

2.3.2 Benefits and disadvantages of public participation

Public participation has many benefits (PWCNT 2002; IAP2 2006); some are shown in Table 1. The main aim of public participation is to encourage the public **to have meaningful** input into the decision-making process. Public participation thus provides the opportunity for communication between agencies making decisions and the public. This communication can be an early warning system for public concerns, a means through which accurate and timely information can be disseminated, and can contribute to sustainable decision-making (IAP2 2006). These benefits apply when public participation is a two-way process—where both the agency and the public can learn and gain benefit (PWCNT 2002; IAP2 2006). Effective public participation allows the public’s values to be identified and incorporated into decisions that ultimately affect them (Johnson 2001; PWCNT 2002; IAP2 2006).

While there are numerous advantages associated with public participation in planning and decision-making processes, there are also disadvantages (MfE 1999; PWCNT 2002). Public participation can be time-consuming and sometimes expensive. To do it effectively, organisations have to build capacity and train staff. If done poorly, public participation processes can result in, for example, loss of faith in the agency. A negative experience of the process may lead participants to have negative perceptions of the outcome, and they may be less likely to participate in future processes.

Figure 3. Public Participation Spectrum. Based on figure in IAP2 (2006: 35).

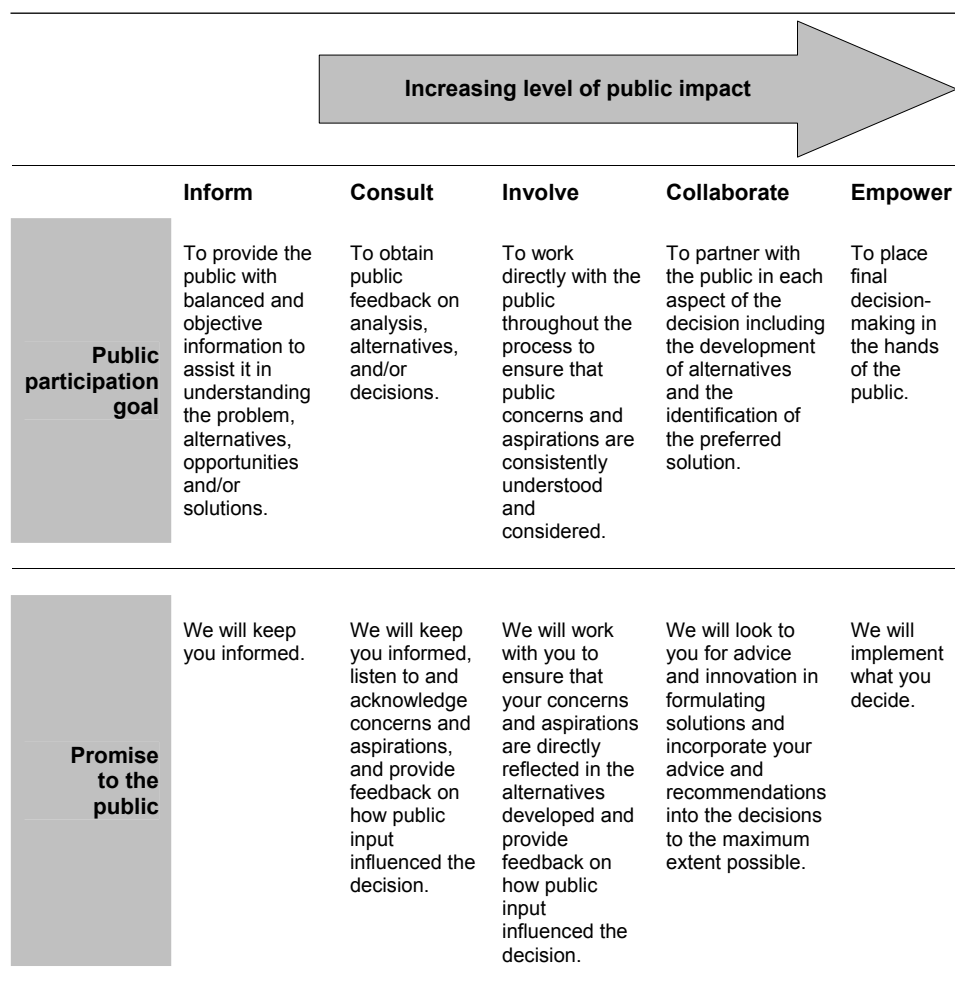


TABLE 1. BENEFITS OF PUBLIC PARTICIPATION, FROM CNPPAM (2002).

-
- Improved understanding of client expectations and user group needs
 - Improved agency understanding of conservation issues
 - Improved agency understanding of the role and contribution of the community
 - Greater continuity in knowledge
 - Ability to build community support for a project and to improve stakeholder relationships
 - Improved public understanding of the agency's responsibilities
 - Improved staff and community technical knowledge
 - Improved agency credibility within the community
 - Improved quality of decision-making by agencies
 - Enhancement of social capital and flow-on social and economic benefits
 - Enhanced and informed political process
 - Greater compliance through increased ownership of a solution
 - Greater community advocacy for biodiversity protection
 - Greater access to community skills and knowledge
 - Improved community understanding of conservation issues and responsibility for conservation outcomes
-

2.3.3 Principles for public participation

A number of authors have developed principles for public participation. This section briefly describes these, from the general principles for public participation (**should**) to the specific principles (**must**) relevant to consultation in New Zealand and in DOC.

The IAP2 (2006) produced a set of core principles for the practice of public participation. These principles are:

- The public should have a say in decisions about actions that could affect its members' lives
- Public participation includes the promise that the public's contribution will influence the decision
- Public participation promotes sustainable decisions by recognising and communicating the needs and interests of all participants, including decision-making agencies
- Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision
- Public participation seeks input from participants in designing how they participate
- Public participation provides participants with the information they need to participate in a meaningful way
- Public participation communicates to participants how their input affected the decision

Best practice principles for public participation in protected area management, as shown in Table 2, formed part of the Benchmarking and Best Practice Program for the Committee on National Parks and Protected Area Management in the Northern Territory, Australia (PWCNT 2002).

Ronmark (2005) developed a suite of principles for measuring the process, outcome, and implementation of management planning processes in British Columbia's parks and protected areas. Ronmark considered that successful consultation should be fair, efficient, and informative. Public participation

TABLE 2. PRINCIPLES OF BEST PRACTICE IN PUBLIC PARTICIPATION, FROM CNPPAM (2002).

-
- Public participation is an integral component of protected area management
 - Agency's seeking involvement of the public need to be open and clear about the extent of involvement intended in order to avoid creating false expectations
 - Public participation programmes should recognise the diversity of values and opinions that exist within and between communities
 - Good programme design is crucial to the success of public participation programmes
 - Specialised public participation techniques and training are required for programmes to succeed
 - The information content of public participation programmes should be comprehensive, balanced and accurate
 - A public participation programme should be tailored to suit the situation at hand
 - A public participation process requires adequate time and resources—successful outcomes may be undermined where these are lacking
 - Agency staff should be skilled in public participation design and processes
 - The community should be consulted about public participation design and process before the agency finalises its approach
 - To address the needs of specific groups, special participation techniques are required
 - Public participation programmes should aim to capture the full diversity of people within a community—not only people that are the most publicly active or socially capable
-

should occur at an early stage, all interested and affected people should be represented, and public input should be used in the development and evaluation of alternatives. Ronmark states that the process should involve shared decision-making. Stakeholders should be able to participate on an equal basis with administrative officials and technical experts.

Along similar lines to Ronmark (2005) above, Johnson (2001) considered principles for public involvement in environmental impact assessment (EIA) in New Zealand under the Resource Management Act 1991 (RMA). The key principles that this study considered to be imperative were:

- The public is involved early in the process
- The full spectrum of opinions and values is exposed
- Forums for participation are effective
- Issues of concern to the public are taken into account in reaching a decision
- The experience is positive.

The concept of consultation has also been interpreted in New Zealand case law. Of particular relevance is the 1991 Wellington International Airport Ltd v. Air NZ (Court of Appeal) case, which is significant in terms of consultation (MfE 1999; Quality Planning 2008). This case demonstrated that consultation is not merely telling or presenting, nor should it be a charade, nor is it the same as negotiation—although a result of consultation could be an agreement to negotiate. This case identified a number of elements of consultation that can be summarised as including the following principles (Quality Planning 2008):

- Consultation is the statement of a proposal not yet finally decided upon.
- Consultation includes listening to what others have to say and considering responses.
- Sufficient time must be allowed for the process and a genuine effort made
- The party obliged to consult must make available enough information for the consultee to be adequately informed and able to make intelligent and useful responses.

- The party obliged to consult must keep its mind open and be ready to change and even start afresh. However, the consulting party is entitled to have a working plan already in mind.
- Consultation is an intermediate situation involving meaningful discussion.
- The party obliged to consult holds meetings, provides relevant information and further information on request, and waits until those being consulted have had a say before making a decision.

The definition of consultation in DOC's general policies (Section 1.1) also provides a set of principles for best practice (DOC 2005; NZCA 2005). The principles include that DOC must:

- Provide sufficient information and time
- Enable ongoing dialogue
- Provide confidence that people's views are considered
- Provide an enabling process
- Invite people to participate

2.3.4 Evaluation criteria

Based on DOC's statutory obligations, findings from previous studies, and the principles described above, the following nine evaluation criteria have been developed to measure the effectiveness of public participation in DOC's statutory planning processes. The criteria are summarised in Table 3.

Criterion 1: Representation

The people that participate in a consultation process must comprise a broadly representative sample of the affected public. This means that all parties with an interest in the issues and outcomes of the process are involved throughout the process. A sound process ensures that the full spectrum of the opinions and values held by the public is exposed.

TABLE 3. SUMMARY OF EVALUATION CRITERIA.

CRITERION	DEFINITION
1. Representation	Public participation must comprise a broadly representative sample of the population of the affected public.
2. Influence	Issues of concern to the public, and relevant to the decision at hand, must be taken into account in reaching a decision.
3. Timeliness	Realistic milestones and deadlines must be managed throughout the process.
4. Purpose and decision-making	The participation process must be driven by a shared purpose, with the nature and scope of the participation task clearly defined.
5. Early involvement	The public must be involved early. This involvement extends onwards throughout the planning process.
6. Effective forums	The public must be able to participate in an effective forum. A variety of techniques is used to give and receive information, including face-to-face discussion between parties.
7. Information	Public participation provides participants with the information that they need to participate in a meaningful way.
8. Enabling process	The process for public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
9. Feedback	The public participation process communicates to participants how their input affected the decision.

Criterion 2: Influence

Issues of concern to the public, and relevant to the decision at hand, must be taken into account in reaching a decision. Public input is used in the development and evaluation of options and public contribution has a genuine impact on the decision. It is important to ensure that stakeholder and public participation is, as much as possible, on an equal basis with that of the administrative officials and technical experts (within legal constraints). Public input in DOC's statutory planning process cannot extend to decision-making owing to the restraints of the legislation (see Section 2.3.1 on spectrum).

Criterion 3: Timeliness

Realistic milestones and deadlines must be applied throughout the process, including allowing sufficient time for meaningful consultation with iwi.

Criterion 4: Purpose and decision-making

The participation process must be driven by a shared purpose, with the nature and scope of the participation task clearly defined. This includes ensuring that the process is transparent so that the public can see what is going on and how decisions are being made. Procedural ground rules and roles of the participants must be clearly defined. A right of appeal is not included as a principle as this is not possible under current legislation.

Criterion 5: Early involvement

The public must be involved early in the planning process and this involvement must continue throughout the whole process (i.e. in the development of the plan, and in consulting on the draft plan).

Criterion 6: Effective forums

The public must be able to participate in an effective forum. A variety of techniques are used to give and receive information, including face-to-face discussion between parties.

Criterion 7: Information

Public participation provides participants with the information they need to participate in a meaningful way. High quality and understandable information is available.

Criterion 8: Enabling process

The process for public participation seeks out and facilitates the involvement of those people and groups potentially affected by or interested in a decision. It seeks input from participants on how they wish to participate (i.e. the process for providing input is not prescribed by the agency alone). The process provides for equal and balanced opportunities for all parties to participate effectively. The participation process is conducted in an independent, unbiased way.

Criterion 9: Feedback

The public participation process keeps participants informed of progress, and communicates to participants how their input affected the decision.

3. Methodology

3.1 INTRODUCTION

The evaluation considered six statutory management plan review processes, which had either recently been completed (i.e. the plans had been approved by the NZCA), or for which the public involvement part of the process had been completed (i.e. the written submission and hearing stages had been concluded). The six reviews included are:

- Abel Tasman National Park Management Plan
- Arthur's Pass National Park Management Plan
- Fiordland National Park Management Plan
- Kaimanawa Forest Park Conservation Management Plan
- Tongariro National Park Management Plan
- Whanganui National Park Management Plan

3.2 MANAGEMENT PLAN REVIEW CONTEXTS

The six reviews provide a useful range of processes and situations, with the study parks ranging from a small forest park frequented by hunters and primarily New Zealand back country trampers (Kaimanawa Forest Park), through to New Zealand's largest national park, which has huge commercial interests (Fiordland National Park). The Fiordland National Park review received the largest number of submissions to any of DOC's statutory planning processes to date.

A brief description of each of the planning reviews follows. Appendix 2 provides a fuller summary of the approaches used by each conservancy in relation to sections 47 (Procedure for preparing and reviewing management plans) and 48 (approval of management plans) of the National Parks Act. Each conservancy sought different levels of engagement with the public.

3.2.1 **Abel Tasman National Park Management Plan**

Abel Tasman, New Zealand's smallest national park, is located at the top of the South Island and was gazetted in 1942. The plan being reviewed had been approved in 1983. The review process studied was the second time this particular review has been initiated. The first intention to review was notified in July 1995, with a draft plan notified in March 1996. An amended draft plan was presented to the Conservation Board in March 1997, and later rejected, and DOC was asked to redraft it. The rejection related to issues about whether the foreshore of Abel Tasman National Park should be included in the Park. After several years, this issue was resolved through a separate process and the review of the plan could recommence. The second review began on 19 March 2005, with the intention to review being notified. A draft plan was notified on 28 January 2006, and submissions closed in May of that year. Two hundred and seventy-seven submissions were received, and 58 submitters heard. An amended plan was sent to the Conservation Board in June 2007, and from there sent to the NZCA in October 2007 (Heatley 2007). It was approved by the NZCA in October 2008.

3.2.2 Arthur's Pass National Park Management Plan

Arthur's Pass National Park is situated in the mountains between Canterbury and the West Coast in the South Island. It was established in 1929, making it New Zealand's third national park and the first in the South Island. As well as the usual statutes, the Ngāi Tahu Settlement Claims Act 1998 also provides direction regarding consultation. The process studied was the second review of the plan. The review was initiated in September 2004, and the plan was approved by the NZCA in December 2007. The plan review received 67 submissions (CACB 2007; DOC 2007a).

3.2.3 Fiordland National Park Management Plan

Fiordland National Park, established in 1952, covers a vast, remote area of wilderness in the southwestern corner of the South Island, much of which is inaccessible by road. It forms the main part of Te Wāhipounamu - South West New Zealand World Heritage Area. This review (the fourth review of the Fiordland plan) was initiated in June 1999, and the new plan was finally approved in June 2007. The draft plan received a lot of public interest, including 2107 submissions (DOC 2007b). As for Arthur's Pass, the Ngāi Tahu Settlement Claims Act 1998 also provides direction regarding consultation (e.g. s109).

3.2.4 Kaimanawa Forest Park Conservation Management Plan

Kaimanawa Forest Park is southeast of Taupo, extending from Tongariro National Park in the west to the Kaweka Ranges in the east. It was gazetted in 1969. This is the only Forest Park plan considered in this evaluation. The process studied was the second management plan for the park (DOC 2007c). The review began in December 2005 and the plan was approved by the Conservation Board in June 2007. Seventy-seven submissions were received.

3.2.5 Tongariro National Park Management Plan

Established in 1887, Tongariro was the first national park in New Zealand and the fourth in the world. It is located in the central North Island. The volcanic peaks at the core of the park were gifted to the people of New Zealand by Ngāti Tūwharetoa. It is a dual World Heritage area, a status which recognises the park's important Māori cultural and spiritual associations as well as its outstanding volcanic features. The implementation of *He Kaupapa Rangatira*, a framework and protocol, gives practical expression of the partnership between the managing authority and iwi, to ensure tāngata whenua have an evolving and ongoing role in the management of the park (DOC 2006b). The process studied was the fourth review of the park plan. The review was initiated in February 2002 and the plan became operative in 2006 when it was approved by the NZCA. The review process received 84 written submissions, and 32 submitters were heard.

3.2.6 Whanganui National Park Management Plan

Whanganui National Park, established in 1986, is located along the Whanganui River in the central North Island. The area has a unique river-based history; and Māori culture is an important part of the park experience. The first Whanganui management plan was approved in 1989. The National Parks Act contains specific instructions on the inclusion of the Whanganui River iwi (s30 (2a, b)). There is a

specific requirement that the Conservation Board shall have regard to the spiritual, historical, and cultural significance of the Whanganui River to the Whanganui iwi; and that it will seek and have regard to the advice of the Whanganui River Māori Trust Board on any matter that involves the spiritual, historical, and cultural significance of the park to the Whanganui iwi. The process studied was the first review of the Park's management plan. The intention to review was notified in June 2003. The draft plan was notified in July 2006, and submissions closed at the end of September that year. At the time of writing, the revised plan was still to be completed and presented to the Conservation Board. Seventy-four submissions were received, and hearings held for 22 submitters.

3.3 APPROACH

The two research methods used in this study were:

- A postal and online survey of people and organisations that prepared submissions to one or more of the six reviews. The findings from the survey were also used to inform the development of the key-informant interviews.
- Interviews with staff, members of the NZCA, members of Conservation Boards, and individuals and representatives of groups that prepared submissions.

3.3.1 Postal and online survey

The first research method used in the study was a postal and online survey of people and organisations that had prepared submissions to one or more of the six reviews. This part of the evaluation was conducted by a research company (Research New Zealand) on behalf of DOC. A self-completion survey was posted out to 1001 submitters. Respondents were also able to complete the survey online. With the exception of submitters to the Fiordland NPMP, wherein a random sample of 470 potential respondents were selected from the 1711 submitters whose contact details were still relevant, a census approach was taken in that all individuals or organisations who had made a submission to one or more of the above management plan reviews was contacted⁸.

Survey respondents were asked about their:

- Involvement in the management plan process
- Perceptions of the initial stages of the process
- Perceptions of the Draft Management Plan and submission process
- Perceptions of the follow-up to the submissions process
- Overall opinions on the review process

A copy of the survey form and covering letter is provided in Appendix 3.

Reminder letters were sent to those in the sample of submitters who had not responded after 2 weeks. Sixty surveys did not reach the intended recipient, either because of an incorrect address ($n = 55$) or because the recipient was reported as deceased ($n = 5$). A further nine recipients responded, saying they were not interested in participating in the survey.

⁸ Where an individual or organisation had submitted to more than one consultation process, they were asked to select just one to comment upon.

The survey process was completed between 27 July and 31 August 2007. A total of 231 completed surveys were received in this time, representing a 24.6% response rate. The total sample had a maximum margin of error of $\pm 6.1\%$ (95% confidence level). Table 4 shows the response rate and maximum margin of error for each of the case studies. The relevant data tables are attached in Appendix 5. The purpose of the study was to provide a collective understanding of barriers and facilitators to guide improvements to practice; therefore the results are reported on the total survey population.

3.3.2 Interviews

To obtain more detailed information on participants' experiences and to expand on the findings from the survey, a small number of participants were interviewed. In consultation with the relevant conservancy management planners, a number of submitters to the Abel Tasman, Arthur's Pass, and Whanganui management plans were identified (to enable recall, as these plans were those in the sample that had been prepared most recently), and invited to be interviewed. Interviewees were selected so that one or more of the three study reviews were covered; they were able to provide both a regional as well as a national perspective; they had a wide geographical spread; and they represented a range of stakeholders.

In total, 26 key-informant interviews were conducted with stakeholders involved in the management plan reviews, and representatives from five national interest groups. Fifteen submitters, six DOC staff, four conservation board members, and one NZCA member were interviewed. Each interview was conducted by one of the three researchers on the evaluation team.

All interviews followed a set interview schedule (Appendix 4). Interviewees were asked to comment on the specific management plan review and also invited to draw on their knowledge and experience of other planning processes. The interview topics covered:

- Purpose of public involvement
- Scope of reviews and level of involvement
- Methods for public involvement
- Results
- Resources and capacity
- Representation

TABLE 4. MARGINS OF ERROR AND RESPONSE RATES FOR EACH OF THE MANAGEMENT PLAN CASE STUDIES.

PLAN	<i>n</i>	RESPONSE RATE (%)	MAXIMUM MARGIN OF ERROR ($\pm\%$)
Abel Tasman NPMP	59	25.7	11.3
Arthur's Pass NPMP	24	40.0	16.1
Fiordland NPMP	73	16.2	11.2
Kaimanawa FPCMP*	26	40.6	15.6
Tongariro NPMP	16	24.2	22.0
Whanganui NPMP	33	50.8	12.8
Total	231	24.6	6.1

* Forest Park Conservation Management Plan.

4. Survey results—public involvement in management plan reviews

4.1 INTRODUCTION

This section summarises the key results from the self-completion postal survey (also available online) sent to people and organisations that had made written submissions on the Abel Tasman, Arthur’s Pass, Fiordland, Tongariro and Whanganui National Park Management Plan reviews, and the Kaimanawa Forest Park Conservation Management Plan review. This section first examines the profile of respondents to the survey. It then describes respondents’ involvement in the management plan review process. This is followed by a description of respondents’ involvement in the early consultative stages of the process (prior to the release of a draft management plan), experiences in responding to an actual draft management plan (through written submissions, attending a hearing, or other ways), and experiences following the submission period. The section concludes with respondent views of the overall process.

4.2 PROFILE OF SURVEY RESPONDENTS

Most respondents to the survey completed their submission as an individual (59%), rather than as a representative or member of an organisation (29%) (Table 5). A small proportion replied that they wrote their submission as both an individual and a representative of an organisation (6%), although this was not offered as a response category.

Survey respondents generally belonged to outdoor recreation, conservation, or environmental groups (Table 6): 69% of those who said they completed their submission as individuals are members of such groups; and of those who completed their submission on behalf of an organisation (Fig. 4), 40% did so as representatives of an outdoor recreation group, 12% as representatives of conservation or environmental groups, and 10% for businesses.

TABLE 5. SUBMISSION REPRESENTATION.

PROPORTION OF RESPONDENTS (%)	
Individual	59
Organisation	29
Other	6
Both individual and organisation	6
No response	0
Total*	100

* Total number of submissions = 231.

TABLE 6. RESPONDENTS’ PARTICIPATION IN OUTDOOR RECREATION, CONSERVATION OR ENVIRONMENTAL GROUPS.

PROPORTION OF RESPONDENTS (%)	
Yes	69
No	30
No Response	1
Total*	100

* $n = 150$ —a sub-sample based on those who completed the submission as an individual.

Figure 5 shows the distribution of all respondents by age group. Only 4% of respondents were aged under 30 years, 35% percent were aged 60 years plus, and 29% were between 50 and 59 years old.

Almost three-quarters of respondents were male (74%) and 23% were female (see Table 7). Submitters to the Fiordland National Park plan were more likely to be male (92%) than the total sample, while submitters to the Whanganui National Park plan were more likely to be female (45%) than the total sample.

As shown in Fig. 6, the majority of respondents were European, New Zealand European, or Pakeha (68%). A substantial proportion (37%) also identified as New Zealander or Kiwi (respondents could identify with more than one ethnicity). Only 4% identified as Māori, and 1% as Pacific Islander.

Figure 4. Types of organisations respondents represented ($n = 92$). Subsample based on those who completed a submission as a representative of an organisation. Total may exceed 100% because of multiple responses.

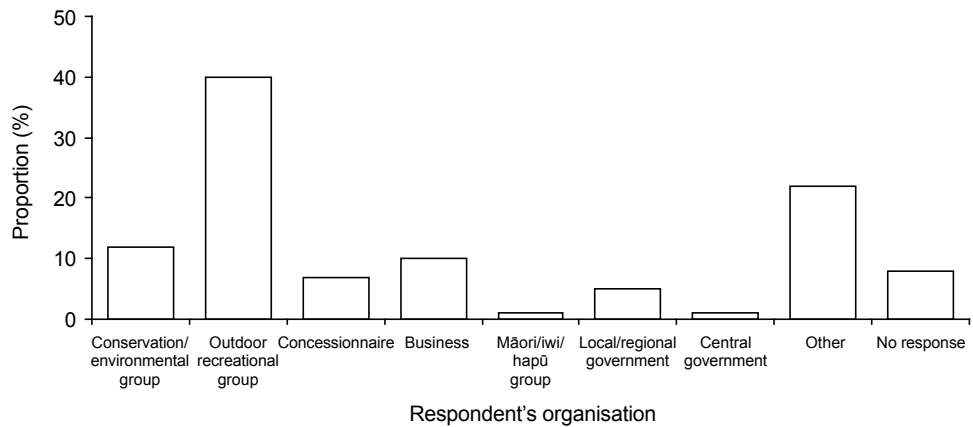


Figure 5. Age of respondents ($n = 231$).

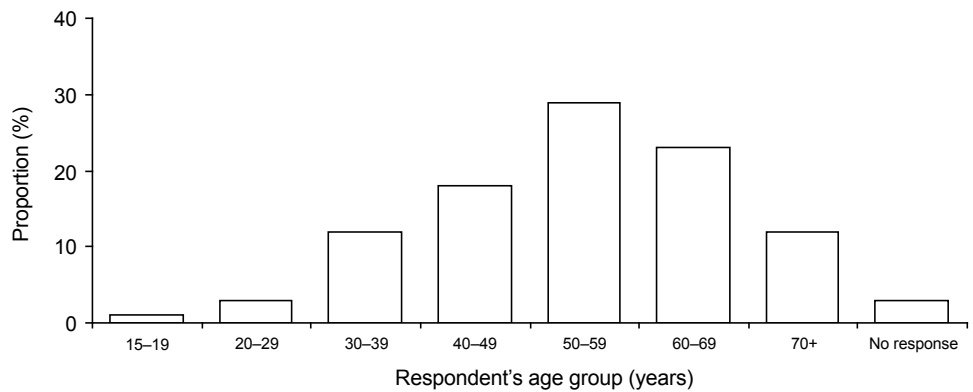


TABLE 7. GENDER OF RESPONDENTS.

PROPORTION OF RESPONDENTS (%)	
Male	74
Female	23
No Response	3
Total*	100

* $n = 231$.

Forty percent of respondents had a Bachelor's degree or higher, as shown in Fig. 7. Submitters to the Fiordland National Park plan were less likely to hold a Bachelor's or higher degree (15% compared to 40% of total sample).

Most submitters were full-time salary or wage earners (37%), self-employed/business owners (33%), or part-time salary or wage earners (9%) (Table 8). About one-fifth (21%) were retired.

About one-fifth of survey respondents (21%) earned \$30,001 to \$50,000, and about one-third (33%) earned over \$50,000 (Fig. 8). Another fifth (23%) preferred to not say what their gross personal income was in the last year.

Figure 6. Ethnicity of respondents. Total may exceed 100% because of multiple responses.

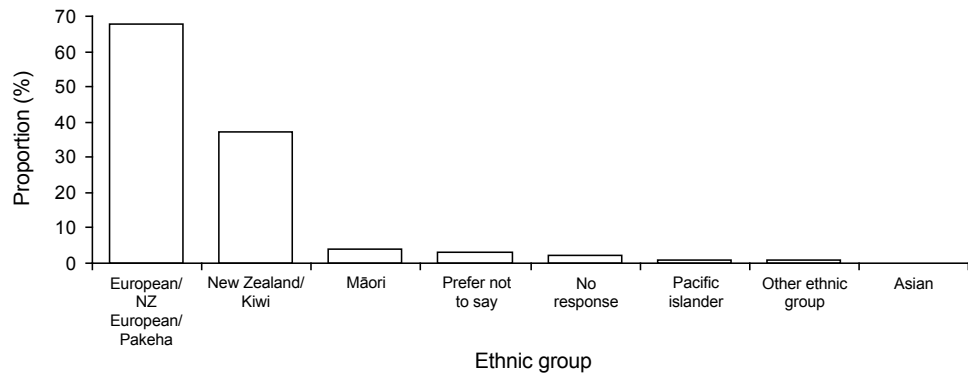


Figure 7. Highest qualification of respondents (n = 231)

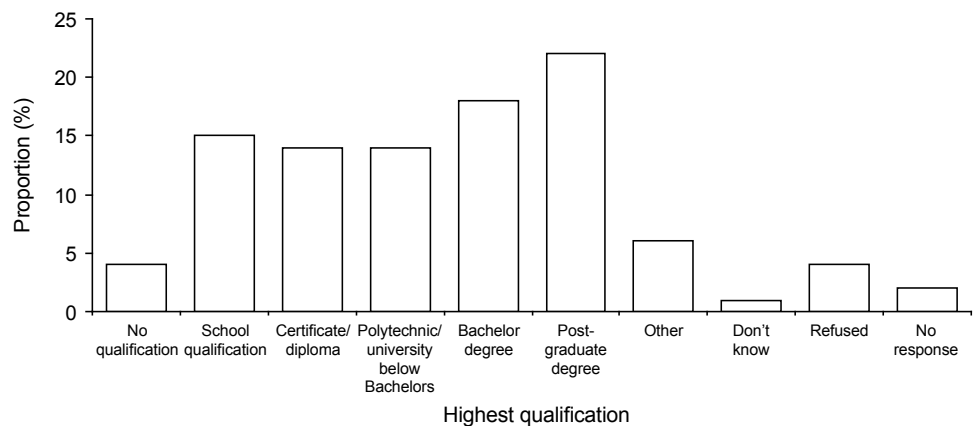
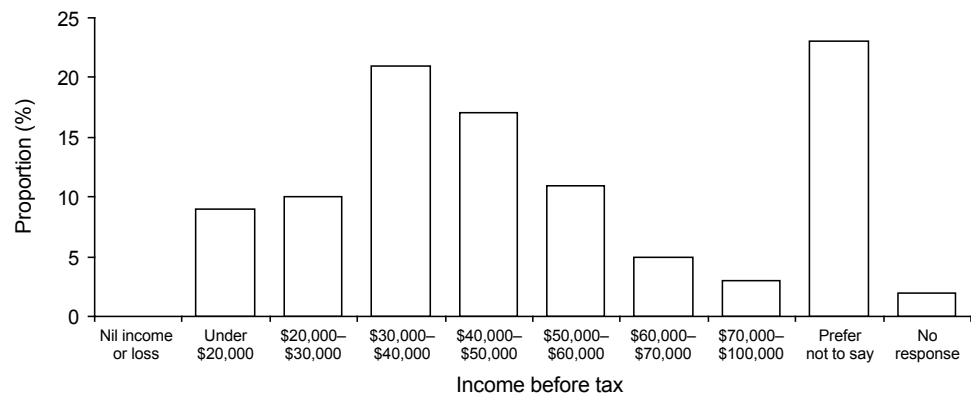


TABLE 8. EMPLOYMENT STATUS OF RESPONDENTS (n = 231).

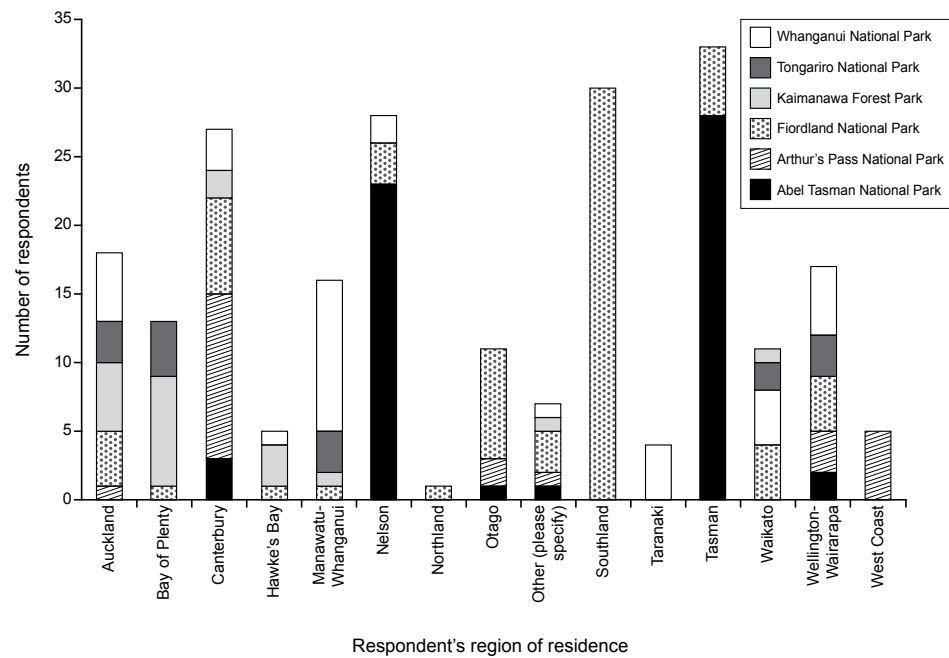
PROPORTION OF RESPONDENTS (%)	
Full-time salary or wage earner	37
Self-employed/Business owner	33
Retired	21
Part-time salary or wage earner	9
Other	5
Student	3
Full-time home-maker	2
Prefer not to say	1
No response	1
Unemployed	0
Other beneficiary	0

Figure 8. Gross annual income of respondents ($n = 231$).



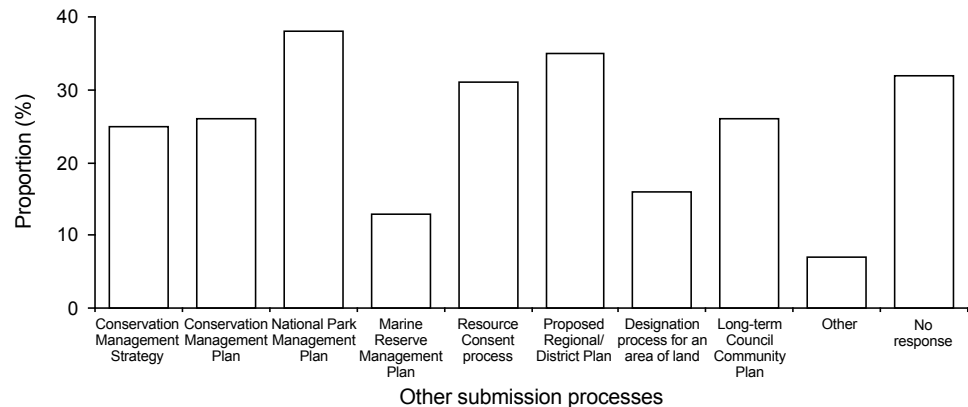
Respondents were located throughout New Zealand, but tended to be clustered in areas around the study parks (Tasman 14%, Southland 13%, Nelson 12%, Canterbury 12%) and, to a lesser extent, in the main population centres (Fig. 9). Those respondents who made a submission on the Abel Tasman plan were more likely to live in Tasman District (47% compared with 14% of the total sample) or Nelson (39% compared with 12% of the total sample). Those who made a submission on the Fiordland plan were more likely to come from Southland (41% compared with 13% of the total sample). Those who made a submission on the Whanganui plan were more likely to be from Manawatu-Wanganui (33% compared with 7% of the total sample).

Figure 9. Submission responses by locality of submitters.



Many submitters said that they had also been involved in preparing submissions for other protected areas or environmental management plans (Fig. 10). Of the submitters, 38% had previously prepared a submission on another national park management plan, 35% had made a submission on a proposed regional or district plan, and 31% had been involved in a resource consent process. Notably, those who made a submission on the Fiordland plan were less likely to have also made a submission on a proposed regional or district plan (18% compared with 35% of the total sample) or a long-term community plan (12% compared with 26% of the total sample).

Figure 10. Respondents' involvement in other submission processes ($n = 231$). Total may exceed 100% because of multiple responses.

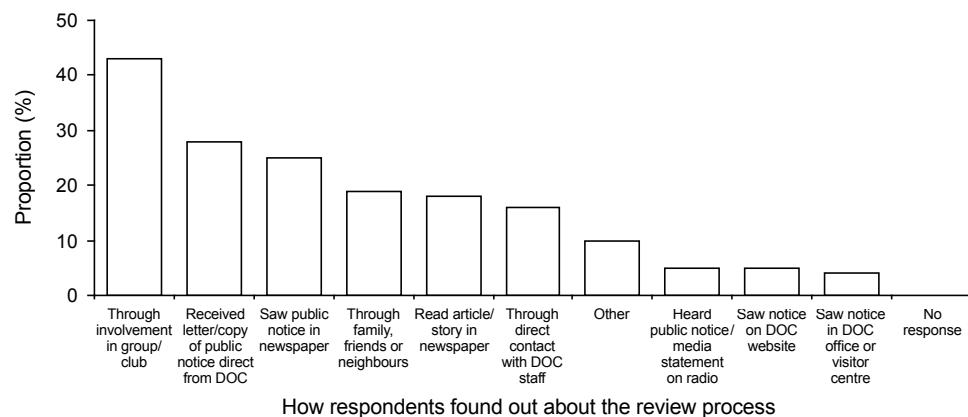


4.3 GETTING INVOLVED IN THE MANAGEMENT PLAN REVIEW PROCESS

This section describes how respondents became involved in the management plan review process, as well as the ways in which they participated in the overall review process.

Many respondents became involved in the review process through membership of a group or club (43%), after receiving a hard copy of a public notice directly from DOC (28%) or after seeing a public notice in a newspaper or other publication (25%) (Fig. 11). Only 5% reported seeing a notice on the DOC website. Submitters to the Abel Tasman plan were more likely than others to have heard about the review process by reading about it in a newspaper or magazine article (36% compared with 18% of the total sample). Submitters to the Fiordland plan were less likely than others to have found out about the review by receiving a letter or a copy of the public notice from DOC (14% compared with 28% of the total sample).

Figure 11. Mechanisms by which respondents became aware of the management plan reviews ($n = 231$). Total may exceed 100% because of multiple responses.



When asked to provide the most common reasons for getting involved in the review process, the respondents' open-ended comments could be grouped as follows:

- To protect or promote an interest as a park visitor or user (26%); for example:
A proposed change would adversely affect my efforts to train people to safely enjoy the outdoors.
Preserve camping interests at the park.
- To exercise one's democratic right (23%); for example:
The Park belongs to the people of NZ. Therefore we have a right to say how it is managed.
Because us Kiwis have the right to go into these places.
- To safeguard local community interests (19%); for example:
Because the Department was planning to stop maintenance on huts which are well used by boaties.
Because it is important that the plan reflects the importance of the SH 73 link between Westland and Canterbury.

Table 9 shows the ways respondents contributed to the review process. Respondents were provided with a list of eight items to choose from (allowing multiple responses). Almost three-quarters of respondents said they prepared a written submission on the draft management plan (74%). As the survey sample is based on people who made written submissions, it is possible that people have misinterpreted this question, i.e. the total should be 100%. Almost half made suggestions at an earlier consultation stage (48%), a quarter attended a hearing (25%), nearly a fifth attended a meeting to discuss proposals in the draft plan (19%), and 14% attended a meeting at an earlier consultation stage. Submitters to the Fiordland plan were less likely than others to attend a formal hearing to present an oral submission on the draft management plan (11% compared with 25% of the total sample).

Just under half (48%) of respondents indicated that they did not want the opportunity to be involved or contribute to the submissions process in any way other than how they had done. Some people would have liked to have had the opportunity to be involved in a public or interest group meeting to discuss the

TABLE 9. WAYS RESPONDENTS CONTRIBUTED TO THE REVIEW PROCESS ($n = 231$).

	PROPORTION OF RESPONDENTS (%)*
I prepared a written submission on the draft management plan	74
I made written suggestions on what should be included in the draft	48
I attended a formal hearing to present an oral submission on the draft management plan	25
I attended a public meeting or an interest group meeting to discuss suggestions on what should be included in the draft plan or in response to a discussion paper	14
Other	10
I was approached for advice or views on specific issues	7
I was contacted to clarify some aspects of my submission	4
No response	3

* Total may exceed 100% because of multiple responses.

actual draft management plan (16%); to discuss what should be included in the draft management plan (14%); to make written suggestions on what should be included in the draft plan or to have commented on a discussion paper (14%); and to have attended a hearing (10%).

4.4 PERCEPTIONS OF THE INITIAL STAGES OF THE PROCESS

This section focuses on the initial stages of the management plan review process, particularly the involvement respondents had in this stage, the information received and its usefulness, feedback provided to DOC, and any meetings attended.

Just under two-thirds (65%) of respondents received some form of information or a discussion document outlining the key issues for the draft management plan (Table 10). Of those who received information ($n = 151$), many received a discussion document (45%). One quarter of respondents (25%) received information outlining the review process and almost as many (23%) received information outlining key management planning issues covered in the review (all in the form of a letter, a pamphlet or an information pack).

Just over three-quarters (76%) of respondents who received initial information indicated that the information was helpful in understanding the review process, and 68% indicated that the information was helpful in understanding the issues covered in the review (Fig. 12). Nearly a quarter of respondents thought the initial information was helpful because it provided a useful basis for comment (24%); for example: *As I recall I was able to quickly group the issues in which I was interested*. A small number thought it was unhelpful because the issues appeared to be pre-determined by DOC (7%) or because the information was too complicated (5%). Nearly half of the respondents (47%) did not provide further explanation.

Just under half of respondents (48%) provided feedback or suggestions to DOC in the initial stage of the review. Of those who provided feedback at this stage ($n = 111$), the majority (71%) reported using personal experiences or knowledge of the area as sources of information for putting their feedback together (Fig. 13).

TABLE 10. TYPE OF INFORMATION RECEIVED BY RESPONDENTS ($n = 151^*$).

	PROPORTION OF RESPONDENTS (%) [†]
A discussion document	45
A letter, a pamphlet or an information pack outlining the review process	25
A letter, a pamphlet or an information pack outlining key management planning issues covered in the review	23
A copy of the existing approved management plan for the area	16
A copy of particular sections of the new plan as it was being drafted	20
Other	9
Don't know	5
No response	3

* Subsample based on those who received initial information.

† Total may exceed 100% because of multiple responses.

Figure 12. Respondents' assessments of how helpful information received was for understanding the review process and issues covered ($n = 151$: subsample based on those who received initial information).

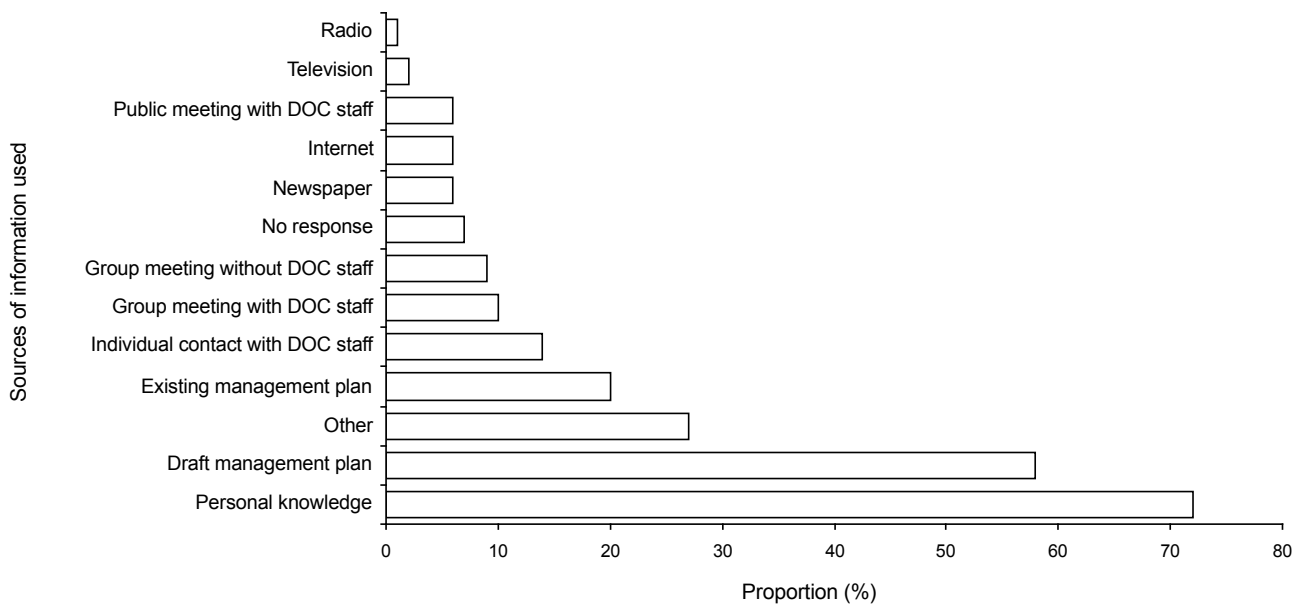
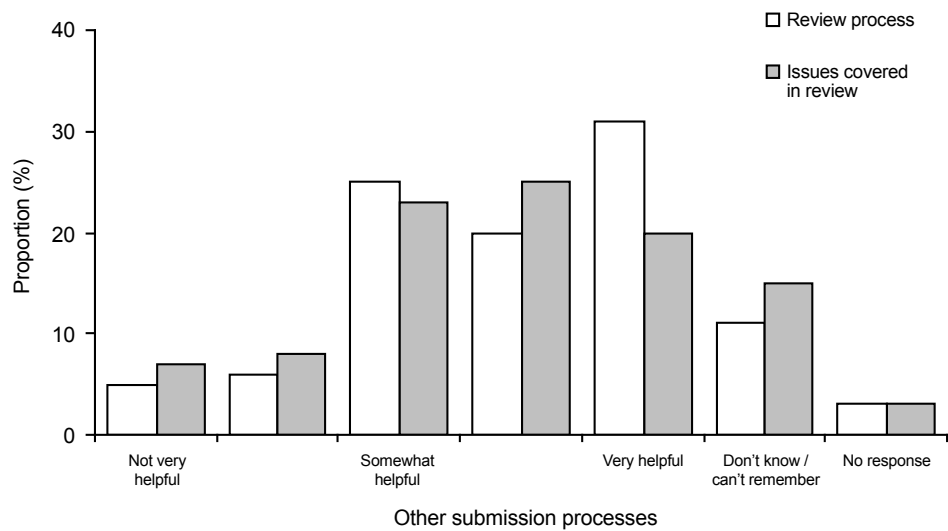


Figure 13. Sources of information used in putting together feedback ($n = 111$: sub-sample based on those who provided feedback at the initial stage of the review). Total may exceed 100% because of multiple responses.

Forty-one percent said they used a discussion paper and 22% used an individual meeting or contact with DOC staff.

Almost one-quarter of respondents (24%) attended a public or interest group meeting during this early stage of the review process. Of those respondents, 75% said they found the meetings helpful in understanding the issues covered in the review. However, 20% said the meetings were not helpful.

The remaining 76% who did not attend meetings during this initial stage were asked why they did not attend. The main reasons for not attending were the location of the meetings (30%), and respondents being unaware of the meetings (27%), or the time or date the meetings were held (22%) (Table 11). Abel Tasman plan respondents were less likely to give the location of the meetings as a reason for not attending (11% compared with 30% of the total subsample).

TABLE 11. REASONS RESPONDENTS GAVE FOR NOT ATTENDING MEETINGS IN THE INITIAL STAGES OF THE REVIEW ($n = 111^*$).

	PROPORTION OF RESPONDENTS (%) [†]
Location prevented me	30
Didn't know about any meetings	27
Time/date prevented me	22
Other	16
Meeting not available	13
Didn't think it would be helpful	11
No response	6
Wasn't that interested	3

* Subsample based on those who did not attend meetings during the initial stage of the review.

† Total may exceed 100% because of multiple responses.

Two-thirds of respondents did not see any way the information they received could be improved (52% no response, 8% happy with information, and 6% don't know). Some suggestions were made to improve the initial stage of the management plan review. The comments made can be grouped along the lines of the following examples:

- Improved notification and updating (7%):

It would be good to be kept in the loop after our written submissions were made.

It is difficult to know when new draft management plans are coming out, other than regularly checking the DOC website. Maybe there could be better ways of letting user groups know.

- Better opportunities for input (5%):

Living in North Island, so not able to attend meetings in South Island. More use of internet.

Would have been good to talk to some DOC staff involved

- More information (5%):

More summaries, concise ways of presenting information.

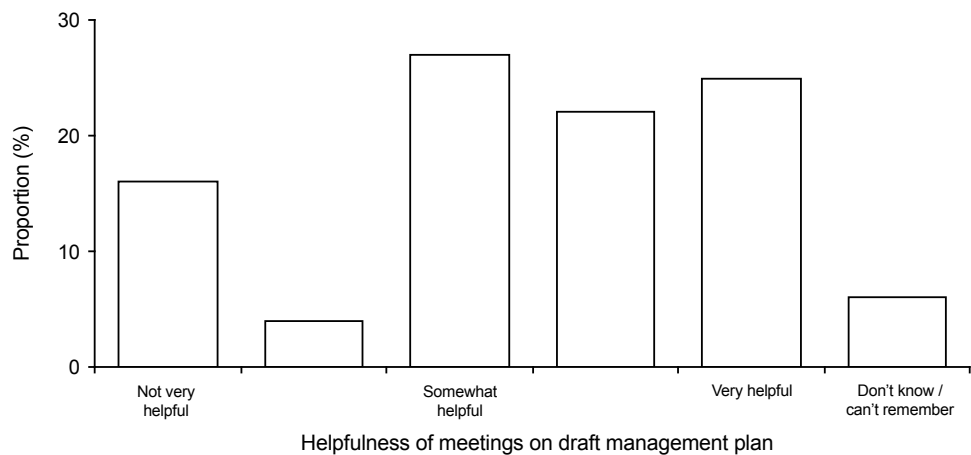
More information about [the] plan.

4.5 PERCEPTIONS OF THE WRITTEN SUBMISSION PROCESS

This section describes respondents' attendance of meetings after the release of the draft plan, sources of information used to put together their submission, and attending meetings (hearings) to speak in support of their written submission.

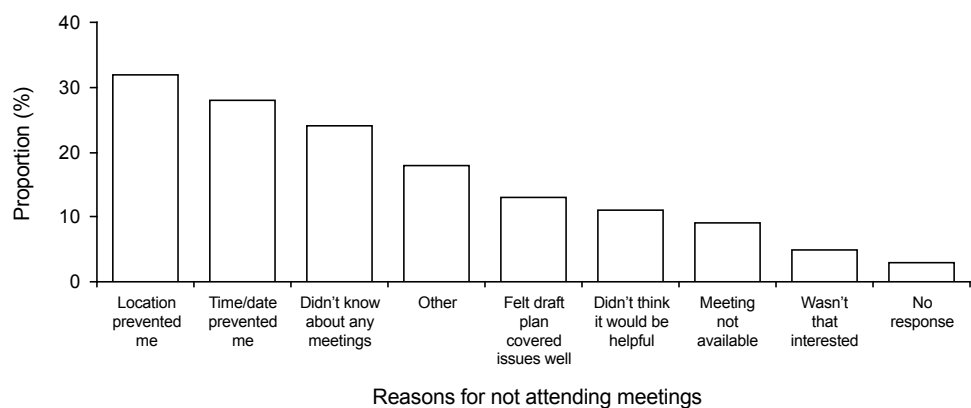
One-fifth of the respondents (22%) attended a public or interest group meeting with DOC after the draft plan had been released. Of those who attended a meeting at this stage, almost three-quarters (74%) indicated that the meeting had been helpful in improving their understanding the issues covered in the draft management plan, although 20% believed the meetings were not helpful (Fig 14).

Figure 14. Respondents' assessment of helpfulness of meetings for improving their understanding of issues covered in draft management plan ($n = 51$; subsample based on those who attended meetings after the plan had been released).



For those respondents who did not attend, the main reasons for this were the same as those given by respondents for not attending a meeting during the initial stages (Fig. 15): prevented by location (32%), prevented by time/date of meetings (28%), or did not know about any meetings (24%). Respondents who made a submission to the Abel Tasman plan were significantly less likely to say that the reason they did not attend was because the location prevented them (11% compared with 32% of the total sub-sample). Respondents submitting to the Fiordland plan were also significantly less likely to say they did not attend because they did not know about any meetings (8% compared with 24% of the total subsample).

Figure 15. Reasons respondents gave for not attending meetings on draft management plan ($n = 180$; subsample based on those who did not attend meetings after plan was released).



The most common source of information used in putting together a submission was, by some margin, personal experience and/or knowledge of the area (72%), as shown in Fig. 16. Other sources of information used in putting together a written submission on the draft management plan were the draft plan itself (58%), other sources (27%), and the existing approved management plan (20%). Interestingly, respondents submitting to the Whanganui National Park plan were significantly more likely to have used the internet for this purpose (24% compared with 6% of the total subsample).

Nearly two-thirds of respondents (65%) thought that the draft management plan alone provided enough information for them to make a submission. Nearly a quarter (24%) did not, and of those who thought the draft plan did not provide enough information ($n = 81$), 46% did not say what other information they would have liked. Fourteen percent, however, would have liked further clarification and explanation of proposals, and 11% would have liked more background information.

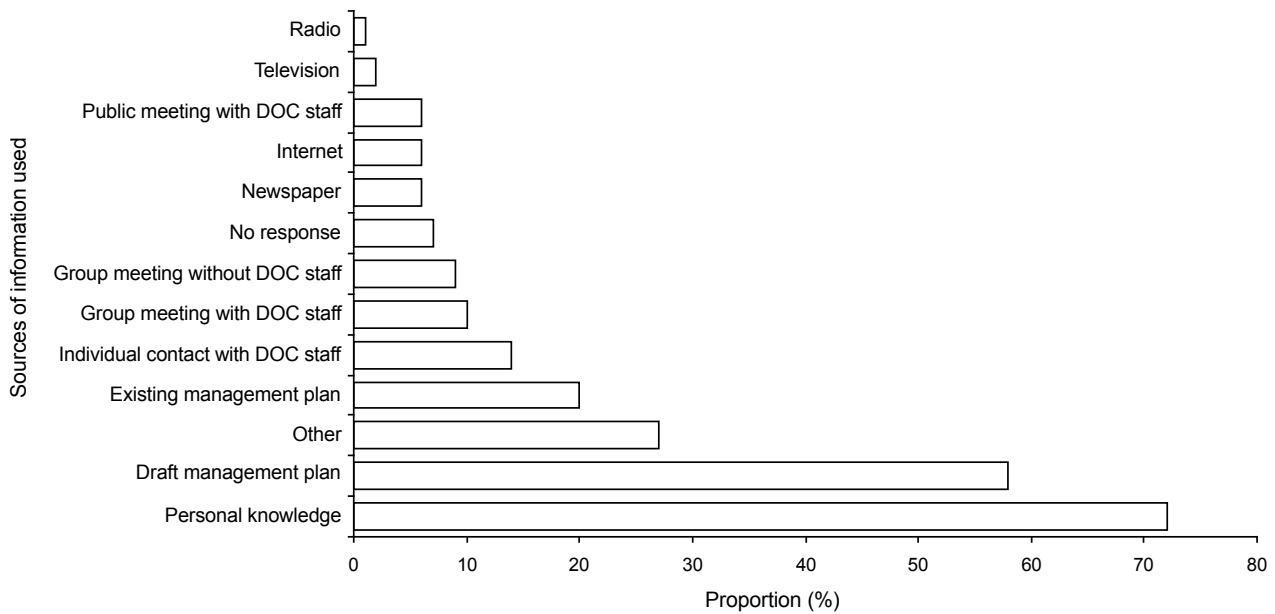


Figure 16. Sources of information used by respondents in putting together written submission ($n = 231$). Total may exceed 100% because of multiple responses.

When asked to rate the information that was provided in the draft management plan, 52% said that it was adequate and covered the key issues, and 48% said it was easy to understand (Fig. 17). Those who made a submission to the Fiordland National Park plan were significantly less likely to say the information provided was adequate and covered all key issues (14% compared with 28% of the total subsample), and that it was very easy to understand (8% compared with 20%). For all plans, nearly one-third of respondents (31%) said that the plan was unbalanced and biased, and 23% of submitters rated the information provided in the draft management plan as balanced and unbiased.

The majority of respondents (83%) said that making a written submission was their preferred way of participating in the plan review. The main reasons why a written submission was preferred were because it was more convenient (19%), or because it provided the best opportunity to make considered comment (e.g. they had time to prepare, reflect, review, and change their views) (14%), or that a written document carried the most weight or chance of influence and provides an official record (10%). Just 6% of respondents would have preferred to meet and discuss the review issues.

When asked about ways in which respondents felt their participation in the review process could have been improved, 61% provided no response to this question, 11% said the process was adequate, and 5% said they did not know. A few people wanted more opportunities for public meetings (4%), and more opportunities to talk with DOC staff (3%).

One-quarter (25%) of respondents attended a hearing to speak in support of their written submission. A few respondents (6%) had someone else speak in support of it. For those who spoke in support of their submission, 70% found it easy to do so. Of those who did not ask to be heard in support of their submission (69%), 45% said this was because they felt their written submission was enough, 27% said the location was not accessible, and a further 23% said they had work obligations (see Table 12).

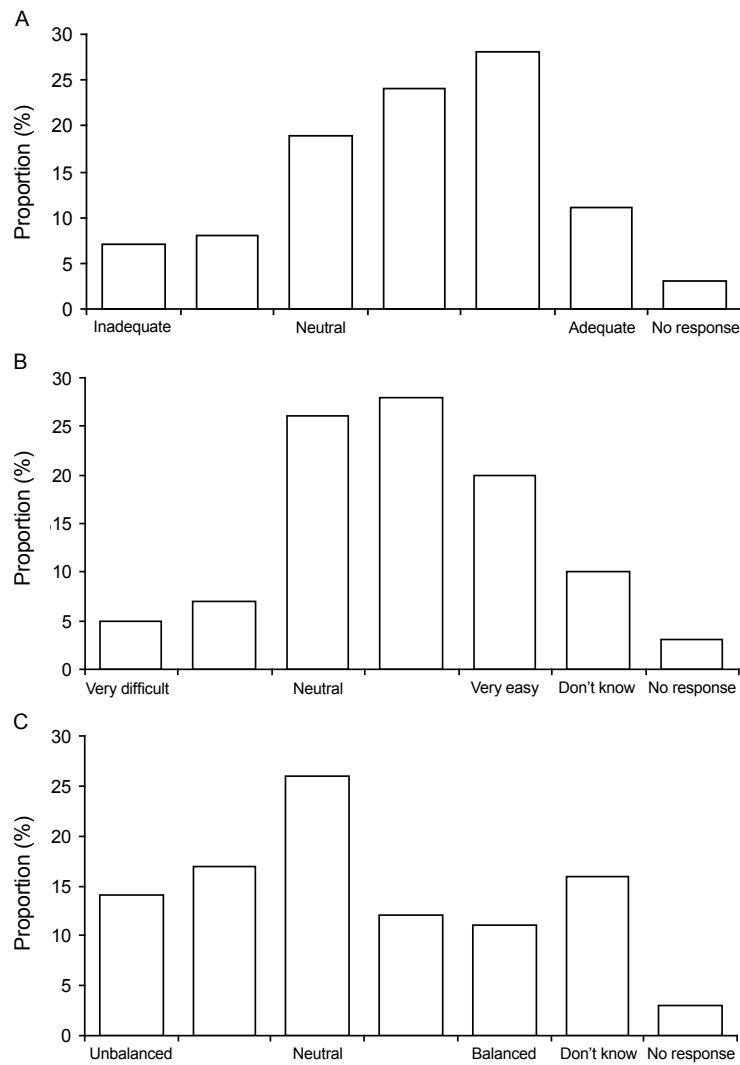


Figure 17. Respondents' views on standard of information provided in plan. A = Cover of key issues, B = Ease of understanding, C = Perceived bias ($n = 231$).

TABLE 12. REASONS RESPONDENTS GAVE FOR NOT SPEAKING IN SUPPORT OF SUBMISSIONS ($n = 168^*$).

	PROPORTION OF RESPONDENTS (%) [†]
I felt written submission was enough	45
Location was not accessible	27
I had work obligations	23
Other	23
My interests were being represented by someone else	19
Time/date prevented me	18
I don't like hearings	9
My submission was in support of draft management plan and I did not feel it was necessary to speak to this	7

* Subsample based on those who did not ask to be heard in support of their submission.

† Total may exceed 100% because of multiple responses.

Most respondents (a total of 75%) did not offer any suggestions on how the formal hearing process could be improved (62% offered no response to this question, 8% said the process was adequate, and 5% said they did not know). The most common suggestions for improvement were:

- More accessible formal hearings, such as local meetings, weekend hearings, opportunity to video-conference (6%)
- An independent, neutral and unbiased panel for the hearing process (5%)

4.6 PERCEPTIONS OF FOLLOW-UP

This section describes respondents' views on the usefulness of feedback provided after the submission process. At the time of the survey, not all of the management plan review processes included in the survey had reached a stage of providing feedback to submitters. Respondents were asked to complete all relevant parts of this section of the survey based on their experiences to date. Feedback on the Kaimanawa plan was sent during the survey period. At the time of the survey, formal feedback had not yet been provided for the Abel Tasman and Whanganui plans.

Less than half of the respondents (45%) reported receiving written feedback about their submission on the management plan review; with over half saying they had not received feedback on their submission (55%). Those who made a submission to the Abel Tasman and Whanganui plans were significantly less likely than others to have received written feedback (19% and 21% respectively, compared with 45% of the total sample). As these review processes were not complete at the time of the survey, many respondents were yet to receive feedback. Those who made a submission to the Fiordland plan were significantly more likely to have received written feedback (68% compared with 45% of the total sample).

Forty percent of those who received feedback ($n = 104$) considered it useful or very useful (Fig. 18).

Of the 127 respondents who had not received any written feedback about their submission, most (70%) thought it would have been useful to receive it.

One-fifth (20%) of respondents believed the management plan review took all points of view into account, but another fifth (21%) thought the review did not take these into account (Fig. 19).

When asked to provide additional comments on how well views were taken into account, most people offered no response to this question (55%), or said they did not know (16%). There were, however, several people who made comments about stakeholder interference and equality (e.g. they felt that the public consultation process did not reach enough park users, visitors, or the wider public) (8%), or who made comments about political interference (5%). A small number also gave generally supportive comments (6%).

Figure 18. Respondents' assessment of usefulness of feedback on submissions ($n = 104$; subsample based on those who had received written feedback about their submission).

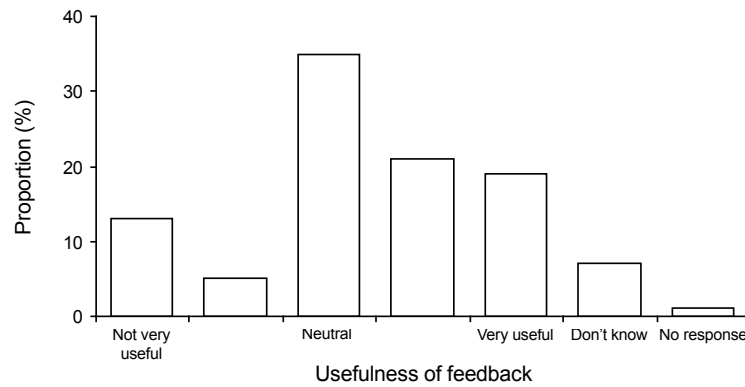
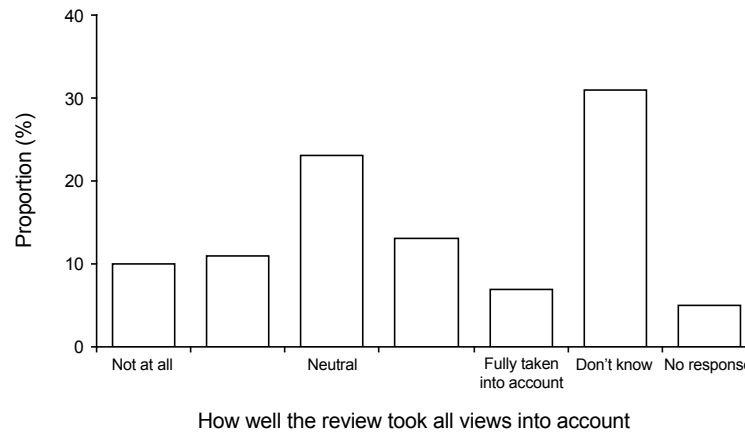


Figure 19. Respondents' assessment of how well all views were taken into account in the review ($n = 231$).



4.7 OVERALL OPINIONS OF THE REVIEW PROCESS

This section describes the respondents' overall views on the opportunities for public involvement in the review process. Respondents were given the opportunity, through three open-ended questions, to nominate the key strengths and weaknesses of the review process, and also to give any final feedback on how they thought the process could be improved.

Opinions on what were the key strengths of the review process were fairly evenly divided across a number of areas, though the most frequently cited strengths were that:

- The process was open and accessible (12%)
- The process was well publicised and notified (12%)
- There were opportunities for public/consultation meetings (10%)

There was also a wide spread of responses when submitters were asked what the key weaknesses of the process were, for example:

- The duration of the review (14%)
- That there was political interference in the process (9%)
- That there was a lack of opportunity to engage and debate the issues (8%)
- That there were issues with stakeholder representation and inequality between submitters (8%).

The three main ways in which respondents felt the process could be improved were:

- To make the process more open, and to have less political interference (10%)
- To have fairer stakeholder representation and equality (7%)
- To provide better feedback (7%)

5. Main findings: key-informant interviews

5.1 INTRODUCTION

The results presented in this section are based on 26 key-informant interviews with stakeholders involved in the Abel Tasman, Arthur's Pass and Wanganui NPMP reviews, and with representatives from five national interest groups. Some of those interviewed had been involved in more than one process (previously and/or currently) and used their wider experience to respond to the questions posed.

The purpose of the interviews was to expand on the findings of the survey and to obtain more detailed information on participants' experiences.

The interviews were based on predetermined topics based on the literature, the research objectives and findings from the quantitative survey. The topics addressed were:

- The purpose of public involvement
- The scope of NPMP reviews
- Methods used to involve the public
- Resources and capability
- Representation

Additional topics that emerged from the interviews were also included.

The findings from the interviews are presented below. The implications of these findings and the survey results presented in the previous section will be discussed in Section 6 to help understand the effectiveness of public participation in DOC's consultation processes and identify facilitators and constraints to this involvement.

5.2 PURPOSE OF PUBLIC INVOLVEMENT

When plans are reviewed, public involvement was identified as a way of 'putting a finger on the pulse of the community' and re-evaluating the direction of park management. Community consultation was described by one interviewee as being a process to create 'shared ownership'. There was general agreement that many of the people who get involved in the consultation process have a recreational or financial interest, or a strong sense of stewardship, and want to contribute to the future management direction of the park. Consultation was described as providing an opportunity to get stakeholder 'buy-in' and to 'get people on board' to support the development and implementation of the plan, and that it could help to build trust between DOC and stakeholders, and create shared ownership:

Where people can see the value of direct involvement in a plan, especially if [they] can see their issue reflected in the plan, it can be quite empowering.

While there was wide consensus that public consultation is important, the expected level and nature of that consultation and the perceived value of the consultation process varied across interviewees. A number of stakeholder interviewees were wary or cynical about the consultation process and felt that often DOC was paying ‘lip service’ to it, or that it was ‘tokenism’ or ‘a charade’:

I have little faith in the [consultation] process. They [DOC] have to do it but they don't have to listen.

Myself and most of the people doing submissions thought it was a pointless process but we thought our voices should be heard.

A number of stakeholders interviewed believed that there are plenty of opportunities for people to be involved, and that there is a risk of over consultation:

The problem with consultation processes is that people have been over consulted.

A DOC staff member commented that:

There is a tendency for DOC staff to consult more than is provided for in the Act; start to muddy the process in the Act. There are costs to trying to be too inclusive. It seems to be a given that we [DOC] have to consult, but we have to do what is required in the legislation [not more]. Unconstrained consultation can cause lots of costs ... be sensible about what is needed.

When discussing the purpose for public input, the frequency of reviews was also raised. There was wide consensus amongst interviewees of the importance of regularly reviewing park management plans to take account of environmental and social changes. The demands and pressures on a park evolve over time and many examples were given of unanticipated changes that can be addressed through a plan review. These included demands for access by film crews, mountain bikers, and four-wheel-drive vehicles. Other examples included new species under threat or technological developments such as the construction of mobile phone towers. A plan review was described as providing the opportunity to keep pace with pressures while maintaining the values of the park.

On account of the constantly evolving and changing pressures and demands on national parks, most interviewees commented that a plan review should not be left any longer than 10 years. Some interviewees suggested that, ideally, the plans should be reviewed more regularly, but this was deemed unrealistic, as some plans had taken many years to finalise, and in some cases there had not been an active plan in place for a long period of time:

There should only be a 10-year approach to conservation management as it is dynamic. But it's a problem when it takes 10 years to write a plan ... a resourcing issue.

Further views on the consultation processes are discussed in Section 5.4.

5.3 SCOPE OF NPMP REVIEWS

The Department of Conservation develops and implements a number of different policies and plans upon which the public are invited to provide submissions. Interviewees were asked whether submitters were clear about the scope of the NPMP reviews and understood what was covered by a NPMP as opposed to a CMS or DOC's general policies.

Interviewees thought that the groups and individuals who submit on plans are often concessionaires or from professional interest groups with an ongoing relationship with DOC. These people were believed to have a good understanding of the role and scope of the various plans, and able to give feedback at the level DOC expects. A number of interviewees acknowledged that it would be difficult for anyone to get involved who was not familiar with plan processes and the hierarchy of the various plans and strategies. While the people interviewed for this research did appear to have a clear understanding, some DOC staff interviewed said they have had to explain many times the relationship between the general policies, CMSs, NPMPs and DOC's organisational structure:

Our systems and structure are complex. They are important to us, but not so important for the public.

While most interviewees appeared to have a fairly clear understanding of DOC's statutory planning hierarchy, there were varying views on the level of detail that should be included within NPMPs. Some interviewees questioned whether management plans should be more operational, as the general policies and CMSs set the broad strategic directions. One DOC staff member interviewed asked:

How much in the General Policy covers what is sitting in the individual national park management plans? You could put a lot of it aside and then say here are the issues that are crunchy for us around this specific national park and this is what consultation is covering. If left at General Policy level we would be reducing the ability of the local population to have much say in where the park is going. So we need something locally but do we need another strategic document or a bit more of a real management plan?

A stakeholder interviewee commented:

Our frustration with DOC plans is that they are all about high level stuff already in the Act and General Policy. When you get down to the nitty gritty you hit a stone wall. All through the plans it says 'that depends on operational priorities' ... no real commitment to do anything, just lots of fine words ... a bit sad.

Several interviewees questioned whether 'management plan' was the right name for this document and instead suggested it was a 'strategic plan' that set the direction for the next 10 years rather than a management plan to deal with specific budget priorities:

I struggle with calling it a management plan in some ways—it is kind of a strategic overview for the National Park. To me a management plan would be more prescriptive and probably cover a shorter time period and would have some timelines and dollars attached to it.

Is it a management plan? The 'mights' and 'mays' suggest it is not meaty enough to be a management plan. The plan hardly ties DOC down to anything.

On the other hand, one interviewee argued that a 10-year plan should not be too constrained:

Plans don't want to be so constraining. Priorities and views evolve within the 10-year timeframe so don't want a plan that is so rigid that it is cutting off all avenues, but it is instead laying down some fundamental principles as to where we are going to be going over the next 10 years.

There were also comments on the variation in levels of detail in the NPMPs across the country, with some plans being a lot more specific than others. This difference was often attributed to the style of individual planners and one interviewee recommended that there be more national guidance on the level of detail in plans to ensure consistency.

5.4 CONSULTATION PROCESS

While there was a consistent view that public involvement in plan development was important to give DOC a 'reality check', there was a view that, in practice, consultation often did not equate to the desired level of public involvement. Interviewees were asked to evaluate the consultation processes in which they had been involved. Aside from their views of the informal and formal consultation processes, interviewees commented on a number of other factors that influence the credibility and effectiveness of the consultation process.

5.4.1 Early consultation

A common ingredient for the success of any consultation process identified by most interviewees was that the process has a strong element of pre-consultation and that key groups are involved at an early stage. A number of interviewees gave examples where DOC had carried out extensive pre-consultation before developing a draft management plan. Stakeholders and DOC staff appeared to value the opportunity to discuss issues and developments at an early stage and prior to the formal planning process. This consultation provided an opportunity to brainstorm ideas, identify potential issues, address any concerns, and look for solutions before the formal process started. According to one DOC staff member:

These guys are a resource, they are in the area every day, they have a lot of information, and so it's important to get buy-in.

It was also suggested that making contact with stakeholders early in the process can help to build people's confidence to engage in the formal process of submissions and hearings.

One key ingredient for successful early consultation identified by interviewees was having the right people involved and 'shoulder tapping those key people in communities'. In some cases, DOC staff had invited representatives from national or regional interest groups to facilitate meetings and discussions; for example, the Tourism Industry Association (TIA), the Ministry of Tourism (MOT), and the Regional Tourism Organisation (RTO) were cited as having facilitated discussions between concessionaires and DOC staff. Some interviewees suggested that, as previous experiences may have made some people cynical or wary of getting involved in consultative processes, these independent representatives can motivate people to become involved.

Having a clear understanding of the purpose of early consultation was commented on by one interviewee who said that as he had spent 3–4 hours talking to DOC staff as part of the informal process, he had not put in a formal submission:

I was naive to assume that our conversations were de facto submissions. They should have told us [that they weren't] early in the process.

Some interviewees noted that it is also important to have the right people representing DOC in consultation processes:

Relationships are the most important thing. DOC needs to be very careful about who fronts things.

The consultation process should be run by people who are good at consulting and teasing out ideas ... plans can be written by others.

While most interviewees expected face-to-face consultation with DOC staff at the early stage of the consultation process, some noted that the focus of consultation was more important than the method. Many interviewees agreed that it was important to put boundaries around what was open to consultation and to highlight the key issues for discussion. Examples were given where DOC staff had gone to consult with communities without a clear purpose or framework for the discussion and had created confusion, misunderstanding, or anger:

At the consultation meeting [the staff member] raised ideas and it was unnerving, they were red flags ... if you give people a blank canvas their minds will go in all directions. DOC needed to distil some of the information they already had.

The provision of small fact sheets with summaries of the plan process and key issues was suggested as a useful resource to take to pre-consultation meetings.

Most of these meetings seemed to happen with individual stakeholders or with groups with the same interests. Some interviewees recommended this approach, as with a like-minded group there is less 'fighting' and more chance that a consensus can be reached. In one case, the DOC staff member worked with aircraft users alone and developed a policy with them as part of the pre-consultation process. The aircraft group then put in a submission of support for this policy.

In another case, an advisory group was formed, chaired by the RTO, to enable stakeholders to have an ongoing role in the planning process. A DOC staff member commented that this made the process more rigorous and helped to 'legitimise' decisions as a wider group (not just DOC) had been involved in decision making.

On the other hand, a number of interviewees suggested that there should be more opportunities for different stakeholders to work together and hear each others' views as part of the pre-consultation process. The management plan consultation process could become a forum for potential conflict between the interests of recreational and commercial groups who each get involved in order to safeguard and maximise their own opportunities and enjoyment of the park. A few interviewees argued that bringing groups together to discuss issues and problems provides an opportunity to create more integrated solutions for park management:

For [the NPMP] there were individual stakeholder meetings, but there could also have been some targeted group workshops, as well as public meetings.

It can be good to hear other perspectives, especially for integrated planning ... not separate people into different interest groups.

We need to pick a cross section of four or five people and ask—are we going in the right direction? We should bring groups together to see opposing views in the same room. I don't like the process of seeing groups separately; it shows a lack of chairing skills.

One interviewee commented that another benefit of mixing groups and interests is that, in hearing opposing or other views, people gain a better understanding of the challenging task involved in addressing different views within the plan.

Many stakeholders were aware of cases where there had not been any consultation prior to a draft plan being notified. Examples were provided of cases where stakeholders found out about a draft plan once it was notified in the newspaper, or where a Conservation Board was not consulted on a draft plan before it was notified. On the other hand, an example was given where an interest group declined DOC's offer of informal consultation and instead, to quote one interviewee, 'came down like a ton of bricks' in the formal submission process. However, most interviewees valued this early stage of consultation and requested that DOC give them enough notice to enable them to engage in the process.

5.4.2 Writing submissions

Once a draft plan has been notified, the public are invited to make written submissions. As mentioned previously, many of the stakeholders interviewed have extensive experience in preparing submissions and understood the formal process. There was wide consensus that people needed to have skills and experience in writing submissions, and also the time to read the draft plan and research and prepare a submission, and that it would be difficult for 'people off the street' to engage in this process.

There was general consensus that consultation processes were easier to engage with when participants had an understanding of government planning processes and plans, had experience in preparing detailed submissions, and had the time to engage in the process. In the case of one recreational stakeholder interviewed, a national representative with extensive submission experience would often write the submission on behalf of its membership.

As noted in Section 5.1, a number of interviewees discussed how difficult it would be to get involved if a person did not understand how DOC's statutory documents fitted together, did not have experience in preparing well-written, detailed submissions, and did not have time to read the large plans and prepare a submission. To help with the process, many interviewees recommended that DOC prepare a summary document showing the proposed changes from the previous plan:

I was not aware of the previous plan but hunted it out. I wanted to see the changes from the previous plan but they were so different that I could not see the changes easily. It would be really good if DOC could have prepared a changes document.

In addition, an interviewee commented that even if a person does not have a chance to look at the previous plan, such a document would immediately focus attention on how and why DOC is proposing to make changes to the management

of the park. The practice of providing information to the public in support of the management planning process varies between conservancies. In one case study, a DOC staff member outlined how they carried out this task:

Once the draft plan is notified we do an analysis of what has changed since the previous plan ... so people don't need to look at the whole document ... we produce a summary of what's changed.

5.4.3 Hearing

Interviewees who presented their submission to a panel in a formal hearing commented on the manner in which the hearings were conducted and their experiences of the process. There appeared to be some confusion about whether a submitter could only read their submission or whether it could be used as a forum for wider discussion:

A lot of submitters regurgitate what is in their submission rather than use [the hearing] as an opportunity to build on it. But it's pretty hard for them, especially if they're not experienced in attending such things. People are not sure whether it is a forum for discussion or not.

People did not know what to expect when coming into a hearing, they found it intimidating and frightening. You could give people an idea about what to expect—something explaining what will happen in the hearing process, and who'll be on the panel.

Satisfaction with their experience of attending a hearing varied amongst interviewees. Some stakeholders interviewed said that hearings went well, while some commented that the hearings process was 'intimidating' or 'one-sided', with no opportunity for discussion or debate:

When you present your submission it's quite intimidating. You are by yourself and it feels like you are on trial. If they did it more in a circle ... It's that whole 'them and us' but it's not 'them and us', we are 'them', it's all our money, our parks, our places.

Went to hearing, which was very unnatural for me. I thought it went well and would do it again. I could add a couple more points at the hearing.

5.4.4 Feedback

A common theme across many of the interviews was the need for written feedback as part of the formal consultation process. Some stakeholders commented that it took a lot of time and resources to prepare and present an effective submission and they would appreciate feedback. The pre-consultation process provides a forum for discussion and collaboration, but once the process enters the formal stage the submitter is often excluded from discussions and often does not appear to receive any feedback or information about the decision-making process. One staff member interviewed commented that there is no guidance in the legislation for feedback.

A number of interviewees commented that it was important to provide feedback in order to create understanding and buy-in to the process:

DOC needs to let people know how their submission contributed to the process in order to create shared ownership.

It would be fantastic to get feedback from DOC representatives on why something is good or not good. And then to also get feedback on what was

accepted and changed ... When DOC decision-makers make decisions, you get letter only stating that plan is approved and here is where you get a copy.

I would like to see all the feedback. It doesn't need to be posted, but could go up on the Internet, and people could be told where the information is.

I'm positive about the running of the hearing but disappointed to see we haven't received an outcome yet (that's slack) or that we haven't even been told what's going on (that's slack and disrespectful). It's all about relationships.

It's a big ask of people—to come to meetings, write submissions, attend hearings—need to give them feedback on where things are at and also how their submission was used.

We [DOC] should provide some feedback, [it must be] disheartening. Some people prepared very detailed submissions (108 points from one) so put a lot of time and effort into it and we have not updated them!

It's imperative we have a public process that's transparent and influences.

If DOC wants people to submit again, let them know how their submission contributed.

There was a view that if the rationale for why a decision had been made was communicated, the public may be more accepting of the decision. As there is no right of appeal once a draft plan has been prepared, it is important that feedback is provided to submitters to try and bring people on board, communicate the rationale behind the decisions, and create shared ownership. Without any feedback, people can become wary about the process:

There is not much evidence that DOC takes notice of submissions—they are seen as a waste of time.

In one case study, the DOC planner aimed to ensure that submitters received feedback at the time the plan was submitted to the Conservation Board:

When we send feedback to the public it will clearly state the response to each point including where things are outside scope and what's been done with those issues.

That planner maintained a detailed record of how decisions were reached which, in their view, made the process very transparent.

One interviewee recommended that DOC should follow another planning process where submitters are informed of the proposed decision before they attend a hearing and can then challenge and discuss it before a final decision is made.

Updating submitters was another topic raised as part of concerns about feedback, particularly given the length of time it takes for a plan to be finalised. Many interviewees were concerned about the delays and also the lack of any communication from DOC updating them on the process and letting them know what was happening:

One problem is that it has all taken so long. We are still waiting. People had an acknowledgement letter back in July or October but nothing since. We have had nothing in the media about it since and no updates from DOC.

My only criticism is since the hearing—there has been zilch, nothing. What are DOC doing? What is going on? A letter—it's so little but would achieve so much in public relations.

People roll their eyes. It's a longer process than people in the real world are used to dealing with.

The biggest problem for the Department is this time gap ... way, way too long.

It would be nice to have had an interim letter by now—everyone can accept delays but it would be nice to know and to get a revised date. It just needs to be a form letter.

The Internet was frequently suggested as a place to provide up-to-date information on progress of the plan review.

5.4.5 Decision-making

In general, there appeared to be a need for greater clarity around who would make the final decisions and sign-off on an NPMP, and the role of consultation in this process. Some interviewees commented on the role of conservation boards, while a few commented on the right of appeal, and inconsistencies between DOC conservancies and National Office and the NZCA. A few interviewees were concerned that when public consultation processes reach public consensus, these should then be binding on the decision makers:

The DOC decision-maker seems to have a large amount of discretion on what is considered. Public involvement can be a charade.

One area of the decision-making process that was of concern to several conservation board representatives was the varied nature of the boards' involvement in developing NPMPs. In some areas, board members are actively involved in the pre-consultation, submissions, and hearing process, while in others, they are kept at a distance. According to one board member interviewed:

The Department needs to pay more than lip service to the board and get them on board right from the beginning so things can be worked through before they become an issue. Some boards are more active and want a greater role—it totally depends on skills and interest of the board. With one plan, the Board has been kept at arms length at the early stage of the plan, despite jumping up and down.

However, another board member commented:

The Conservation Board is always part of consultative meetings with stakeholder groups. We go along, engage, bear, understand.

Board members interviewed generally favoured a more collaborative approach where members had greater buy-in to the decisions being made.

The right of appeal was another component of decision-making that received some comment. Several stakeholder interviewees were concerned that there was no right of appeal once the decisions had been made and there was no access to the conservation board or NZCA after the hearing. The need for an open, democratic process was strongly emphasised by some stakeholders, and a suggestion was made that an appeal could happen before a draft plan was sent to the NZCA. Some interviewees believed it was too late to make changes once

it had reached the NZCA, and this has the potential to undermine and destabilise the consultation process and trust between DOC and the community:

In an ideal world there should be opportunity for right of appeal for the draft plan, perhaps after it's gone to the Conservation Board and before going to the NZCA. If there is one point that people really don't agree with, then they can appeal. This links in with people getting feedback.

One concern about the NPMP review process raised by a few interviewees was that decisions made by conservancies in consultation with local communities could be significantly amended without any need for further consultation with the local communities. There appeared to be differing perspectives amongst DOC staff about how binding consensus reached during the consultation process is, as shown by the following comments from staff from different conservancies:

I developed good policy with them [user group] but made it clear that this would still be tested through the public process.

Have statutory process but adding the advisory group made it a more rigorous process ... so had this group, people in the industry making decision. Created 'legitimisation' of decisions. These people made the decisions.

5.5 RESOURCES AND CAPACITY

Interviewees were asked to comment on whether DOC and stakeholders have the resources and capacity necessary to effectively engage in a consultation process. Most of the comments made by interviewees focused on DOC's capacity and capability.

In terms of community stakeholders, as previously discussed, many of the stakeholders interviewed for this research consider themselves to have the skills and resources to engage in the process. It was suggested that smaller community groups, some iwi/hapū or new and emerging stakeholders may not have the knowledge or capacity to handle the complexities of DOC's policy and planning processes. As suggested by some interviewees, face-to-face informal consultation, fact sheets on NPMP issues, information about the submission and hearing process, and documentation of changes since the last plan would all assist in building knowledge and skills.

In relation to DOC's resources and capacity, many interviewees expressed frustration with the lengthy timeframes and delays and thought that they were due to a lack of staff to complete the work. Difficulty recruiting planners, combined with high staff turnover and a perceived low priority put on NPMPs, were common reasons given for a lack of momentum and progress in plan development:

DOC doesn't resource it. I hate to think how many planners they had through this period. Planners are trying to do the plan as well as rest of their work.

There is a serious lack of continuity as people who start the process don't see it through. This has the potential to create serious problems for DOC and CB. It began in year one and it's now year nine.

DOC never seems to have enough staff. The process falls over by delay. We should have finished 12 months ago. Because it takes so long the people who wrote submissions are heartily fed up with it.

Where planners were the only staff working on NPMPs, there were some concerns that they may become isolated or take ownership of the document and this made it difficult to undertake an open collaborative consultation process:

This is a problem for the Department; every park plan is a planner's personal published thing that they take ownership of.

Need a good team. It's difficult with one person. It's their baby. Difficult to accept criticism.

A number of examples were provided where DOC staff worked as a team on an NPMP with less personal ownership of the document. As noted earlier, it was also suggested that the planner is not always the best person to lead and facilitate a consultation process and a team-based approach meant that someone with facilitation and community engagement skills can lead that part of the project:

DOC is historically lacking in people management skills. People at management level have often come up through the ranks and DOC hasn't paid enough attention to training for these people to develop public consultation skills, and it is a skill. Some come across very badly in the public meetings.

5.6 REPRESENTATION

Interviewees were asked to comment on whether the breadth of public representation in the review was adequate⁹. There was a common view that NPMP consultation could best be described as stakeholder consultation, rather than general public consultation. A number of the stakeholder interviewees commented that DOC could spend a lot of time and resources contacting groups and individuals who may not necessarily be interested in the process:

It is a balance between doing nothing and going full on.

We [DOC] can beat ourselves up about how we get more people to get engaged.

I'm less than convinced that there is an appetite for many more people to be engaged. It sits down the scale from public involvement in the local hospital or school closing.

In the outdoors you see few low income, less educated people, or other [i.e. minority] ethnic groups. It is white middle class New Zealand using conservation land. Those who don't use it might value it but don't have the knowledge [about an area or plan] to submit. Submissions need to be very specific and detailed—the park plan process is really targeted at those who know and use the area.

It's [public input] really about two things ... one, it's about getting people involved in the front and back country, and two, it's also about getting people involved in management. You need to get them using before can get

⁹ Interviewees did not necessarily know who had been involved in the review process, and therefore what its breadth was.