conservation land?

g. Should a net conservation benefit test for disposals of public conservation land include meeting Iwi aspirations (for example, returning sites of significance to Iwi/Hapū)?

Yes No Unsure No comment

