

## Abel Tasman Foreshore Scenic Reserve Management Plan

### Comments from NZCA

Comment no.	Plan reference	Comment	Suggested text changes
1.	P10 para 3	Extent of FSR not described until p 39	Include a verbal description as per p 39 together with map to define SR at outset
2.	P11 Vision Objective 1	Note there is no legislative mandate for a vision	To note that vision is non-statutory
3.	P11 Objective 6	Uncertain as to the intent of this objective. It is not discussed or explained in the text. Historical associations are covered in objective 5 and indigenous culture in objective 7	Delete objective 6
4.	P14 1.2.1 2 <sup>nd</sup> para 2 <sup>nd</sup> sentence	word missing "department"?	Insert missing text
5.	P 17 2.2.2 and Policy 5 p18.	Text is confusing, especially 2 <sup>nd</sup> sentence "commercial customary". Wasn't commercial customary fishing extinguished by section 9 of the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 ("Sealords Act")? There is no reference to recreational fishing.	Clarify text re customary, recreational and commercial fishing. Clarify policy regarding eeling and whitebait fishing, using cross references if necessary. It would be helpful to put footnote 3 into the methods.
6.	P21 2 <sup>nd</sup> to last line	What is the 'one' zone?	Clarify
7.	P28 3.3 Fire	Methods 2 and 3 do not explain what fires may be "necessary" for management. This does not conform with CGP or the ABNP MP.	Specify situations (justify) when fire would be necessary for management or delete.
8.	P30 last para 1 <sup>st</sup> sentence and 3.4 Method 3 p31	Phrase "advocate for sensitive development' could be interpreted as advocating for development.	Reword to avoid ambiguity " Advocate that any activities or development should be sensitive to the environment and appropriate for the location" or similar.
9.	P30 3.4 Policy 2	Should this policy be stronger? Relate more specifically to purpose of the reserve.	After the word landscape add 'or scenic"
10.	P 30 3.4 Method 2	This refers to 7.2 but 7.2 gives no guidance on facility development apart from minimising structures. If there are to be structures, there should be guidance on extent, materials, design etc.	Provide more guidance/criteria for decision making for new structures or facilities cf CGP Policy 10(e) (v), albeit those criteria relate only to accommodation and related services.

11.	P36 4.2. Policy 2 and p37 Methods 2 and 3	Phrase 'where appropriate' is unclear and gives no guidance.	Delete phrase 'where appropriate' and include criteria
12.	P38 Method 2	Very broad statement; a rock in the sand could be a hazard to some people.	Tighten the criteria to reflect CGP policy 8(e) i.e. in circumstances of imminent danger that cannot be avoided by other means
13.	P39 grey box, para 4, final sentence	Strongly support the need for integrated management for the whole coastline.	Retain integrated approach
14.	P39-41 s6.1	The SR is a legal and managerial distinction in land tenure that is meaningless to most visitors - to most people, the SR is the NP. Fundamental to successful management of the SR is integration with the NP, allowing for exceptions or more liberal policy for the small and discrete areas of the SR that border private land.  While this point is partly addressed in para 1, s6.1.1 – the comment is limited to access/use	Insert a statement that expresses this – e.g.  Management of the SR is critical to the successful management of ATNP. With appropriate consideration being given to areas of SR adjacent to private land, the SR should be managed so as to mirror policies of the ATNPMP.
15.	P40 6.1, para 3	Last sentence is not consistent with legislation	Reword to the effect that the AT Coastal track and reserve are among the most popular visitor destinations in NZ and are a national priority for management.
16.	P40 para 5	Reference to DOC SOI – business planning instrument; not appropriate to refer to in statutory plan. While currently states long term direction of DOC nationally, it could change within the life of this 10 year plan. If there is a statement therein that is critical to this plan then it should be included in the plan itself. Further, it seems in appropriate to refer to the business planning document of one of the two joint parties to the plan and not the other.	Delete reference to DOC SOI
17.	P41 Local context	For reasons of clarity and completeness, it would be useful to have these reserves identified on a map.	Identify TDC local reserves adjoining the scenic reserve on existing or new maps
18.	P42 1 <sup>st</sup> complete para	As bonfires are to be phased out, pp27-8, suggest the reference to enjoying bonfires be omitted.	Delete "and enjoying bonfires"
19.	P42 6.1.2, (d) at bottom of pg	Support the commercial-free intent for the reserve	Strongly support 6.1.2 (d) and method 8.2 (2)(b)

20.	P43-45 6.1.3	Support approach taken – use of recreational zones and access points. Zones & access points seem appropriate Support intentions expressed in this section – that need to control visitor numbers/use and commercial activities consistent with ATNPMP	Retain this approach  Retain this approach
21.	P44 Map 2	Suggest x-references to subsequent ‘blow up’ maps	Insert text boxes to x-reference maps
22.	Maps 2A-F	It is noted that the reserve boundary does not encompass area to MHWS – assume this is because there are esplanade reserves or accretion has occurred?	Include explanation for why reserve boundary does not encompass area to MHWS.
23.	P45 6.1.3.1 Coastal Access Points	Support the proposed coastal access points. Request that the coastal access points be restricted to those identified in the draft plan. The policies go into the detail of what can happen at the coastal access points but there is no umbrella policy restricting the number and location to those identified.	Retain method 6.1.2 p60 Request that there be a policy restricting the coastal access points to those identified in the draft plan.
24.	P53 (vii) – and elsewhere throughout MP	Not entirely confident that understand whether the term “visitor numbers managed to a maximum...” includes total visitors arriving by whatever means (including FIT on foot) and, if it does include FIT, how they will be “managed” so that the maximum number total visitors is not exceeded.	Insert after ‘visitor numbers’ (including all independent visitors) if this is the case Explain what management action will be taken to “manage” total visitor numbers within the maximum
25.	P53/54 grey box	Support <b>no</b> access point at Medlands Beach or Tonga Quarry. Key principle to is provide access for the full range of visitors to AT foreshore – believe suggested access points achieve this goal for users of commercial boats. Also need to provide places for non-commercial boat users. Both offer such a ‘low key’ beach and camp experience Point 4 - Support the integrity of the ATNPMP which involved extensive consultation with commercial interests.	Keep access points to those already listed – and not at Medlands Beach & Tonga Quarry for reason given.
26.	P56 (ii)	Private aircraft landing on reserve – see submission point 71.	
27.	P56 (iii) – and elsewhere throughout MP	“...no training or active team sports by these groups”	Define what this means
28.	P57 6.1.3.4 end of para	This potentially undermines the NPMP.	Delete “independently landing on the

		Isn't a charter boat a commercial operator? 8.2.4 para 1 p 77 says no charter boat activity on North Coast.	reserve from a charter boat". Clarify 6.1.3.4 (ii) p 57 as to the meaning of "direct". Allowing passengers of charter boats to swim or walk ashore without requiring a concession is an unwarranted loophole.
29.	P58 6.1.5 Noise	"An exception is made for communication devices used for operational or safety purposes". The nature and level of accepted use is not clear.	Clarify the use of communication devices.
30.	P60 Method 1	Vague and open-ended – the verb "consider" is the problem	Change "consider" (the active verb) to a stronger word, e.g. "As required to meet the outcomes/etc of this MP, temporarily or permanently close parts of the reserve."
31.	P60 Methods	There is no Method with regard to commercial use of the North Coast. While there are in concessions section, should there also be here?  Support maximum of 200 total visitors per site per day in North Coast zone	Add a Method that no commercial use of North Coast except as provided for in the NPMP.  Retain 6.1 (2)(d)
32.	P61 Method 5	"Ask the Department of Conservation to" seems superfluous in a DOC plan.	Delete "Ask the Department of Conservation to"
33.	P61 Method 6	Minor wording suggestion	"Monitor visitor experiences, satisfaction and effects in each Rec Zone..."
34.	P61 Method 7	Make the connection between camping on boats (by law 14) and requirement for holding tanks (by law 7 no discharge of human waste) more explicit. See also 7.1 end of 1 <sup>st</sup> para p66 – bylaws don't actually express this overtly.	Include method' To only allow camping in boats in the reserve where the vessel has an onboard toilet with containment facilities."
35.	P64 6.3.3. Aircraft Method 2	Support prohibition on float planes	Retain prohibition on float planes.
36.	P65 6.4.3 Domestic animals	As there is no fence between the reserve and the national park, domestic animals are not containable on the reserve. Permitting domestic animals on the reserve other than under control for the purposes of reaching	Insert into policy after 'reserve' "and national park"

		private land and being restrained therein therefore threatens national park values in addition to any on the reserve threatened by domestic animals.	Retain Methods 1 and 3. Add another Method "Advocate to non-resident adjoining private landowners that dogs not be brought on holiday with them or their guests".
37.	P69 – 70 Concessions Policy and Methods	Support the concessions policy and methods	Retain concessions policy and methods
38.	P71 3 <sup>rd</sup> full para	The activity types within the brackets do not include cruise ships	Add 'cruise ships' to the list of activity examples specified in brackets
39.	P71 , last sentence	Having charter boats act as water taxis at the same time is opposed.	Separate the activities of water taxis and charter boats to avoid blurring their respective activities.
40.	P71 para 5, line 2	Support reference to the adjoining NP. This is important	Support and retain text "Any commercial recreation activity carried out in the adjacent national park requires a separate concession to any that may be granted for activities on the reserve"
41.	P72 (ii)	With regard to term and allocation of rec concessions – (ii) helpful to have alignment between NP and SR mechanism – support 8.2 Method 3(a) p82	Retain Method 3(a) page 82 and insert the words to read as follows" with respect to visitor concession limits etc"
42.	P75 (ii) Private landowners – and elsewhere throughout MP P127 12.5.4 and 12.5.6	It would be helpful to know why there is a bach on unformed legal road (which is public land). We presume this would be covered by the policy to stop or resume unformed legal roads See 12.5.4 and 12.5.6 p127 ?	Suggest dog use at this site should be grandfathered 12.5.6 p127
43.	P76 2 <sup>nd</sup> para	"concessionaires should be required to record the number of private landowner.." This does not seem to be included in the methods.	Add a Method to give effect to this intent.
44.	P77 8.2.4 Charter boats	Charter boat provisions in the plan seem to have loopholes that allow access to places that are not access points, by allowing passengers to walk or swim ashore. This undermines the Place outcomes.	Remove exemptions for charter boats such as passengers going ashore independently.
45.	P77 8.2.4 Table 3	Clarify asterisk note - does this mean 100 trips per day? If so this is considered excessive. Unlike other activities, there are no limits on	Revisit the charter boat limits and include daily passenger limits.

		passenger numbers, therefore there is no control on the number of boats of a particular size using the reserve. See submission below on Appendix 9.	
46.	P78 8.2.8	The practicality of determining whether a kayak is hired or not seems unrealistic. The wording of 8.2.8 is appropriate except for the final paragraph suggesting a new bylaw to control access and limit use by these visitors. Has this had a legal check? It would seem that if these visitors were an issue, controls from TDC on use of surface water would be the necessary mechanism of control.	Amend the last paragraph of 8.2.8 to reflect realistic mechanisms that could be used to control/limit this type of visitor.
47.	P80 8.2.11	Support	Retain
48.	P80 8.2.14	Support	Retain
49.	P81 8.2.15	Visitors to the national park also do not expect or wish to see advertising from the park.	Add after 'the reserve' "or the national park"
50.	P81 8.2.17 (a)	Does "charity treks" mean horses? Question whether this is appropriate activity given the level of public use, policy to not allow domestic animals including horses, and biosecurity risks (weeds etc).	Clarify whether includes horse trekking and reconcile with previous statements about domestic animals including horses
51.	P81 8.2.17(a)	Oppose inclusion of Cruise ship groups for one-off concessions. Table 4 on page 79 sets maximum limits and Method 13(b) says Table 4 limits not to be exceeded. One-offs undermine these provisions.	Delete 'cruise ships groups' from 8.2.18(a)
52.	P82 8.2.18	Support monitoring	Retain
53.	P82 Method 2 (a) and Method 15 p 85 (Also text p71 last paragraph)	Guided jet skis at coastal access points – this is a step too far in terms of intensive usage at these sites. Method 15 refers to "operation of commercial vessels" but this differs widely, depending on the nature of the vessel.	Do not provide for commercial use of personal watercraft.
54.	P82 Method 2(d)	Clarify noise provisions	Delete "produces excessive noise" and reword "adds to the overall level of noise".
55.	P82 Method 3(a)	Support integration with national park management	Retain Method 3(a) page 82 and insert the words to read as follows" with respect to visitor concession limits etc"
56.	P83 6(a)	There should be no water-based commercial activity at the Awaroa	Delete Awaroa Vehicle Access Corridor.

		Vehicle Access Corridor. This is covered in 16 (b) p86. South Coast should be non-motorised only to be consistent with the NPMP.	Amend to read "non-motorised at the South Coast".
57.	P83 Method 8 (c) (iii)	The relationship between charter boats and water taxis, especially when one is both, is unclear and unenforceable.	Delete (c) (iii) Include passenger limits or limits on boat size
58.	P85 Method 14 Organised Sporting events	This does not seem consistent with the NPMP 5.3.2.1.11 (13) p137 which says that no new sporting events should be permitted. Allowing for additional events at peak times 14 (b) (vi) seems unwise.	Reassess allowing new events at peak times.
59.	P86 Advertising	Minor point - Isn't the issue signage? I guess they use Advertising because that is used in the NPMP.	
60.	P86 Method 18	(a), (c) and (e) are consistent with the NPMP (p 129) but (b) and (d) seem to undermine (a). We are not clear what sort of activity this is intended to provide for. Other activities should be using the services of existing concessionaires e.g. water taxis or charter boats, or would otherwise be independent, or otherwise be included under (a) and (c). (b) and (d) seem to be double-providing for commercial activity.	Delete (b) and (d).
61.	P92 9.1.1, para 2	"... adversely affect the intrinsic values of the reserve". DOC's Visitor Strategy makes it clear that commercial users should not adversely affect independent users of PCL (i.e. there is a clear hierarchy between commercial and independent visitors) and the CGP includes the same intent. This should be added to the above sentence	Expand sentence to read: "... adversely affect the intrinsic values of the reserve or other visitors".
62.	P101 Methods 4,11, 15 and 16	Should be prefaced by "Advocate that" as these are outside the Reserve.	Add 'Advocate that' at the beginning of Methods 4, 11, 15 and 16
63.	P101 Method 5	Support closure of unformed legal road	Retain
64.	P101 Methods 9 and 10 Waterskiing	Support	Retain
65.	P101 Method 11	Support	Retain
66.	P109 11.2 Outcome	The outcome should encompass pest and conservation issues more directly e.g. "Plant and animal species on the reserve are primarily indigenous, and	Broaden the outcome to encompass biosecurity and species conservation objectives.

		any exotic species are not a risk to the reserve. No new exotic species have established and native wildlife thrives."	
67.	P80 8.2.12, p 113 11.5.3 Land vehicles, p85 Method 15	Amphibious craft and hovercraft etc – why not simply restrict them to the coastal access points?	Restrict these craft to coastal access points
68.	P 80 8.2.13, P113 11.5.3 Land vehicles, p 86 Method 16 and P116 Methods	Would like to see use of vehicles limited to transportation of people and goods across the reserve to private land – not able to be used for recreational use	Add sentence that vehicles not to be used on the reserve for recreational purposes
69.	P117 Method 5	Is this consistent with 8.2 Methods 14 and 18?	Reconcile with and cross reference to 8.2 Methods 14 and 18
70.	P117 Policy1	Insert a date as this may change – suggest the current	Insert date of the Tasman RM Plan as it is this version of that Plan that was referenced at the time of this plan's notification.
71.	P122 Method 5	Why allow aircraft use of the SR? Why not limit it to the private land itself? It could be acceptable as one-offs e.g. where for logistical reasons helicopter was needed to fly in equipment or building materials. There is a private airstrip at Awaoroa. Otherwise water taxis can be taken from Marahau.	Restrict use of reserve for aircraft to essential servicing of adjoining land that cannot be provided for in any other practical manner.
72.	P123 12.2	Support the Outcome statement for the Foreshore Adjacent to the National Park. Suggest add after the third sentence " There is little evidence of non-native species."	Retain with amendment
73.	P125 12.4 Policy 1	Delete the word 'threatened' and replace with "indigenous".	Delete the word 'threatened' and replace with "indigenous".
74.	P126 12.5.3	Only two recreational zones are identified under the Recreational Zones heading. The North Coast zone is not described. The Outcome for the Place includes the words "in accordance with the Recreational Zones".	Insert a new sub-section for the North Coast zone and text identifying that the zone is managed for lower numbers and a more natural experience than the other zones consistent with page 97 of the Abel Tasman National Park Management Plan.



75.	P127 12.5.6(i)	Support that dogs must be on leashes	Retain
76.	P127 12.5.2(ii)	Request that this be grandfathered to the current owner i.e. not a right that attaches to ownership of the bach	Insert after bach 'at the time of this plan's approval'
77.	P128 Method 5	Dogs on the Foreshore adjacent to the bach on unformed legal road should also be on a leash – the wording is not unambiguous. Exemption should be grandfathered to current bach owner	Amend wording of Method to reflect comments
78.	P128 12.6 Para 2, final sent	Strongly support "Access to the reserve from the water should be on nature's terms" Does this statement need greater prominence – e.g. in a policy/method? Support no new structures	Insert after 'structures' "to those that already exist"
79.	P129 Method 12.6.2	This is in conflict with the introductory text and is unclear.	Delete Method.
80.	P130 South Coast (iii)	Confusing wording.	Reword as on p 131 (v)
81.	P131 South Coast (iv)	This activity is a grandfathered provision that should clearly limit this to the existing operator, as stated earlier in the plan.	Clarify that (iv) is limited to the existing operator.
82.	P131 South Coast Charter boat	This provision is inconsistent with the NPMP in that it allows motorised landing anywhere on the south coast. Motorised activity should be limited to the coastal access points.	Retain consistency with NPMP.
83.	P132 North Coast	Support no landings by commercial operators	Retain
84.	P145	Other publications. Incomplete list	Include Miskelly et al referred to later in the appendices p168
85.	P171 Appendix 9 Setting Water Taxi Activity Levels	This methodology lacks transparency or validity. A 6 month period is considered then divided by 4 for a monthly total. This is unacceptable – it should be divided by 6. A similar thing occurs when the daily rate divides the monthly figure by 20, when there are usually 30 days in a month. This methodology escalates the limits in an unjustified manner.	Revisit the limits by using a rational approach to working out daily limits using actual months and days.
86.	P172 Charter Boat Limits	Even greater obscurity has been applied to these limits. The justification for 50 trips a day (which is then doubled) is not provided.	Set more realistic and acceptable limits for charter boat activity, including limits on boat sizes/passenger numbers.