



tourism
INDUSTRY
ASSOCIATION NEW ZEALAND

Proposed New Zealand Coastal Policy Statement 2008

7 May 2008

Introduction

1. This submission is from the Tourism Industry Association New Zealand (TIA), located in Wellington. If you wish to contact us regarding this submission, in the first instance, please telephone either Geoff Ensor, Sector Manager on 04 496 4889 or 0272 430 800 and e-mail geoff.ensor@tianza.org.nz or Simon Wallace, Policy Manager on 04 494 1842 or 0272 489 375 or e-mail him at simon.wallace@tianza.org.nz
2. TIA is grateful for the opportunity from the Department of Conservation (DOC or “the Department”) to make this submission. Many tourism businesses operate on and around New Zealand’s coastline, so they have a shared interest along with DOC, and local and regional councils, to make sure that proposed changes not only protect their businesses but also the environment in which they operate.
3. The New Zealand Tourism Strategy 2015 (NZTS2015), released in November 2007, places a strong emphasis on the environment. The Strategy has a particular emphasis on a good working relationship between DOC and the tourism industry.
4. A founding principle of NZTS2015 is “kaitiakitanga” which says “the guardianship and sustainable management of natural, built and cultural resources for the collective benefit of current and future generations”.¹ The proposed New Zealand Coastal Policy Statement (NZCPS) appears to embrace this principle.
5. This paper briefly outlines the role and functions of TIA, describes the common links between conservation and tourism and then describes the main issues arising for tourism operators from the NZCPS. The issues raised are not necessarily exclusive, and given the diversity of TIA’s membership, some areas in the consultation document that could impact on Members, may not have been commented on. For this reason, the Association recommends the submission be considered alongside those you may have received from other tourism organisations.
6. TIA indicates its preference to appear before the Board of Inquiry when oral submissions are held in June and July 2008.

Background

About the Tourism Industry Association New Zealand (TIA)

7. TIA is the umbrella organisation and peak body that represents and advocates for the interests of the tourism industry in New Zealand. The businesses we represent generate more than 85% of New Zealand’s

¹ New Zealand Tourism Strategy 2015, p.5.

tourism-related revenue. Tourism is an \$18.6 billion industry (\$8.3b from international and \$10.3b from domestic tourism) with international tourist expenditure accounting for 19.2% of New Zealand's total export earning and a further \$5.8 billion value-added spend in industries that support tourism.²

8. The tourism sector directly and indirectly, employs one in ten New Zealanders in a diverse range of businesses – the majority of which are small and medium sized enterprises with less than five people. Not only is tourism important because of its size, representing 8.9% of New Zealand's GDP, it is:
 - Highly employment intensive;
 - Regionally disparate; and
 - Very diverse - ranging from large stock exchange listed companies to small cottage industries.
9. The above businesses cover a range of tourism-related activities – hospitality, transport, adventure and activities, attractions and retail, as well as related tourism services. In many cases, regional tourism businesses have developed around regional assets divested by other industries and have revitalised those assets and the communities that depend on them.

Conservation and Tourism

“...enjoying public conservation lands and waters is a popular activity for many New Zealanders and overseas visitors, and outdoor recreation is often perceived by many to be central to our identity and way of life...”²

10. The tourism industry supports balanced conservation management policies that sustain economic development, provide a social return for New Zealanders and allow memorable visitor experiences to be delivered. Sustainable tourism businesses that provide a high quality product are dependant on a collaborative working relationship with the Department. TIA supports the strong environmental focus of its Members who operate concessions on public conservation land. Their businesses and livelihoods depend and rely on the way they use and care for the natural surroundings and in this regard, the Association strongly believes managed visitors are the most responsible users of the public conservation estate.
11. New Zealand's environment and scenery is a major draw card for overseas visitors forming the basis of the “100% pure” marketing brand, which underpins the country's gross domestic product (GDP) and

² “Key Tourism Statistics – July 2007”, Ministry of Tourism website

economic growth. The land, sea and air operators that ply the national parks and public estates ensure domestic and international visitors are able to enjoy New Zealand's natural environment and it is essential that this access is continued. Tourism businesses also invest and develop public amenities and infrastructure that improve the quality of the visitor experience.

12. TIA supports the following principles for conservation management:

- a) policies that sustain economic development and tourism businesses while protecting the environment in which they operate;
- b) legislation interpreted and applied in a way that leads to the achievement of a mutual relationship between use and conservation;
- c) lands that provide an economic and social return to New Zealand in a way that is consistent with the values that New Zealanders place on them;
- d) a fair rate paid by concessionaires for use of public lands to run their businesses in return for a fair consultative process in the management of that land;
- e) meeting visitor expectations of excellence by insisting concession holders meet quality industry standards;
- f) ongoing and robust review of DOC's research priorities and capabilities so future decisions are always made on a sound evidence basis;
- g) policies that are cognisant of the variety of effects imposed by each user group and the nature of benefits they receive from this use; and
- h) consistent New Zealand wide conservation management policies and standard operating procedures that acknowledge locally justified variations.

13. It is acknowledged that visitor numbers are growing and increasing the pressure on the natural resources and infrastructure of New Zealand's national parks and public lands. For this reason, TIA believes it is vital that the Department continues to work closely with the tourism sector to effectively manage this growth. In many cases we believe the issue is one of under-management rather than overcrowding – prescriptive limits are one tool, but a stronger more effective one is collaborative management that seeks operational and facility based solutions. In this way a park's visitor-carrying capacity can be increased to meet demand without increasing social or environmental impact.

14. TIA believes that mutual acceptance of the above principles lays the foundation for a sound and effective working relationship with the Department, based on a “no-surprises”, consultative approach to the management of issues as they arise, as well as encouraging free and frank discussion. It is essential that conservation management strategies or plans are disseminated appropriately, at a national level, and are consistent with legislative criteria.

Comment

15. The Association supports in principle the NZCPS and believes the work is timely given that a previous review has not been conducted since 1994. TIA is mostly supportive of the ten objectives set out in the Policy Statement. As part of the review process, it will be essential that the right balance is struck between the use, development and protection of the coastal environment.

16. At a general level, the NZCPS appears to place a heavy burden on local government to implement the policies which is likely to result in costly compliance issues for councils and communities who may need to amend District Plans. At the same time, there is an absence of any monitoring framework or monitoring regime, as well as a lack of context regarding connections to related legislation and national strategies.

17. At a tourism industry level, operators will be keen to ensure their businesses are neither hindered nor disadvantaged by the review of the NZCPS. There are potential implications for a range of tourism operators in this review with the businesses likely to fall into three key sectors, transport, accommodation and activities. For instance, some of the matters addressed include vehicle use on beaches, protection of marine species such as Hector and Maui dolphins, and protection of surf breaks.

18. On the specific policies in the NZCPS, TIA is able to make the following comments:

General

Policies 1 to 13

Policy 1 – The coastal environment

19. While Policy 1 gives some guidance to what the coastal environment includes, it would assist tourism operators if it defined the geographical limits of the coastal marine area (a), as well as providing more specific information about which areas (b to f) this includes. The policy would also have more value if the objectives for defining the coastal environment were outlined.

Policy 5 – Precautionary approach

20. TIA supports this policy as it is relevant for those tourism operators thinking of new activities in the coastal environment, especially activities where there is uncertainty about the effects associated with them. However, the following wording changes are recommended “.....but whose effects are potentially significantly adverse *to any component of sustainability* to that environment.....”

Policy 9 – Bio-security

21. Potentially this policy has major implications for marine based tourism operators, especially the growing number of cruise ships that are now visiting New Zealand ports in the peak summer months. Clarification is sought as what this will mean for councils who will be required to be more vigilant about bio-security issues. For instance, if in practice this means cruise passengers will need to be screened on arrival at every port in New Zealand, then clearly local and regional councils will have neither the infrastructure nor personnel to implement this. Central government investment may well be required if monitoring for bio-security risks is to be effective.

Policy 11 – Monitoring of the NZCPS

22. While supporting this policy in principle, TIA believes that the district and regional monitoring outlined in 11(b) has the potential to become expensive and burdensome on local government resources. TIA wishes to signal that any monitoring regimes must be simple and cheap to administer so that councils are not subjected more strains on their already stretched resources.

Subdivision, Use and Development

Policies 14 to 29

Policy 14 to 16 – Location and form of subdivision and development and use and development of the coastal marine area

23. Policies 14, 15 and 16 would appear to have implications for tourism operators especially with regard to the use of the coastal environment and the activities that can take place there. The Association would be concerned if there were moves to limit responsible vehicle use, such as the operations of four wheel drive or all terrain vehicles that provide excursions along some of New Zealand’s coasts. At the same time, TIA believes strong moves should be made to limit and/or prosecute vehicle use on beaches where it is dangerous to both people and the environment.

24. TIA recommends an extra bullet point be inserted after “in identifying these areas, while giving effect to this policy statement as a whole, local authorities shall” and read:

Consider the visual impact of subdivision, use or other developments and how it may add or detract from the established character and aesthetic value of the area.

Policy 20 – Surf Breaks of National Significance

25. The recognition of nationally significant recreational areas for surfers is supported by TIA. The NZCPS lists the following areas as surf breaks of national significance:

- Ahipara, Northland,
- Raglan, Waikato,
- Stent Road, Taranaki,
- White Rock, Wairarapa,
- Mangamaunu, Kaikoura,
- Papatowai, Southland

TIA recommends the Board consult with Surfing New Zealand, the industry body representing surfers in New Zealand, to make sure the appropriate surf break areas have been included and whether any others should be added.

Policy 21 – Cumulative effects

26. TIA strongly supports this policy.

Policy 22 – Precedent effects

27. TIA strongly supports this policy.

Policy 25 – Public or multiple uses of structures in the coastal marine area

28. The unnecessary proliferation of structures in the coastal marine area is supported by TIA, however, more certainty is needed about what is reasonable and practicable, particularly if the intention of this policy means privately constructed structures are to be made accessible to the public.

Natural Character

Policies 30 to 38

29. While broadly supporting these policies, clarification is needed as to what scale activities can occur in the coastal environment.

30. TIA questions the need for Policy 33 which appears to have been addressed in Policy 14, while Policy 34 appears to have also been

addressed in part by Policies 2,14,21,22 and 32. Similarly, Policy 36 has been previously covered by other policies.

Public Access

Policies 39 to 43

31. The Association supports the stronger emphasis in the NZCPS towards public access. As the Board of Inquiry will be aware, the government completed a review of walking access in 2007 following extensive public consultation. TIA made a submission to this review in which it emphasized the need for local decisions and solutions regarding walking access. The Association said local government should be working with communities and landowners to make sure walking access is maintained and/or developed. It is important, therefore, that the NZCPS be careful not to set national precedents when local solutions and decisions are more likely to work.

Policy 42 – Vehicle Access

32. TIA supports this policy particularly with regard to protecting public safety (a) and protecting the dunes, estuaries and other sensitive natural areas or habitats (d). However, this should not exclude responsible tourism operators from continuing to use the coastal environment to operate trips for visitors along the beaches and adjacent public land.

Water Quality

Policies 44 to 50

33. TIA supports all but Policy 50 with regard to ports and other marine facilities. The requirement for ports, marinas and other relevant marine facilities to provide sewage and waste collection facilities for vessels may incur costs for marine based tourism operators. If this is the case, then consultation with the tourism industry will be necessary.

Coastal Hazards

Policies 51 to 54

34. These policies are supported by TIA

Historic Heritage

Policies 55 to 57

35. These policies are supported by TIA

Conclusion

36. In sum, TIA is generally supportive of the objectives and policies set out in the NZCPS. The review, however, does appear to place a large onus

on local councils to implement the policies, without providing them with any extra funding or resource to do so. The directions around the policies relating to bio-security and water quality potentially have cost implications for tourism operators which would require consultation with the industry. Finally, TIA would want to ensure that the NZCPS does not adversely impact on the operations of tourism businesses.

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