

Regulatory Impact Statement: Policies for the first National Conservation Policy Statement

Decision sought	Cabinet agreement to policy proposals for the first National Conservation Policy Statement.
Agency responsible	Department of Conservation
Proposing Ministers	Hon Tama Potaka, Minister of Conservation
Date finalised	4 March 2026

Description

This Regulatory Impact Statement (RIS) focusses on key proposed policies for inclusion in the first National Conservation Policy Statement (**NCPS**).

The proposals build on decisions made by Cabinet in June 2025 to reform conservation land management, including to establish the NCPS¹. The aim of the wider reforms is to speed up concessions² processing and unlock greater economic activity on public conservation land (PCL) where effects can be managed, while protecting natural and historic resources.

The changes agreed by Cabinet in June [CAB-25-MIN-0213.01 refers] include:

- replacing the Conservation General Policy and General Policy for National Parks with a single NCPS (which will be secondary legislation);
- replacing conservation management strategies, national park management plans and conservation management plans with a single layer of areas plans;
- faster processing of concessions through more simplification and standardisation, with classes of concession activities able to be pre-approved for a concession or exempt from the need for permission.

Cabinet invited the Minister of Conservation (the Minister) to report back on policies for the NCPS to unlock economic activity, while protecting natural and historic resources.

This RIS covers four proposals for the NCPS that support Cabinet's objective:

- Guidance to focus area plans on information that directs regulatory decisions;
- Specifying a list of low-impact activities that will be exempt from or pre-approved for a concession;
- Designating conservation areas in terms of 'visitor zones' and providing guidance on where activities are more likely to be acceptable based on visitor zones and land classifications;

¹ [Cabinet material: Modernising conservation land management.](#)

² A concession is a lease, licence, permit or easement, granted under Part 3B of the Conservation Act 1987 and includes any activities authorised by the concession document (section 2, Conservation Act 1987).

- Clarifying the approach to phasing out private accommodation on PCL (a discrete issue that affects a small group of people with concessions for long-held private accommodation).

Summary: Problem definition and options

What is the policy problem?

Cabinet has agreed that the NCPS will specify the content of area plans (i.e. set the template). Under the current system, plans are long, impenetrable, and establish rules and policies inconsistently. Plans sometimes duplicate legislative provisions, prescribe limits on activities without clear rationale, and often include long stocktakes of values that are hard to navigate and not structured well to inform regulatory decisions such as whether to grant a concession.

Cabinet has agreed that the NCPS will specify activities that are able to be pre-approved or exempt from the need for permission. There are a range of low impact activities that are routinely approved for concessions on PCL, but the Conservation Act still requires case by case assessment of each application, which is inefficient. Opportunities to improve the efficiency of concessions processing, including through pre-approved and exempt activities were assessed in the *RIS: Conservation Land Management Planning, 17 June 2025* (refer [Cabinet material: Modernising conservation land management](#), p 37–88).

There is an opportunity to standardise how recreation and tourism values are considered in decision making and to signal in advance where some key economic activities are more likely to be in line with those values, as well as the relevant land classification. There is also an opportunity to clarify the phase out requirement for existing private accommodation on PCL and provide more certainty for people who currently hold concessions for private accommodation.

What is the policy objective?

To speed up concessions processing and unlock greater economic activity on PCL where effects can be managed, while protecting natural and historic resources.

What policy options have been considered, including any alternatives to regulation?

This RIS assesses four proposals that contribute to the overarching problem definition, for inclusion in the first NCPS.

Proposal 1: Making area plans more focussed on information that directs regulatory decisions

- Option 1 – Status quo (No constraints on area plan content).
- Option 2 - Allow area-specific limit-setting policies.
- Option 3 – Do not allow area-specific limit-setting policies (***preferred option***).

Proposal 2: A set of low-impact activities for pre-approval and exemption

- Option 1: Status quo (no exempt or pre-approved activities included in the first NCPS).
- Option 2: The NCPS will include the specific set of activities detailed in Appendix 1 (***preferred option***).

Proposal 3: Guidance on where activities are more likely to be suitable based on land classifications and visitor zones

- Option 1: Status quo (no pre-assessment).
- Option 2: The NCPS will partially assess where certain activities are likely to be suitable across all conservation land - based on land classifications and visitor zones (**preferred option**).
- Option 3: The NCPS includes detailed criteria to guide where activities are more likely to be suitable. Operational policy could be used to provide more spatial information.

Proposal 4 - Clarifying the approach to private accommodation on PCL

- Option 1: Status quo (NCPS maintains current policy that all private accommodation must be phased out).
- Option 2: the NCPS will limit the ongoing use of private accommodation, including a term that must not exceed 30 years, with no right of renewal (**preferred option**).
- Option 3: the NCPS is silent on phase-out policy.

Non-regulatory options have been considered as part of proposals, where relevant. The Department of Conservation (DOC) is continuing to implement non-regulatory changes to speed-up the concession applications process, including new technology to support application processing, as well as new practices such as standardised conditions. However, there is a limit to the efficiencies that can be achieved through non-regulatory approaches.

The remainder of the NCPS comprises policies from the existing General Policies, with minor wording adjustments for readability. This 'lift and shift' will not generate new or additional regulatory impact and is out-of-scope for this RIS.

What consultation has been undertaken?

In August 2025, DOC undertook targeted consultation with key interested parties on some of the proposed policies for the NCPS. Due to the constrained timeframes for legislative development, feedback on the proposals was sought from key concessionaires and recreation groups, conservation boards, the New Zealand Conservation Authority, Treaty partners and environmental NGOs. Consultation took place from 24 July until 22 August 2025.

Is the preferred option in the Cabinet paper the same as preferred option in the RIS? Yes.

Summary: Minister's preferred option in the Cabinet paper

Costs (Core information)

There will be transition costs to implement these proposals, including costs for DOC to map visitor zones, costs associated with consultation with Iwi to inform conditions for pre-approved and exempt activities, and to set up systems to process pre-approved concessions. There will also be costs to prepare operational policy and to communicate the changes to organisations, communities, iwi/hapū and businesses. We do not have cost estimates for the mapping process, but the estimated total cost for DOC to prepare an area plan is between \$381,500 - \$761,500. There should be no ongoing additional costs for organisations, communities, iwi/hapū and businesses compared to the status quo.

DOC will forgo approximately \$400k per annum in departmental revenue, due to the reduction or removal of concession processing fees across all the 16 pre-approved or exempt activities. However, DOC currently only recovers around 20-30% of costs from concessions processing, so the reduction in revenue will be closer to \$280k.

Benefits (Core information)

The primary monetised benefit is increased efficiency in concession application processing with the removal and reduced application/processing requirements for approximately 30-40 percent of concession applications through the exemption and pre-approval for low-impact activities. Removing or automating concessions processing for these 16 activities will free up time and resources to focus on processing more complex applications.

The clearer guidance and more streamlined concessions process will provide greater certainty for applicants on the types and locations for undertaking different activities and support faster concessions processing.

Balance of benefits and costs (Core information)

Does the RIS indicate that the benefits of the Minister's preferred option are likely to outweigh the costs?

The combination of preferred options described above will provide benefits over the status quo, including by providing faster decisions on concessions and more certainty about outcomes for concession applicants. This will reduce costs for both government and concession applicants and help enable economic activity where appropriate.

Implementation

The Bill will be ready for introduction to the House in April 2026. The first NCPS will come into effect as soon as possible following the passing of the Bill. DOC's Permissions team will be responsible for the implementation of the changes to concessions processes. There will be transitional work to map visitor zones in area plans, build new systems and supporting operational guidance for pre-approved activities, as well as communicating the changes with organisations, communities, iwi/hapū and businesses.

Monitoring and evaluation of each change will also be undertaken by DOC.

Limitations and Constraints on Analysis

This analysis is in the context of Cabinet's June 2025 policy decisions. The Minister of Conservation intends to introduce the Bill to the House in April 2026.

The tight legislative timeframe has meant that full public consultation on the proposed content has not occurred - only a targeted group of key stakeholders and iwi/hapū have been engaged with. However, the proposal document which is intended to support select committee consideration of the Bill offers the opportunity for the public to engage on the detail of the NCPS.

I have read the Regulatory Impact Statement and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the preferred option.

Responsible Manager(s) signature:

s9(2)(a)

4 March 2026

Sarah Reader
Policy Manager
Department of Conservation

Quality Assurance Statement

Reviewing Agency:

Department of Conservation
Ministry for the Environment

QA rating:

Partially Meets

Panel Comment:

A quality assurance panel with members from the Department of Conservation and Ministry for the Environment has reviewed the Regulatory Impact Statement. The panel considers that it partially meets the Quality Assurance criteria.

The panel acknowledges significant improvements on the first version have been made, with better structure, flow, and accessibility, but it still has sections that are not clear and concise. Concerns remain about the robustness and transparency of the analysis, including how options are rated and weighted, limited use of quantitative evidence, and an understrength Monitoring, Review and Evaluation section. The Panel considers the document likely meets the “complete” criteria given the explained scope constraints and Cabinet context, despite some areas where more detail would be desirable. Consultation is well described where it has occurred, but there has been little to no consultation on some proposals.

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

1. Economic activity on conservation land (which comprises nearly a third of New Zealand land) is regulated through two national-level policy instruments – the Conservation General Policy (CGP) and the General Policy for National Parks (GPNP) (the General Policies) – and these are underpinned by a hierarchy of regional, local, and place-specific statutory plans. Collectively, these documents guide decisions on ‘concessions’, which authorise a range of activities, from small one-off events to larger projects involving construction of visitor and tourism infrastructure.
2. The concessions system helps DOC ensure activities on and uses of PCL are compatible with the overriding purpose of conservation³, with most activities on PCL requiring a concession from the Minister of Conservation.⁴ The system helps ensure appropriate and suitable services and facilities are provided for visitors, and that enjoyment and recreation are not impacted by activities. There are four key functions of the concessions system in managing people’s use of PCL:
 - *Delivering effective land management:* The concessions system is responsible for ensuring any activities maintain the values of PCL. It enables DOC to control which activities can occur, assess any adverse effects, and apply any conditions necessary for activities to take place.
 - *Providing well-governed access opportunities:* Appropriate private use and development of PCL need an enabling mechanism. A clearly regulated environment gives legitimacy to that use, provides a reasonable level of certainty and clarifies responsibilities.
 - *Securing public benefit from private use and development:* A royalty is paid when the use of PCL results in commercial gain. DOC generally refers to these royalties as activity fees. Securing a fair return to the public for the use of a public asset is the basis for charging activity fees.
 - *Clarifying public and private entitlements and responsibilities:* A concession agreement clarifies entitlements and responsibilities for both parties in situations where both DOC and concessionaires have interests and duties relating to an activity.

Cabinet has agreed to a suite of changes to reform conservation land management

3. The two General Policies have not been substantially amended since they were made in 2005. There are over 100 statutory planning documents under these, around 80% of

³ The Conservation Act defines ‘conservation’ as preserving and protecting natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.

⁴ Exceptions to this rule include recreational activities without any specific gain/reward; activities carried out by the Minister of Conservation or DOC in exercising functions, duties or powers under any law; activities authorised by conservation legislation; and activities to save or protect life or health, to prevent serious damage to property, or to avoid actual or likely adverse effect on the environment.

which are outdated. Many plans are lengthy, restrict economic activities without clear reason (e.g. through various instructions across documents) and contain a range of content that does not necessarily direct decision-making (e.g. explanatory information provided with no clear purpose). Overlapping plans, or areas covered by more than one plan, can also cause difficulties when they do not take a consistent approach or have conflicting guidance.

4. Together, these issues create significant complexity for decision makers assessing concession applications and contribute to lengthy concession processing times, legal risk and inconsistent outcomes.
5. The concessions framework also does not allow for broadly similar concessions to be dealt with in a consistent way. The framework also provides little standardisation or guidance, including few statutory timeframe requirements. As a result, most applications get approached on a case-by-case basis and in bespoke ways which leads to lengthy processing times and uncertain outcomes for applicants.
6. This is compounded by operational issues, including capacity constraints within DOC, poor data to understand performance, technology constraints which require significant manual data entry, an operating model with distributed responsibilities and a risk-averse regulatory culture, which leans towards protection over proportionality.
7. In June 2025, Cabinet agreed to a suite of changes to reform conservation land management. The changes are intended to speed up regulatory decisions and unlock greater economic activity on conservation land where the risks are manageable.⁵
8. As part of these reforms, Cabinet agreed to:
 - replace the Conservation General Policy and General Policy for National Parks with a single NCPS (which will be secondary legislation);
 - replace conservation management strategies, national park management plans and conservation management plans with a single layer of area plans;
 - a number of changes to concessions settings to enable more simplification and standardisation, including new statutory timeframes for processing;
 - enable classes of concession activities to be pre-approved or exempt from the need for permission.
9. Drafting is underway on the Conservation Acts (Land Management and Other Matters) Amendment Bill (the Bill) to implement these changes and will be ready for introduction to the House in April 2026.
10. A broader analysis of issues with planning and concessions settings and issues being solved through the Bill rather than the NCPS, were comprehensively canvassed in the impact analysis to support the reforms: *RIS: Conservation Land Management Planning*, 17 June 2025 and *RIS: Concessions processing*, 17 June 2025.⁶

⁵

Cabinet CAB-25-MIN-0213.01, *Modernising Conservation Land Management: Policy Approvals*, 30 June 2025 ([Cabinet material: Modernising conservation land management](#), p 31–33).

⁶

[RIS: Targeted amendments to concessions processes - 11 November 2022 - Department of Conservation](#)). [Cabinet material: Modernising conservation land management](#).

11. A summary of the new streamlined planning system is provided at Appendix 1.

Cabinet decisions about the scope and purpose of the NCPS

The NCPS will specify the content of area plans

12. Cabinet agreed in June 2025 that the NCPS can direct the content of area plans. Cabinet agreed that the purpose of area plans is to implement the NCPS and to set, where necessary, objectives specific to the local context. Area plans can (within the bounds set by the NCPS) set place-based objectives and policies and include concise descriptions of core conservation values of places. Area plans cannot:

- Be inconsistent with the legislation or NCPS.
- Include actions or milestones.
- Duplicate the legislation or NCPS.
- Set limits based on the number of concessionaires that can operate within a limit.
- Affect agreements or contracts between the Crown and landowners (status quo for CMSs).

The NCPS will enable classes of activities to be pre-approved for or exempt from a concession

13. Cabinet agreed to enable the NCPS to specify classes of activities as exempt from a concession or pre-approved for a concession.
14. Activities classed as **exempt** will not need a concession. There will still be conditions on anyone undertaking the activity on PCL. For example, certain activities will not be exempted in some specific sites due to the potential effects of the activity on that site.
15. For activities classed as **pre-approved**, applicants can obtain a concession instantly by completing an online application. Effects assessment is undertaken in advance for these activities, and the online application process will enable the imposition of basic conditions, as well as collection of an activity fee (if required) from applicants.

Criteria for exempt and pre-approved activities

16. Cabinet has agreed that an activity can be pre-approved for or exempt from a concession if:
- the activity is not contrary to the provisions of the relevant Act(s) and the purpose for which the land is held, and
 - the activity does not require an interest in land (for example, it would not provide exclusive use or the ability to install a permanent structure)
 - the adverse effects of the activity (including cumulative effects) on the values and objectives of the relevant land classification can be reasonably and practicably avoided, managed or mitigated.
17. In meeting these criteria, the Minister will designate an activity pre-approved (rather than exempt) when:

- there is a need to actively monitor volumes and potential cumulative effects, or
 - where it is reasonable to continue to collect any fees, rents or royalties related to the activity.
18. The NCPS will also specify the locations where exempt or pre-approved activities can be undertaken. This includes the land classifications that the activity is suitable for and specific locations in each area where the activity cannot be undertaken (i.e. sites where it would have significant adverse effects on natural, cultural, or historic values present).
 19. For example, exempting or pre-approving an activity may be appropriate across almost all scenic reserves but not, for example, if a particular scenic reserve is home to a breeding colony of endangered albatross for which the activity would have significant impacts, or wāhi tapu and the impacts are inappropriate.
 20. Cabinet agreed that the Minister of Conservation can add or amend the list of exempt or pre-approved activities following a public consultation process to amend the NCPS. This process could take up to 6 months. However, if there are concerns about an activity and its impact in an area, the Director-General of Conservation or Minister of Conservation can, with public notification, immediately revoke an activity in a specified area for up to three months. Then the Minister can determine whether to remove or amend the activity in the NCPS.

The NCPS will clarify the approach to phasing out private accommodation on PCL

21. There are estimated to be several hundred private accommodation structures on PCL, ranging from small huts, to baches and primary residences, some forming small communities. Some structures have significant associated infrastructure, such as water and power supply, vehicle access, and sewerage systems. Others are basic shelters and may only be used on a temporary basis.
22. Private accommodation is generally not facilitated on conservation land. It is usually incompatible with the principles of public access, conservation protection, and the non-exclusive use of public resources. Though there are private benefits, there are little to no wider economic benefits.
23. The current Conservation General Policy and National Parks General Policy state that:
 - a. new private accommodation on conservation land should not be permitted; and
 - b. existing private accommodation on conservation land will be phased out, except where specifically provided for in other instruments.
24. The NCPS will maintain the current policy for new private accommodation on private land. It will also clarify the approach to phasing out current private accommodation.

What is the policy problem or opportunity?

Proposal 1: Making area plans more focussed on information that directs regulatory decisions

Streamlining the content of area plans

25. Planning documents are long, hard to navigate, and contain a range of content that does not necessarily direct decision-making. For example, plans sometimes duplicate legislative provisions or vary slightly from General Policies for no clear localised reason, or prescribe limits on activities without clear rationale, and include long stocktakes of values (biodiversity, historic, recreation, cultural), that are hard to navigate and not structured well to inform regulatory decisions like whether to grant a concession.
26. Cabinet agreed in June 2025 that area plans can (within the bounds set by the NCPS) set place-based objectives and policies and include concise descriptions of core conservation values of places. Area plans cannot:
 - Be inconsistent with the legislation or NCPS.
 - Include actions or milestones.
 - Duplicate the legislation or NCPS.
 - Set limits based on the number of concessionaires that can operate within a limit.
 - Affect agreements or contracts between the Crown and landowners (status quo for CMSs).
27. By constraining what content area plans can include through the NCPS, there is an opportunity to make area plans considerably more concise than current plans and ensure that content is focused on information that directs regulatory decision and informs plan users.

Clarifying the approach to setting localised limits and conditions on activities

28. As agreed by Cabinet in June 2025, the NCPS and area plans cannot “set limits based on the number of concessionaires that can operate within an area”. The intention of this change is to create a more enabling environment for economic development.
29. In line with Cabinet’s earlier decision, there is a further opportunity to clarify the extent to which area plans can set limits on activities, including the ability of area plans to set concession conditions. Limits and conditions are important tools for protecting conservation but can constrain appropriate economic activities.
30. Under the current system, area-specific limits and conditions are usually used in statutory documents to manage overcrowding or cumulative effects of activities. However, many activities with adverse effects are undertaken by both concessionaires and recreational users (e.g. guiding, vehicle use).
31. Area plans will not limit or impose conditions on activities that do not require an authorisation or booking (for example, recreational activities such as tramping or horse trekking in places where these are provided for recreationally). Plans are not secondary legislation and do not have the ability to regulate the public. Limits on activities that do not require an authorisation are better managed through bylaws and regulations rather

than area plans.

32. In addition, localised limits and conditions across area plans and secondary legislation can create complexities for applicants in understanding the rules that apply. Standardisation of limits and conditions will reduce inconsistency across documents and areas of the country, increasing certainty for applicants and improving conservation outcomes (through better management practices).

Proposal 2: A set of low-impact activities for pre-approval and exemption

33. There is an opportunity to improve the efficiency of the concessions process for all parties by exempting some activities from a concession and enabling some activities to be undertaken once a simple (e.g. online) permit has been obtained. This will remove low-complexity concession applications from the system, which currently need individual assessment and often involve long timeframes.

Proposal 3: Guidance on where activities are more likely to be suitable

34. One of the key tests when considering a concession application is whether the proposed activity is contrary to the purposes for which the land is held. This is determined by:
- how the land is classified (i.e. what type of protected area it is); and
 - the specific conservation values and objectives of the place.
35. Assessment against the land classification can vary from plan-to-plan and application-to-application. This means that this test may be applied differently for the same activity in different places.
36. There is an opportunity to standardise spatial planning of recreation and tourism values through ‘visitor zones’, which can signal in advance where some key economic activities are more likely to be in line with recreation and tourism values (as well as the relevant land classification). This would provide more certainty for potential applicants by indicating where it is likely activities will be approved and speed up application processing through standardising of concession processes.

Proposal 4: Clarifying the approach to phasing out private accommodation on PCL

37. The current General Policies require the phase-out of existing private accommodation on PCL, except where specifically provided for in other instruments. As part of the phase-out policy, the General Policies require structures that are no longer in private ownership to be removed or retained by DOC for public use.
38. Phase-out typically involves a concession term that demonstrably reduces the time for private accommodation and associated facilities to stay at the site (e.g. on the death of the owner or within 20 years), phase-in of public use after a specified period of time, and/or structure removal and rehabilitation of the site.
39. However, the policy does not specify a timeframe for phase-out and there is uncertainty about its application to structures with authorisations that pre-date conservation legislation (for example, where an authorisation is held that does not require phase-out (e.g. perpetual leases). There is also no flexibility for DOC regarding the removal or retention of structures. It is not always desirable or suitable to retain a structure for public use and, in some cases, removal of a structure may be more harmful to

conservation values than allowing a structure to remain.

40. There is a risk of a disproportionate management response, given the range of different structures and situations and a high likelihood of legal challenge where phase-out is applied to structures with authorisations that pre-date conservation legislation.

What objectives are sought in relation to the policy problem/opportunity?

41. There are five broad objectives for this work. These objectives are guided by Cabinet's objective in establishing the NCPS (i.e. to drive greater economic activity on PCL where effects can be managed, while protecting nature).
42. The objectives are also guided by the purpose of the concessions system outlined in Section 1 above (i.e. to ensure that any activities undertaken on PCL support its values and provide a fair return to the public for its use).

Effectiveness	Clear and consistent national direction and guidance will support delivery of positive outcomes for conservation and unlock economic activity on PCL, where appropriate.
Efficiency	Greater system efficiency will produce direct economic benefits for businesses and communities (more timely and cost-efficient concessions processes) and improved assessment of conservation outcomes arising from activities (with more capacity in the concessions system with low-impact activities and streamlining activities 'pre-assessment' and visitor zones).
Good regulatory practice	The concessions system is largely managed through primary legislative provisions and internal operational processes (not regulation), and good regulatory practice can ensure clarity and greater certainty for DOC (the regulator) and regulated parties. It also includes ensuring DOC has the necessary tools, functions, powers and levels of discretion/flexibility to satisfactorily perform its statutory duties.
Successful implementation of any changes	Ensuring the benefits of clearer and more consistent national policy direction successfully flow through to DOC's day-to-day work and interactions with regulated parties across the concessions system. Poor implementation of any changes could mean that the intended benefits are not able to be realised.
Upholding Treaty obligations	DOC is legally required to interpret and administer the Conservation Act in a way that gives effect to the principles of the Treaty of Waitangi. The new system must also ensure any changes or new arrangements uphold Treaty settlement commitments and other Treaty obligations (e.g. those in relationship agreements between DOC and iwi/hapū).

What consultation has been undertaken?

43. The high level purpose and scope of the NCPS was canvassed in the public consultation document '[Modernising Conservation Land Management – Proposal document](#)' (see Section 5). Public consultation was from 15 November 2024 until 28 February 2025. An analysis of public submissions is available on DOC's website: [Summary of submissions: Modernising conservation land management](#).

44. On 24 July 2025, DOC released a consultation paper on the design of the NCPS, seeking feedback on policy matters from a targeted group of key stakeholders, and iwi. Hui with iwi on the design and key elements of the new NCPS were also held. Feedback was completed on 22 August 2025, with 57 stakeholders making submissions (including 31 iwi, hapū or iwi-controlled organisations).
45. The proposed approach to private accommodation and the more detailed guidance on where activities may be suitable for a concession were not included in the targeted consultation, as analysis of those proposals was still at an early stage when consultation commenced.
46. There was a lot of feedback about the insufficient time for consultation as well as the limited detail on some of the NCPS proposals. DOC will publish proposals for the NCPS to support select committee consideration of the Conservation Acts (Land Management and Other Matters) Amendment Bill. This will enable stakeholders, iwi and the general public to engage on the detailed content of the NCPS.

Feedback from targeted consultation

47. Broadly, stakeholders were supportive of the proposals, including using pre-approvals and exemptions to manage low-impact activities. Most submitters acknowledged that the current conservation system is not fit-for-purpose and generally support the NCPS's aim to simplify and streamline it.
48. Several submitters were concerned that the proposed NCPS places too much emphasis on economic growth and tourism, potentially at the expense of conservation and biodiversity outcomes. Some submitters, including the Environmental Defence Society (EDS), felt that the proposed NCPS could better align with the purpose of the Conservation Act 1987 by ensuring that conservation values are prioritised.
49. There were a range of views expressed around the detail of the proposals. Many stakeholders – especially iwi and hapū – were concerned about the impact of the proposals on mana whenua, including a concern that streamlining area plan content will limit the ability of iwi and hapū to influence management of conservation land.

Content of area plans

50. There were mixed views on the proposed content for area plans; some supported simplified area plans and felt that this would increase efficiency while others were concerned that this could result in plans overlooking local contexts and disrupting existing work. Note that the proposal document did not include the proposal to remove the ability for area plans to set limits.
51. Some comments also suggested a misunderstanding of the proposals. For example, many iwi were concerned that the proposals did not reflect their Treaty Settlements when these aspects are still to be worked through in consultation. DOC are continuing to engage directly with iwi on these matters.
52. Many stakeholders agree that values and objectives within area plans should be clearly communicated using concise, plain language and for objectives to be measurable, outcomes-focused, and accessible to a broad audience. The NCPS outlines what value types can be included in area plans. Operational policy will be necessary to ensure conciseness of objectives and ensuring they are outcomes-focussed.

Pre-approved and exempt activities

53. There was broad support for exempt/pre-approved activities, though many submitters raised concerns that “low impact” activities may still have cumulative environmental impacts. These concerns are addressed through the terms and conditions for these activities and ensuring that they only occur on land that is classified as suitable for those types of activities and will be subject to any limits imposed through bylaws/regulations. In addition, if there are concerns about an activity and its impact in an area, the Director-General of Conservation or Minister of Conservation can, with public notification, immediately revoke an activity in a specified area for up to three months. Then the Minister can determine whether to remove or amend the activity in the NCPS (or relevant area plan).

Guidance on where activities may be suitable for a concession

54. The proposal document introduced a proposal to establish “visitor zones” to standardise the assessment of the effects of activities on recreation and tourism. The document also proposed to pre-assess some activities against visitor zones and land classifications to standardise and front load that part of the application process.
55. Many submitters acknowledged the potential benefits of the proposed visitor zones, particularly for improving efficiency and streamlining decision-making. Concerns were raised that the proposed pre-assessment of activities could reduce local decision-making in favour of efficiency. Some submissions reflected a misunderstanding, for example that pre-assessment did not leave scope for DOC to decline an application or put conditions on an activity where appropriate.
56. The policy is now more clearly outlined: pre-assessment is not a guarantee of approval and only provides guidance of the likelihood of approval for an activity. DOC is still able to decline ‘green’ applications in appropriate circumstances or impose conditions to mitigate any negative impacts of an activity.
57. Further analysis also resulted in a reduction in the number of visitor zones from seven down to five, and the removal of some activities from the ‘pre-assessed’ list (e.g. aircraft activities).

Section 2: Assessing options to address the policy problem

What criteria will be used to compare options to the status quo?

58. Options for change will be compared to the status quo using the criteria outlined below.
59. The criteria directly relate to each objective outlined above.

Conservation and other interests	• First order: contribution to conservation outcomes, including ensuring that conservation values and the effects of an activity are well managed through the concession process. • Second order: contribution to other outcomes in section 6 of the Conservation Act 1987 (fostering recreation, and allowing for tourism). • Contribution to other economic opportunities.⁷
Regulatory practice	• Clarity for regulated parties about activities. • Certainty for regulated parties about activities and for the regulator in making concession decisions.
Government costs and efficiencies	• Faster and more consistent decision-making in relation to ‘concession applications’ (determining the types of tourism, recreational and economic activities that can occur on public conservation lands).
Successful implementation	• Feasibility of the proposals operationally. • Ease of implementation, including time and costs.
Upholding Treaty obligations	• Consistency with Treaty settlement commitments and other obligations. • Support statutory functions to be carried out in a manner that gives effect to Treaty principles, consistent with section 4 of the Conservation Act 1987.

60. In evaluating options in this RIS, the contribution to conservation outcomes is weighted more heavily than contribution to other outcomes. This reflects the overarching purpose of the conservation regulatory system (see s.6, Conservation Act 1987⁸).
61. A number of existing Treaty settlements provide for specific input and procedures for conservation planning at-place; the RIS evaluation assumes that existing Treaty settlements and the intent of redress commitments will be upheld.

What scope will options be considered within?

62. As noted in Section One above, Cabinet agreed in June 2025 to the scope and general

⁷ Section 6 of the Conservation Act 1987 will be amended to include economic development, alongside tourism.

⁸ For example, DOC can foster the use of natural and historic resources for recreation and tourism is only to the extent that this is not inconsistent with conservation of those resources (s.6(e) of the Conservation Act 1987).

content of the NCPS.⁹ Many existing policies will simply be carried over and consolidated into the NCPS, with minor adjustments in wording for readability and understanding. This ‘lift and shift’ from existing policy documents will not generate new or additional regulatory impact and consequently, is considered out-of-scope for this RIS.

63. With the exception of one policy aspect (private accommodation), this RIS will not consider these specific policies as they impose no new regulatory requirements on any parties over and above those already required under DOC’s operational policies, conservation legislative requirements and existing general policies.
64. There are also some activities set out in area plans that have been consolidated in the NCPS to provide greater national consistency. Area plans across the country list many of the same types of DOC activities that are exempt from a resource consent¹⁰, (for example, construction and upgrades of tracks, campsites and amenities, as well as signage, fire management, etc).
65. As agreed by Cabinet,¹¹ the new NCPS will provide a list of the most common types of activities that are exempt from seeking a resource consent. This will reduce administrative costs for DOC and provide greater clarity for regional councils issuing natural resource permits/consents for land use. The NCPS will limit the ability of area plans to list additional activities but will ensure addressing unique activities at a local level with the NCPS enabling the Director-General to exempt such activities (provided the proposed work is consistent with the relevant area plan and adequate measures are in place to manage any adverse effects).
66. This RIS will not consider this specific policy as it generated no new regulatory requirements on any parties over and above those already required under DOC’s operational policies and resource management legislative exemptions.

Treaty of Waitangi

67. The Government’s Treaty obligations relating to conservation are reflected in section 4 of the Conservation Act, specific commitments in Treaty settlement legislation, and agreements with iwi and hapū (e.g. relationship agreements and protocols). This flows through to requirements in developing the first NCPS (and subsequent amendments).
68. The Bill will provide that the changes introduced through the reforms (including the NCPS proposals) stand except where Treaty settlements provide alternative arrangements.
69. Engagement with iwi, including post-settlement governance entities (PSGEs), has been ongoing since November 2024 to discuss how to uphold Treaty settlement commitments in the context of the wider reforms. There has been targeted engagement with Treaty partners on the design of the proposals for the NCPS and DOC’s ongoing engagement with iwi on upholding settlements also includes discussion of the NCPS proposals.

⁹ Cabinet (2025) *Modernising Conservation Land Management: Policy Approvals*, 30 June 2025, CAB-25-MIN-0213 (Rec 2.1 and 2.2 and Appendix 1 under ECO-25-SUB-0096)

¹⁰ The Resource Management Act 1991 (s.4) states that a land use resource consent is not required for work of the Crown on conservation land, where that work is consistent with a management plan and does not have significant effects beyond the land boundaries. The ability to specify the types of activities exempt from a consent in area plans be extended and consolidated in the NCPS,

¹¹ Cabinet (2025) *Modernising Conservation Land Management: Policy Approvals*, 30 June 2025, CAB-25-MIN-0213 (Appendix 1, 5.3)

70. Engagement with iwi will include consideration of how to uphold settlements in the new area plan framework.
71. During consultation on the proposals in July 2025, iwi and hapū raised concerns that streamlining area plan content would limit their ability to influence management of conservation land. Iwi were concerned about the impact of the proposals on their rights and interests, for example, that the pre-approved activities remove opportunities for them to be consulted on these activities, or the narrower scope of the area plans removed an opportunity to influence management of conservation land.
72. The NCPS proposals seek to minimise any impact arising from the changes and consolidation in a variety of ways:
 - a. First, all area plans will be required to list Treaty of Waitangi settlements that are relevant to the area or part of the area covered by the area plan's boundaries. This ensures that settlements and any relevant agreements can be considered when making decisions relevant to an area plan.
 - b. Second, specific conditions attached to various low-impact 'pre-approved activities' (eg guiding, research and collection, filming and events), that aim to protect cultural sites and taonga, ensure guidance from mana whenua is sought on use of cultural information, and with specific requirements for events and filming relating to Ngai Tahu.
 - c. Third, the concession activities covered by visitor zones 'pre-assessment' would still be subject to consideration of any impact on cultural values.
73. Iwi will have a specific role in updating and amending the NCPS and area plans, with specific consultation and commentary provided during early drafting, public notification and revision phases of the process, with the Director-General preparing an impact analysis report that will cover impacts on Treaty rights and interests.
74. Where Treaty settlements note statutory engagement obligations of DOC (or any other relevant obligations) with PSGEs, these will be upheld in the amended system.
75. Details for process will be set out in the Bill.

Proposal 1: Making area plans more focussed on information that directs regulatory decisions

76. Cabinet agreed in June 2025 that the purpose of area plans is to implement the NCPS and to set, where necessary, objectives and policies specific to the local context.
77. The NCPS will specify what content an area plan can include, to support faster and more consistent interpretation of area plans during concession decisions and remove restrictions on tourism and recreation activity, where appropriate.

What options are being considered?

- **Option 1 – Status Quo:** No constraints on area plan content.
- **Option 2 –** Allow area-specific policies (such as policies for the management of vehicles or aircraft), including limit-setting.
- **Option 3 –** Do not allow area-specific limit-setting policies (**preferred option**).

Option 1 - Status Quo

78. Under the status quo, decisions have been taken on the broad scope of area plan content but not on the specific policies that can be included. Cabinet has agreed that area plans can (within the bounds set by the NCPS) set area-specific objectives and policies. Area plans can also include concise descriptions of core conservation values of places. Area plans cannot:
 - Be inconsistent with the legislation or NCPS.
 - Include actions or milestones.
 - Duplicate the legislation or NCPS.
 - Set limits based on the number of concessionaires that can operate within a limit.
 - Affect agreements or contracts between the Crown and landowners (status quo for CMSs).
79. Under this option, the NCPS will set no further bounds on area plan content. The scope of an area plan and its content will be guided by the Cabinet decisions above with other content determined through each area plan development process in each area.

Option 2 – NCPS allows area-specific limit setting policies

80. Under this option, area plans will include the content agreed by Cabinet in June 2025 i.e. plans can (within the bounds set by the NCPS) set objectives and policies for each area and can also include concise descriptions of core conservation values of each area.
81. Plans will also:
 - a. Map PCL into visitor zones to implement the standardised objectives for recreation and pre-assessment of concession activities set out in the NCPS.
 - b. Include contextual information for DOC staff and concessionaires, including a clear list of relevant Treaty settlements.
 - c. Include descriptions of the significance to tangata whenua of the land, marine areas, and taonga administered by the Department within the boundaries of the area plan.
 - d. Include policies for the management of specific activities.

82. However, the NCPS will not include any constraints on policies that are specific to the area. For example, area plans can continue to include policies that place limits or conditions for concessionaire activities and other policies that are specific to the area or place.
83. Additional content may be required for specific area plans to uphold Treaty settlement redress.

Option 3 – NCPS does not allow area-specific limit setting policies (preferred option)

84. Under this option, area plans will include the content in Option 2 above. The NCPS will also specify that area plans cannot include area-specific limit-setting policies. Removing limits will create a more enabling environment for economic development while protecting conservation values.
85. Place-specific limits and conditions are usually used to manage overcrowding or cumulative effects of activities. A range of tools can be used to manage overcrowding or cumulative effects including booking systems, access charges (once enabled¹²) and place-specific regulations and bylaws. These alternative tools are preferable to area plans as:
- many activities with adverse effects are undertaken by both concessionaires and recreational users (e.g. guiding, vehicle use). Area plans do not have the ability to regulate the public (i.e. they cannot limit or impose conditions on activities that do not require an authorisation or booking). It is therefore sensible to use tools that can address the problem entirely (both recreational users and concessionaires).
 - use of other tools avoids place-based limits and standard conditions being managed across both area plans, bylaws and regulations, which can create complexities for understanding the rules that apply nationally.
 - it avoids potential inconsistency across the country if some areas impose limits and conditions through area plans and other areas through secondary legislation (the NCPS)
 - many conditions are better managed through the concession process and operational policy as they are often case-specific and issues change over time.
86. However, the processes for creating bylaws and regulations under conservation legislation are complex because they relate to land classifications established by different Acts. Some are also created via order in council and others via the gazette. This means that neighbouring conservation land can have different regulatory processes for regulating the same issue.
87. There is also less scope for public consultation on bylaws and regulations. DOC currently gets feedback to develop new bylaws and regulations through consultation on statutory documents such as management plans. In the new system the scope of consultation will be limited as the scope of area plans is more confined.

¹² Access charging is a separate part of the Conservation Acts (Land Management and Other Matters) Bill and will not be enabled through the NCPS.

How do the options compare to the status quo?

	Option 1 - No constraints on area plan content (status quo)	Option 2 – Allow area-specific limit-setting policies	Option 3 – Do not allow area-specific limit-setting policies
Conservation and other interests	-- With an undefined scope, plans will remain large, unwieldy documents that hinder the assessment of impacts on conservation values and slow concessions processing. They will continue to include place-based policies and limits that may constrain economic activity.	- More streamlined content may support more consistent assessments of impacts on conservation values. Including place-based policies and limits may slow decision making in some cases and constrain economic activity (e.g. where decisions are delayed due to managing policies across documents).	+ More streamlined content and removing place-based policies and limits may support more consistent assessments of impacts on conservation values and reduce barriers to appropriate economic activity, while protecting natural and historic resources.
Regulatory stewardship	-- With an undefined scope, it is likely that there will continue to be variation in the approach to plan content and that plans will continue to be catch-all instruments. The risk of inconsistent or overlapping information would remain. There will likely be ongoing uncertainty for applicants and inconsistencies in how plans are used in regulatory decisions.	- Allowing area specific limits to be included risks inconsistency in how these are applied across different areas.	+ Removing inconsistent policies can make regulatory decisions more consistent and provide more certainty for applicants.
Government costs and efficiencies	-- With an undefined scope, plans are likely to remain unwieldy documents that will slow decision-making and make plan revisions onerous and costly.	- Plans are likely to remain large documents that may slow decision-making and make plan revisions costly.	+ Area plans will be short, clear documents. This will support faster decision making and faster and less costly review of area plans by clearly defining the scope of area plans before the planning process.
Feasibility of implementation	0	-	+

	Option 1 - No constraints on area plan content (status quo)	Option 2 – Allow area-specific limit-setting policies	Option 3 – Do not allow area-specific limit-setting policies
	Having no constraints may be operationally feasible in the short term, but will exacerbate existing challenges, unclear processes and inconsistent practices.	May require significant effort to align content across plans and avoid overlap with higher-level instruments.	Feasible and likely easier to implement due to clearer scope and smaller plan size, but will require work to understand where other instruments are required.
Treaty of Waitangi	0 No change to engagement with Iwi on plan content. Plans will continue to provide for content required to uphold Treaty settlement redress.	0 Iwi may be concerned that streamlining area plan content will limit the ability of tangata whenua to influence management of conservation land. However, improved clarity with standardised structures should facilitate improved engagement with iwi/hapū. DOC is continuing to engage with Iwi on these matters. Plans will continue to provide for content required to uphold Treaty settlement redress.	0 Iwi may be concerned that streamlining area plan content will limit the ability of tangata whenua to influence management of conservation land. However, improved clarity with standardised structures should facilitate improved engagement with iwi/hapū. DOC is continuing to engage with Iwi on these matters. Plans will continue to provide for content required to uphold Treaty settlement redress.
Overall Assessment	-6	-4	4

Key: Compared to the status quo

++ much better

+ better

0 about the same

- worse

-- much worse

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

88. Option 3 provides the highest net benefits as it is the most feasible to implement, will provide more consistent assessments of impacts on conservation values (while protecting natural and historic resources). This will unlock more economic activity, where appropriate.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

89. Yes.

What are the marginal costs and benefits of the preferred options in the Cabinet paper?

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
DOC	Implementation costs —communications with the public and concessionaires, transitioning existing planning documents to new area plans¹³, ensuring Treaty settlements continue to align with the new planning approach.	<i>Low</i>	<i>Medium</i>
Concessionaires (including applicants)	No additional costs.	<i>Nil</i>	<i>High</i>
Iwi and hapū	Implementation costs – to consider the impact of the revised scope of plans and participate in engagement on new and amended plans.	<i>Low</i>	<i>Medium</i>
Public (including environmental NGOs)	No additional costs.	<i>Nil</i>	<i>High</i>
Total monetised costs	Implementation costs for DOC.	<i>Low</i>	<i>Medium</i>
Non-monetised costs	No additional non-monetised costs.	<i>Nil</i>	<i>Medium</i>
Additional benefits of the preferred option compared to taking no action			
DOC	A targeted, partial review of a conservation management strategy has been estimated to have cost DOC \$500,000¹⁴, compared to an estimated cost for a preparation of an entire area plan of	<i>High</i>	<i>Medium</i>

¹³ The estimated cost for a preparation of an entire area plan is between \$381,500 - \$761,500. The number of area plans is to be determined. This is likely to be cheaper than reviewing current planning documents under the status quo; see 'Benefits' below.

¹⁴ See <https://www.regulation.govt.nz/assets/RIS-Documents/Regulatory-Impact-Statement-Conservation-land-management-planning.pdf>

Affected groups	Comment	Impact	Evidence Certainty
	between \$381,500 - \$761,500. The preferred option of not allowing area-specific policies and limit setting would therefore be expected to contribute to savings for DOC compared to the status quo.		
Concessionaires (including applicants)	More concise plans will support more consistent decision making	<i>High</i>	<i>Medium</i>
Iwi and hapū	More concise plans will support more consistent decision making and may reduce resource required from iwi and hapū to participate in concessions processes.	<i>Low</i>	<i>Low</i>
Public (including environment NGOs)	More concise plans will support more consistent decision making and may help generate new economic activities, delivering social and economic benefits to local communities.	<i>Low</i>	<i>Medium</i>
Total monetised benefits	Monetised benefits cannot be estimated.	<i>Medium</i>	<i>Low</i>
Non-monetised benefits	- All parties will have greater clarity and certainty on the types of activities that are allowed (or likely to be approved/declined) on conservation lands. - There are economic and social benefits of removing unnecessary regulatory barriers to the use of public conservation land. - Non-monetised benefits cannot be estimated.	<i>Medium</i>	<i>Medium</i>

Proposal 2: A set of low-impact activities for pre-approval and exemption

What options are being considered?

- **Option 1 - Status quo:** Decisions have already been taken on the mechanism to establish class concessions, but no specific activities have been identified for the first NCPS.
- **Option 2:** The first NCPS will specify the set low-impact activities (listed in Appendix 2) that will be exempt from needing a concession, or that will be pre-approved for a concession (**preferred option**).

Option 1: Status Quo

90. Under the status quo, decisions have been taken on the mechanism to establish class concessions, but concessions would continue to be processed on a case-by-case basis.

Option 2: The first NCPS will specify a set of low-impact activities that will be exempt from/pre-approved for a concession

91. The set of exempt and pre-approved activities proposed to be included in the first NCPS are provided at Appendix 2. The proposed list includes guided activities, transportation services, small commercial events, commercial filming and photography, and research and collection.
92. We conducted an effects assessment for each of the activities identified, including considering the potential cumulative effects of the activity. The information from this assessment was used to inform:
- whether an activity can be exempted or pre-approved by the NCPS (ie in line with the criteria agreed by Cabinet),
 - what terms and conditions are required to ensure that adverse effects can be avoided, mitigated, or remedied,
 - whether activities can be enabled nationally or by land classification.
93. The lists of activities for exemption and pre-approval were consulted on in July-August 2025, and there was broad support for them. Many submitters raised concerns that low-impact activities could have a cumulative effect on the environment.
94. This concern has been addressed through the terms and conditions associated with the different activities and by making the activities subject to any limitations and restrictions imposed through local by-laws or regulations to manage environmental impacts. DOC can create bylaws and regulations for the conservation legislation it administers.
95. Exempt activities are sufficiently low impact that we do not anticipate they will have significant cumulative impacts. Pre-approved activities are also considered low impact but will allow DOC to monitor for any potential cumulative impacts through the online application process.
96. For each type of activity, DOC has done an initial assessment of the specific land classifications in which pre-approved and exempt activities can or cannot occur (see Appendix 2).

97. The NCPS will specify standard conditions that will apply to pre-approved and exempt activities by land classification, as well as specifying a standard or maximum term for the permit. The details of the terms and conditions will be available in the proposal document for the NCPS and are not separately analysed in the RIS as they do not introduce any new conditions that would not apply to a concession under the status quo.
98. Option 2 will reduce processing time for approximately 30–40 percent of concession applications. This will enable allocation of greater amounts of DOC resourcing to concession applications that are more complex, novel (and potentially innovative) and take more detailed assessment and engagement.
99. Pre-approved and exempt activities are by definition low-impact, even with high volumes they do not generate significant costs in processing each application. Some activities in these categories may still need to be processed by DOC, particularly where the activity needs to operate outside of the standard conditions, or on land classifications where they are not permitted.
100. In 2024, the total application fees for processing all applications in the exempt and pre-approved was an estimated \$409,000, as follows:

Exempt / Pre-approved activity	Estimated Applications 'Processed'*	Total application fees 2024 \$m
Guiding	345	\$0.233
Drones	203	\$0.037
Research and collection	65	—
Filming and Photography	294	\$0.034
Events	81	\$0.050
Transportation (boats and vehicles)	87	\$0.055
Total	1068	\$0.409

* Processed = Applications invoiced in 2024 (guiding, events and transport) or applications received in 2024 (drone use, filming and photography, and research and collection as these activities do not usually pay activity fees and have low invoice numbers). All applications exclude 'notified applications' as these are unlikely to meet the conditions for exempt/pre-approved

101. There will still be costs for DOC in processing pre-approved applications, but it will be an automated, online process for these applications and will cost significantly less than the current case-by-case process.

How do the options compare to the status quo?

	Status quo	Option 2 – Set of exempt and pre-approved activities for first NCPS
Conservation and other interests	0 Concession applications continue to be assessed on case-by-case basis, adding time and costs for applicants undertaking low-impact activities. Continued use of case-by-case process could discourage some users from undertaking activities.	++ Enables 16 low-impact activities to take place on PCL in a faster, more consistent and effective manner. Area plans can also disapply any pre-approved activities if any would cause significant adverse effects at a specific site.
Regulatory stewardship	0 Uncertainty will remain about what activities can be undertaken on PCL and how applications will be processed.	+ Provides clarity and certainty for DOC and applicants. Review processes for the NCPS enable the list of exempt/pre-approved activities to be kept up-to-date and changes made to terms and conditions to better manage any potential effects. The Bill also enables the DG to pause an activity in an area, if needed (for example, where continuing the activity will cause significant harmful cumulative effects).
Government costs and efficiencies	0 Low-impact activities add to the volume of processing and can lead to longer processing times. Large suite of documents and concessions for people wanting to undertake activities on PCL to understand.	++ Option will remove or reduce concession application volumes by 30–40% per year, and free-up concession processing for the more intensive, higher-impact activities.
Feasibility of implementation	0 The existing concession process for the activities proposed to be pre-approved or exempt will remain. This would be straightforward to implement, but there would be no benefits of this approach towards the desired outcomes.	+ There is a current operational work programme to allow faster approval of some low-risk activities (e.g. using standard terms and condition). Further work is underway to establish an automated online application process for these activities and implementation of pre-approved and exempt activities will build of these operational changes. Will be some initial work to establish new systems and communicate changes to applicants and decision makers. Likely to be more efficient going forward.

	Status quo	Option 2 – Set of exempt and pre-approved activities for first NCPS
Treaty of Waitangi	0 The implementation of option 1 does not impact Treaty Settlement commitments.	0 The implementation of option 2 does not impact Treaty Settlement commitments. Pre-approved activities may remove opportunities for iwi to be consulted on individual applications, freeing-up capacity to input on applications involving higher-impact activities. Treaty partners may be concerned with the NCPS taking a more active role in regulating activities.
Overall Assessment	0	6

Key: Compared to the status quo

++ much better

+ better

0 about the same

- worse

-- much worse

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

102. Option 2 saves concessionaires time and resources and reduces the volume of applications from DOC's concession processing system (30-40 percent of applications). Option 2 delivers the highest net benefit to both government and concessionaires.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

103. Yes.

What are the marginal costs and benefits of the preferred options in the Cabinet paper?

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
DOC	Implementation costs —communications with public and concessionaires, transitioning existing planning documents to new area plans, ensuring Treaty settlements continue to align with the new planning approach.	<i>Low</i>	<i>Medium</i>
Concessionaires (including applicants)	No additional costs	<i>Nil</i>	<i>High</i>
Iwi and hapū	- Participation and engagement costs in making area plans, and future review and amendment to NCPS and area plans - Reduced opportunity to engage with DOC on high-volume, low-impact concession applications	<i>Low</i>	<i>Medium</i>
Public (including environmental NGOs)	No additional costs	<i>Nil</i>	<i>High</i>
Total monetised costs	Implementation costs for DOC.	<i>Low</i>	<i>Medium</i>
Non-monetised costs		<i>Low</i>	<i>Low</i>
Additional benefits of the preferred option compared to taking no action			
DOC	Removal or automated processing for 30-40 percent of concession applications with 16 activities pre-approved or exempt, freeing up DOC application processing capacity.	<i>High</i>	<i>Medium</i>
Concessionaires (including applicants)	Faster and simpler concession application process for 12 low-impact pre-approved activities. Some activities will not need a concession at all.	<i>High</i>	<i>Medium</i>

Affected groups	Comment	Impact	Evidence Certainty
	Lower fees for exempt/pre-approved activities, but specific amount not determined.		
Iwi and hapū	- Reduces need to engage with DOC on high-volume, low-impact concession applications - Input into the preparation and review of NCPS and area plan (including changes to the list of exempt/pre-approved and pre-assessed activities).	<i>Low</i>	<i>Low</i>
Public (including environment NGOs)	Clearer policies on activities that can be undertaken on conservation land may help generate new economic activities, delivering social and economic benefits to local communities.	<i>Low</i>	<i>Medium</i>
Total monetised benefits	- DOC would have an estimated 30-40% fewer concession applications to process. - Estimated costs to DOC to process applications for these activities was approximately \$0.400 m in 2024).	<i>High</i>	<i>Medium</i>
Non-monetised benefits	- All parties will have greater clarity and certainty on the types of activities that are allowed (or likely to be approved/declined) on conservation lands, improving the efficiency of the concessions system (reducing the application processing times on many concession applications). - There are economic and social benefits of removing unnecessary regulatory barriers to the use of public conservation land.	<i>Medium</i>	<i>Medium</i>

Proposal 3: Guidance on where activities are more likely to be suitable based on land classifications and visitor zones

What options are being considered?

- **Option 1: Status quo** No pre-assessment
- **Option 2:** The NCPS provides guidance on where specific types of higher-impact activities are more likely to be suitable across different types of land classifications and visitor zones. The NCPS will require area plans to assign visitor zones to all PCL within its boundaries (**preferred option**).
- **Option 3:** Activity criteria approach (NCPS to include more detailed criteria for decision makers and prospective concessionaires, with operational policy used to provide more spatial information).

Option 1: Status quo

104. Under the status quo, activities will be assessed on a case-by-case basis with no guidance provided on where activities are likely to be suitable.

Option 2: Providing guidance on where activities are more likely to be acceptable based on visitor zones and land classifications

105. The NCPS would set out the description of visitor zones and provide guidance on where a set of 26 moderately sized but economically significant activities are likely to be consistent with statutory land classifications and visitor zones.
106. These higher impact activities include building recreation and tourism infrastructure and facilities and utilities, roading, and public infrastructure. These activities are detailed in Appendix 5.
107. When making a concession decision, DOC must consider the effects of the activity on the area. This assessment includes effects on recreation. Clearer articulation of recreational objectives at a given area will make this assessment quicker and more consistent as the visitor zones set out (at a high level) the expected visitor experience and recreational objectives. This will help inform DOC's assessment of an activity (e.g. the expected levels of noise, artificial light, infrastructure and visitor numbers, as well as tranquillity and solitude at an activity).
108. The NCPS will set out the description of five types of visitor zones, and each area plan must designate all areas within their boundaries to one of these five visitor zones. The five visitor zones (with more detailed description in Appendix 4) are:
- i. Visitor amenities area¹⁵: This is also a statutory land classification. Legislation enables more intensive tourism and recreation development.

¹⁵ A visitor amenities area is a land classification being established through the Bill, which will provide for the development and operation of recreational and public amenities and related services appropriate for the public use and enjoyment of conservation land.

- ii. High visitor zone: Areas that provide easy access where most recreation and tourism occur, while protecting the significant natural or cultural features that attract visitors.
 - iii. Medium visitor zone: Large-scale natural settings where recreational activities are encouraged but infrastructure is limited to essential facilities.
 - iv. Low visitor zone: Large-scale remote natural settings with limited low-impact infrastructure and the experience centres on solitude, immersion in nature, and low contact with others.
 - v. Wilderness area: This is a statutory land classification. Legislation restricts certain activities (e.g. buildings, livestock, motorised aircraft landings, machinery, vehicles).
109. Some existing planning documents (e.g., conservation management plans, national park management plans) currently use ‘*visitor management zones*’ to map geographic areas to assist with planning (see Appendix 4 for examples of existing visitor management zones in New Zealand and Mount Cook/Aoraki maps).
110. Currently some management plans¹⁶ have mapped visitor management zones. These visitor management zones are used to help identify and plan for a range of recreational opportunities and are well understood by existing concessionaires and stakeholders. These current visitor management zones will be ‘mapped’ to the new proposed visitor zones of low, medium and high visitor zones. The proposed zones differ from existing visitor management zones due to their new purpose is the NCPS. Visitor zones will overlay existing land classifications; this means all conservation land will have both a ‘land classification’ and a ‘visitor zone’¹⁷.
111. Some submitters noted that the visitor zones should be co-designed with mana whenua to safeguard culturally significant areas such as wāhi tapu. The mapping of visitor zones in area plans will be consulted on through the process of developing and reviewing area plans, with iwi and community engagement. Area plans will also be required to include a summary of the significance to tangata whenua of the natural and historic resources administered by DOC.
112. Several submitters suggested the inclusion of a ‘no-go visitor zone’ for highly protected areas, or just using visitor zones in areas that already have high visitor activity. Any restrictions that limit or constrain public access would be made via bylaws or regulations. The current proposed visitor zones provide sufficient framing to identify areas of ‘high’ and ‘low’ visitor numbers.

Visitor zones and pre-assessment and concessions processing

113. One of the key legislative ‘tests’ when DOC is processing a concession application is whether the proposed activity is contrary to the purpose for which the land concerned is held – its classification (e.g., national park, recreation reserve). Under the status quo, this assessment can vary across plans and applications — resulting in this legislative assessment being applied differently for the same activity in different places.

¹⁶ 1 of the 12 National Park Management Plans and 7 of the 16 Conservation Management Plans

¹⁷ The exception is two land classifications which have particular requirements under legislation. Visitor amenities areas and wilderness areas will not overlap with visitor zones as legislated requirements cover aspects of the visitor experience. They will in effect act as their own visitor zones.

114. Providing guidance on where certain types of activities are likely to be consistent with visitor zones and land classifications provides applicants with greater certainty across three main activity areas:
- recreation and tourism infrastructure and facilities
 - grazing, beehives and planting
 - utilities, roading and public infrastructure.
115. The guidance has been prepared by assessing in advance the effects of these economically significant activities, against conservation values within each land classification and the recreational, tourism and other values within the five visitor zones. Appendix 5 sets out the matrix of visitor zones and land classification for the 26 types of activities.
116. The result of this is that all conservation land will be mapped to show where more intensive activities are likely to be approved, taking account of the land classification and visitor zone. The specifics of each application will still need to be assessed on a case-by-case basis, and all other requirements in legislation will apply. Discretion will remain to decline an application, if necessary, based on the individual assessment of the application.
117. Some submitters expressed concern that not all the list of proposed activities were appropriate in culturally or ecologically sensitive areas. Following further analysis and feedback on the proposal document, two proposed activities were removed from the list for 'pre-assessment': aircraft landings and ski-fields. These will be assessed on a case-by-case basis.
118. Other submitters suggested that some of these 26 activities (e.g. grazing or beekeeping) should be classified as 'pre-approved' (Option 1), rather than 'pre-assessed' (Option 2). However, the allocation of activities between the two options has been based on the impact of activities, and the need to monitor their location more closely.
119. The matching of activities with land classification and visitor zones will provide greater certainty for applicants (concessionaires) and make it easier for applicants contemplating new economic activities to understand where certain activities are, and are not, allowed. This will improve the efficiency in business planning for those undertaking activities on public conservation areas, potentially encouraging more applications and unlocking appropriate economic growth on conservation land.
120. The new approach will also improve the efficiency of DOC's concession processing (by reducing the number of applications likely to be declined) and speeding up the assessment of applications that have been positively 'pre-assessed' for various activities.
121. All but one of the 26 activities¹⁸ are pre-assessed as 'green' on over 50 percent of PCL and 10 activities are 'green' on 80 percent of PCL (based on land classification), and 11 activities are 'green' on more than half visitor zones.
122. Many submitters on the consultation proposal noted the potential benefits from visitor zones, particularly in terms of improving efficiency and streamlining decision-making.

¹⁸ Large tourism facilities are only pre-assessed as 'green' in 'Amenity Areas', a land classification specifically developed to support spatial planning and infrastructure development in areas with high visitor numbers.

There were some concerns raised that the approach could reduce local decision-making and input on individual concession applications by providing a 'green' light. However, the pre-assessment only provides an indicative assessment for an activity at a specific location, and there is still space in the application processing for local input (where appropriate) to affect the final approval of the application or affect the conditions DOC puts in place for the activity.

123. The impact of 'pre-assessment' of activities (Option 2) will have a more modest impact on DOC's decision-making process — the streamlining of concession processes will marginally reduce the amount of time for consideration required on individual applications, and reduce the need to assess 'red' applications (as the volumes will reduce for applications likely to be declined).
124. DOC invoiced \$618,000 for processing of concession applications for these 26 'economically significant activities' in 2024. If we assume the assessment of the matters covered by pre-assessment is 5–10 percent of the application processing time invoiced, this will provide a small saving in DOC's application processing costs (roughly \$40,000 to \$80,000 annually).
125. As well as cost savings, Option 2 provides increased certainty provided to applicants in business planning and developing new economic activities on conservation land. It is not possible to assess the impact the 'pre-assessment' will have on generating increases in the volume of future agricultural activities, tourism and recreational activities or utilities and public infrastructure.

Activities for 'designated areas'	Estimated Applications 'Processed'*	Total application fees 2024 \$m
Agriculture activities	405	\$0.188
Beehives	16	\$0.016
Grazing	364	\$0.156
Crops/viticulture / forestry	25	\$0.016
Tourism infrastructure & facilities¹	89	\$0.056
Utilities and Public Infrastructure²	515	\$0.374
Total	1,009	\$0.618

* Applications processed' uses number of applications invoiced in 2024 financial year

¹ Public accommodation, retail, eateries, staff facilities, leases etc

² Structures (public) and telecommunications, and access/easements for utilities

Option 3: Activity criteria approach

126. Under this option, NCPS would include detailed activity criteria that would need to be complied with for some economic activities. These criteria would build on the current criteria in s17U of the Conservation Act. Operational policy could be used to provide more spatial information (e.g., a non-regulatory approach to Option 2 above).
127. This is intended to provide more certainty to applicants about how an activity would need to be carried out in order for a concession to be granted. When planning their activity, the applicant would need to ensure they meet the criteria set out in the NCPS and demonstrate that they will be met in their application. For example, specific criteria would be included for applications for grazing concessions.

How do the options compare to the status quo?

	Status quo (case by case approach)	Option 2 – Guidance on whether specific activities are likely to be consistent with visitor zones and land classifications (preferred)	Option 3 - Activity criteria approach
Conservation and other interests	0 For most economic activities there is little national guidance for the pursuit of economic activities on PCL.	0 Will not have an impact on conservation interests, as activities will all still be assessed by DOC against the relevant legislative tests as part of the concession application process. May encourage applications for economic activities where likely to be approved.	0 Will not have an impact on conservation interests, as activities will still be assessed by DOC against the relevant legislative tests as part of the concession application process.
Regulatory stewardship	0 There is variation in how conservation policies are implemented nationwide.	+	0 Provides nationally consistent criteria for prospective concessionaires to consider before submitting an application for listed activities. Information on where specific activities may be more suitable would be in operational policy so may be subject to regional variation.
Government costs and efficiencies	0 Processing times are too long and create unnecessary costs for all parties in the conservation system.	+	0 Unlikely to greatly speed-up DOC's concession processing as all these higher-impact applications will need to be assessed against the relevant legislative tests. Level of information and cost for concession applications will remain largely unchanged.

	Status quo (case by case approach)	Option 2 – Guidance on whether specific activities are likely to be consistent with visitor zones and land classifications (preferred)	Option 3 - Activity criteria approach
Implementation	0 No additional implementation required. DOC continues to use existing processes and guidance, and no system changes or staff training would be needed.	+	0 More complex to implement as it would require nationally consistent criteria. It would also likely substantially lengthen the NCPS and/or area plans, which may delay their operationalisation. Implementation costs may vary depending on how much training and public communications required.
Treaty of Waitangi	0 No change	0 No change	0 No change
Overall Assessment	0	3	0

Key: Compared to the status quo

++ much better

+ better

0 about the same

- worse

-- much worse

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

128. Option 2 (pre-assessing activities against land classification and visitor zones) improves the information to concessionaires about the acceptability of particular economic activities across different parts of PCL. This reduces the effort of developing proposals that have limited chance of being approved and could encourage more applications in areas where such economic activity will be more likely to be approved.
129. This option does not provide much reduction in concession processing times or costs for DOC.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

130. Yes.

What are the marginal costs and benefits of the preferred options in the Cabinet paper?

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
DOC	Implementation costs — mapping the visitor zones, communications with public and concessionaires (including private accommodation owners), transitioning existing planning documents to new area plans, ensuring Treaty settlements continue to align with the new planning approach	<i>Low</i>	<i>Medium</i>
Concessionaires (including applicants)	No additional costs	<i>Nil</i>	<i>High</i>
Iwi and hapū	Participation and engagement costs in making area plans, and future review and amendment to NCPS and area plans	<i>Low</i>	<i>Medium</i>
Public (including environmental NGOs)	No additional costs	<i>Nil</i>	<i>High</i>
Total monetised costs	Implementation costs for DOC, particularly the mapping of PCL to visitor zones. Mapping of PCL to visitor zones would be in addition to the expected cost of preparing an area plan.	<i>Low</i>	<i>Medium</i>
Non-monetised costs		<i>Low</i>	<i>Low</i>
Additional benefits of the preferred option compared to taking no action			
DOC	Small reduction in enquiries about applications for 'pre-assessed' activities by providing certainty of	<i>High</i>	<i>Medium</i>

Affected groups	Comment	Impact	Evidence Certainty
	where activities are likely to be approved/rejected (savings of roughly \$40,000 to \$80,000 annually).		
Concessionaires (including applicants)	Pre-assessment of activities based on land classification and visitor zones will provide greater certainty about where a range of 26 activities can occur, potentially encouraging more applications and appropriate economic growth on PCL.	<i>High</i>	<i>Medium</i>
Iwi and hapū	Statutorily specified engagement with DOC on the review of NCPS and area plans (including changes to the list of exempt/pre-approved and pre-assessed activities.	<i>Low</i>	<i>Low</i>
Public (including environment NGOs)	Clearer policies on activities that can be undertaken on conservation land may help generate new economic activities, delivering social and economic benefits to local communities.	<i>Low</i>	<i>Medium</i>
Total monetised benefits	Monetised benefits cannot be estimated.	<i>High</i>	<i>Medium</i>
Non-monetised benefits	- All parties will have greater clarity and certainty on the types of activities that are likely to be approved/declined) on conservation lands, improving the efficiency of the concessions system (reducing the application processing times on many concession applications). - There are economic and social benefits of removing unnecessary regulatory barriers to the use of public conservation land. - Non-monetised benefits cannot be estimated	<i>Medium</i>	<i>Medium</i>

Proposal 4: Clarifying the approach to private accommodation on PCL

What options are being considered?

- **Option 1: Status quo** (the NCPS maintains current policy that all private accommodation must be phased out).
- **Option 2:** the NCPS will limit the ongoing use of private accommodation, including a term limit for concessions (**preferred option**).
- **Option 3:** the NCPS is silent on the phase-out policy.

Option 1: Status quo

131. Under the status quo, the existing phase out policy in the General Policies will be carried over to the NCPS. The current policy states that ‘existing private accommodation on conservation land will be phased out, except where specifically provided for in other instruments.’ There will continue to be no time limit on the phase out period.

Option 2: NCPS will limit the ongoing use of private accommodation, including a term limit for concessions

132. Under this option the NCPS will require conditions to be placed on all private accommodation concessions to demonstrably limit the ongoing use of the structures and associated facilities for private accommodation purposes, including a term that must not exceed 30 years, with no right of renewal.

133. A very limited number of existing private accommodation structures (that may pre-date conservation legislation) may be able to be granted a term longer than 30 years, in line with the existing section 17Z of the Conservation Act, which states:

(1) A lease or a licence may be granted for a term (which term shall include all renewals of the lease or licence) not exceeding 30 years or, where the Minister is satisfied that there are exceptional circumstances, for a term not exceeding 60 years.

134. Specifying a 30-year maximum term for private accommodation concessions will provide greater consistency regarding private accommodation at a national level and with how other uses of PCL are managed. Operational policy or national guidance will still be required to support decision-makers on the specific conditions to be applied to ‘demonstrably limit’ ongoing use of structures for private accommodation purposes (for example, whether removal would be appropriate after a certain period).

How do the options compare to the status quo?

	Status quo (General Policies require phase out but no time limit provided)	Option 2 – NCPS requires phase out and a term that must not exceed 30 years, with no right of renewal	Option 3 - NCPS is silent on the phase-out policy
Conservation and other interests	0 Likely to be continued inconsistency in how other uses of PCL are managed.	+	0 Likely to be continued inconsistency in how other uses of PCL are managed.
Regulatory stewardship	0 Lack of clarity about phase out term exacerbates the legal, operational and relationship risks associated with legacy structures. High likelihood of litigation.	+	0 Lack of clarity about phase out term exacerbates the legal, operational and relationship risks associated with legacy structures. High likelihood of litigation.
Government costs and efficiencies	0 No change to current costs associated with managing concessions and property interests, including litigation costs.	+	0 No change to current costs associated with managing concessions and property interests, including litigation costs.

	Status quo (General Policies require phase out but no time limit provided)	Option 2 – NCPS requires phase out and a term that must not exceed 30 years, with no right of renewal	Option 3 - NCPS is silent on the phase-out policy
Implementation	0 No change to current approach.	0 Potential for inconsistent approaches and decisions e.g. regional-scale differences in approach to structures of a similar nature (this would be mitigated through national operational policy).	0 No substantial changes to implement to status quo.
Treaty of Waitangi	0 No change.	0 No change.	0 No change.
Overall Assessment	0	3	0

Key: Compared to the status quo

++ much better

+ better

0 about the same

- worse

-- much worse

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

135. Option 2 (the NCPS requires phase out and a term that must not exceed 30 years, with no right of renewal) supports greater clarity, certainty and consistency for private accommodation owners and enables DOC to deliver more effective management of accommodation on PCL.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

136. Yes.

What are the marginal costs and benefits of the preferred options in the Cabinet paper?

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
DOC	Implementation costs —communications with public and concessionaires (including private accommodation owners).	<i>Low</i>	<i>Medium</i>
Concessionaires (including applicants)	No additional costs	<i>Nil</i>	<i>High</i>
Iwi and hapū	No additional costs	<i>Nil</i>	<i>Medium</i>
Public (including environmental NGOs)	No additional costs	<i>Nil</i>	<i>High</i>
Total monetised costs	Implementation costs for DOC.	<i>Low</i>	<i>Medium</i>
Non-monetised costs		<i>Low</i>	<i>Low</i>
Additional benefits of the preferred option compared to taking no action			
DOC	Policy clarity on private accommodation reducing legal, operational and management costs.	<i>Low</i>	<i>Medium</i>
Concessionaires (including applicants)	Clarifying policy on private accommodation will enable more consistent treatment and conditions.	<i>Low</i>	<i>Medium</i>
Iwi and hapū	Clarification on treatment of club and bookable accommodation in private accommodation policy provides more certainty for iwi/hapū options.	<i>Low</i>	<i>Low</i>
Public (including environment NGOs)	Clearer policies on activities that can be undertaken on conservation land may help generate new economic activities, delivering social and economic benefits to local communities.	<i>Low</i>	<i>Medium</i>

Affected groups	Comment	Impact	Evidence Certainty
Total monetised benefits	Monetised benefits cannot be estimated	<i>Low</i>	<i>Medium</i>
Non-monetised benefits	- All parties will have greater clarity and certainty on the treatment of private accommodation on conservation land, improving the efficiency of the concessions system. - Non-monetised benefits cannot be estimated.	<i>Low</i>	<i>Medium</i>

Section 3: Delivering an option

How will the proposal be implemented?

137. DOC will be responsible for implementing the proposals. There may also be changes to how other parties interact with these processes, such as concessionaires (including potential concessionaires), Treaty partners, businesses, researchers, local councils and the public.

Legislation and approval of the first NCPS

138. The first NCPS will be approved as soon as possible following the passing of the Bill. Drafting for the Bill is underway based on Cabinet's June and September 2025 decisions and will be ready for introduction to the House in April 2026.
139. Concessions being processed at commencement will be assessed under the improved legislative framework.

Upholding Treaty settlements

140. The conservation portfolio has more Treaty settlement commitments than any other portfolio. Many of these commitments embed involvement of Treaty partners in planning and concessions processes and are relevant to the proposals in this paper. Treaty partners' feedback during consultation strongly emphasised the need for the Crown to uphold settlement redress, and to engage meaningfully and in good faith.
141. DOC is currently engaging with post-settlement governance entities and this will continue for several months to come. These conversations will help identify how to provide material equivalence for redress in the context of system reform. For example, there may need to be appropriate carve-outs or grandparenting of bespoke arrangements and processes in settlements.

Operational policy and guidance

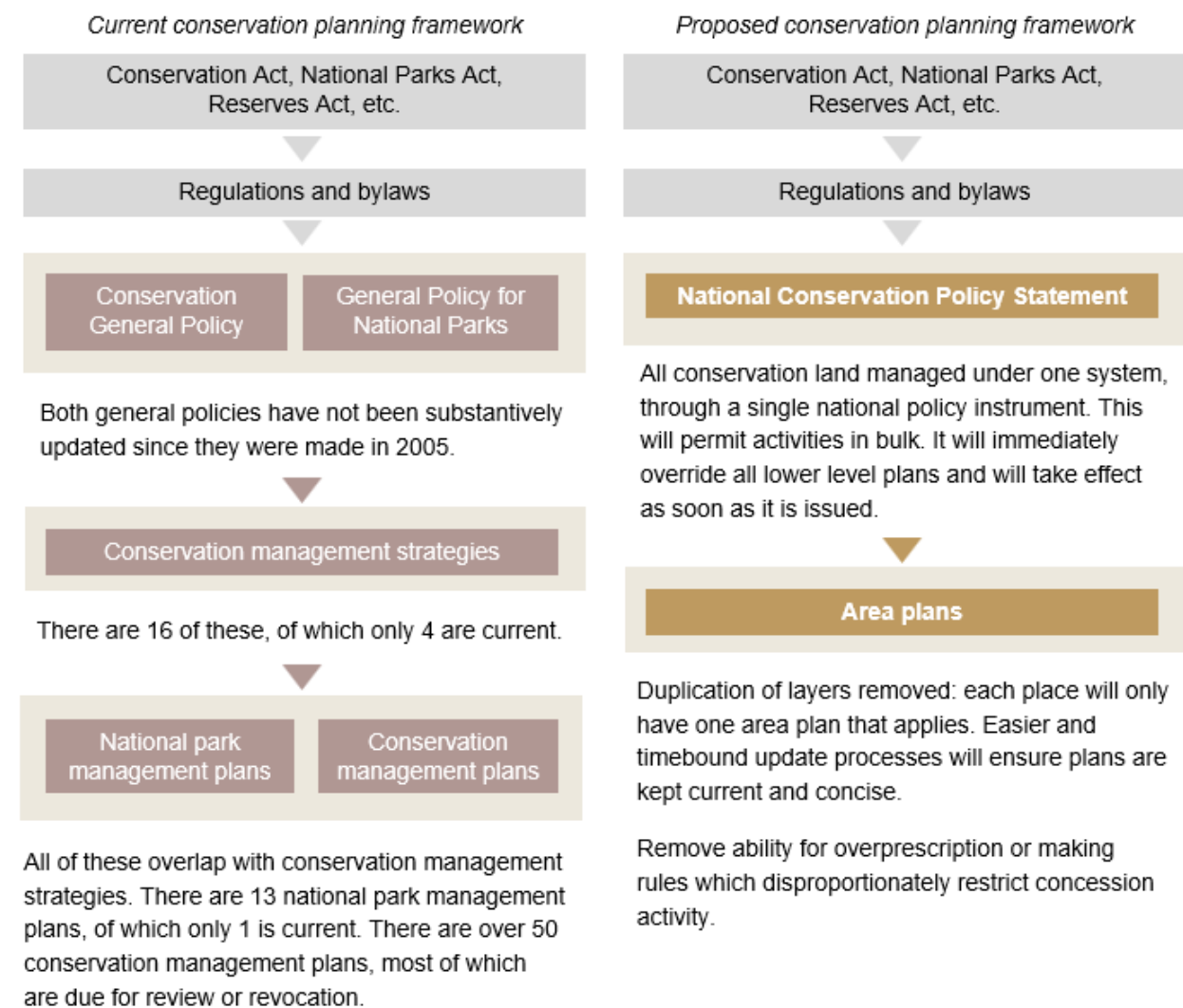
142. DOC will ensure it has the necessary systems, processes and resources to deliver the changes to concessions and area plans, as well as establishing new processes for monitoring compliance and enforcement. This includes establishing a new online system to implement the pre-approved concessions process.
143. Additional operational guidance may be necessary to give effect to the proposals. This includes operational guidance to support the streamlined process to assess the activities identified in Appendix X.
144. DOC will also provide information about the changes to the public, Treaty partners and regulated parties (including people with authorisations for private accommodation).

How will the proposal be monitored, evaluated, and reviewed?

145. DOC will be responsible for monitoring, evaluating, and reviewing any changes.
146. DOC will monitor the successful implementation of the new NCPS and new concessions processing changes by tracking (for example):

- concession application numbers and processing times. This will continue to be a metric in assessing the efficiency of the new system and monitoring the impact of ‘pre-approvals/exempt’ activities on applications and any cumulative impacts of these activities (through regular interactions noted below and through regulatory decision-making monitoring).
 - progress on development of new priority plans that need significant amendment beyond a simple translation process (eg Fiordland National Park). Monitoring this will identify where complex plan arrangements require specific policies or amendments to ensure the national direction is fit for purpose.
 - timeframes required to develop and amend area plans (including the use of any timeframe extensions). This will identify where plan amendment timeframes have been shortened compared to the old system.
 - monitoring private accommodation through the permissions system. Monitoring the level of phase out and any barriers to phasing out existing accommodation will identify whether the policy is fit for purpose.
147. DOC identifies and monitors issues on the ground in a range of ways, including through regular interactions with Treaty partners, stakeholders, and through monitoring of regulatory decision-making. These engagements help inform monitoring of the wider concession system.
148. DOC will manage issues with provisions in area plans or the NCPS as they arise, and alerting relevant decision-makers when risks or issues reach thresholds where amendments are warranted.
149. Monitoring and oversight of the new exempt/pre-approved activities will be undertaken as it will be essential to build trust in the new approach to some low-impact activities. Timely monitoring is key to be able to adjust conditions on any pre-approved permits or remove an activity from the ‘permit-exempt’ category if conditions change. Ongoing concession monitoring will continue. DOC needs to ensure sufficient resourcing for this, including cost recovery where appropriate. This ongoing compliance monitoring may reveal whether there is a positive impact on illegal operators.
150. The information from monitoring will be included in DOC’s usual accountability reporting (eg annual report, ongoing reporting of the performance of conservation programmes (<https://www.doc.govt.nz/our-work/monitoring/>), list of all active permissions granted by DOC (<https://www.doc.govt.nz/get-involved/apply-for-permits/active-concessions/>)). The information from monitoring and engagement at-place will be used to inform any future policy development or legislative change to further improve the conservation management planning system (and NCPS and area plan policies and objectives).

Appendix One: New conservation planning framework



Appendix Two: Pre-approved and exempt activities

Table 1: Proposed exempt activities

News of the day filming and photography
• Activity is undertaken by a news media organisation that is a member of the New Zealand Media Council. • Filming and photography should be using standard media tools, excluding drones. • No temporary or permanent structures are to be erected. • You must take all reasonable care to ensure wildlife are not disturbed unnecessarily. • Where possible, you must remain on formed tracks and not exceed any loading limitations placed on facilities and structures. • Reporting activity should not require the exclusive use of the areas or compromise the enjoyment or safety of other users in the area.
Collection of air for research purposes
• You must only use handheld equipment to collect samples. • You must take all reasonable care to ensure wildlife are not disturbed unnecessarily. • Where possible, you must remain on formed tracks or well-used routes designed to protect natural resources and cultural heritage of the land and not exceed any loading limitations placed on facilities and structures. • You must remove all markers, tape, or other material used for the purposes of the activity within one day of the activity being completed. • Collection sites are to be left in as natural a state as possible. All equipment must be removed from the site after the activities have been completed. • The activity must be undertaken in line with the bylaws and regulations that apply to the sites on which it is taking place.
Limited collection of water for research purposes
• You must only use handheld equipment to collect samples. • Samples are limited to what an individual can carry on their person within a 24-hour period. • You must take all reasonable care to ensure wildlife are not disturbed unnecessarily. • You must remove all markers, tape, or other material used for the purposes of the activity within one day of the activity being completed. • Collection sites are to be left in as natural a state as possible. All equipment must be removed from the site after the activities have been completed. • Where possible, you must remain on formed tracks or well-used routes designed to protect natural resources and cultural heritage of the land and not exceed any loading limitations placed on facilities and structures. • You must ensure that public access, public viewing opportunities and public enjoyment of public conservation land is not obstructed or restricted as a result of the activity.
Observational activities for research purposes (e.g. observing wildlife)
• You must take all reasonable care to ensure wildlife are not disturbed unnecessarily. • Where possible, you must remain on formed tracks or well-used routes designed to protect natural resources and cultural heritage of the land and not exceed any loading limitations placed on facilities and structures. • You must ensure that public access, public viewing opportunities and public enjoyment of public conservation land is not obstructed or restricted as a result of the activity.

Table 2: Proposed pre-approved activities

This table lists the pre-approved activities and includes the activity descriptions. Detailed terms and conditions will be published alongside each proposed activity in the NCPS.

Guiding
Guided walking (day walk or overnight/multiday) - Commercial guided walking on formed tracks or formed routes where the activity is not prohibited by bylaws or regulations. - Activity can be within a day, overnight or multi-day and may include staying in accommodation on PCL (whether a tent or hut etc). - Transportation (e.g. transporting clients by vehicle to and from PCL and vehicle transfers associated with a guided trip) is a separate activity (refer below).
Guided biking/mountain bike trips - Commercial guided trips on formed roads and designated bike tracks or multi-use tracks where the activity not prohibited by bylaws or regulations. - Includes guided trips on e-bikes (i.e. power assisted cycles with an auxiliary electric motor with a maximum power not exceeding 300W) on formed tracks where the activity is not prohibited by bylaws. - Activity can be within a day, overnight or multi-day and may include staying in accommodation on PCL (whether a tent or hut etc).
Guided horse-trekking - Commercial horse-trek guiding on formed roads and tracks where the activity is not prohibited by bylaws or regulations. - Activity must be undertaken within a day, with no need for overnight accommodation.
Guided rock-climbing trips - Commercial guided rock-climbing day trips where the activity is not prohibited through by-laws or regulations. - Includes rope-climbing only where there are authorised fixed bolts and anchors already in place and bouldering. - Activity can be within a day, overnight or multi-day and may include staying in accommodation on PCL (whether a tent or hut etc).
Non-powered, water-based guiding (e.g. kayaking, canoeing, white-water rafting) - Launch and landing non-powered boats (including but not limited to kayaking, canoeing, white-water rafting) for the purpose of guiding and where the activity is not prohibited by bylaws or regulations. - Activity can be within a day, overnight or multi-day and may include staying in accommodation on PCL (whether a tent or hut etc).
Four-wheel driving and quad-biking - Commercial guided motor vehicle trips (including in 4WD, quad bikes or motorbikes) on roads where the activity is permitted by bylaws and regulations. - Activity can be within a day, overnight or multi-day and may include staying in accommodation on PCL (whether a tent or hut etc).
Transportation
Commercial boat transport using powered watercraft (e.g. water taxis, charter boat trips, scheduled boat trips) - Launch and landing of powered watercraft for water transportation (including water taxi trips charter boat trips, jet boat trips). - Includes drop off and pick up using existing vehicle access and watercraft launching facilities where they exist and where the activity is not prohibited through by-laws or regulations.
Commercial transport to and from public conservation land Commercial transport to and from public conservation land using formed roads and carparks, where the activity is permitted by by-laws or regulations.
Drone use
- One-off drone use on PCL where the activity is not prohibited by bylaws or regulations. - May include use for recreational, commercial or scientific purposes.
Research and collection
Limited collection of rocks - Limited collection of rocks for research or cultural purposes. - Limited to what an individual can carry on their person within a 24-hour period and limited to a maximum 3 day trips per year. - Excludes fossils and cave formations, including stalactites and stalagmites. - Excludes all metallic minerals, fuel minerals, precious stones (as defined in the Crown Minerals Act 1991) and a prescribed substance within the meaning of the Atomic Energy Act 1945. - Excludes pounamu.
Limited collection of soil - Limited collection of soil for research or cultural purposes. - Sampling fewer than five times at the site. - Limited to what an individual can carry on their person within a 24-hour period. and limited to a maximum 3 day trips per year.
Limited collection of non-protected wildlife

- Limited collection of species not protected under the Wildlife Act 1953 for research or cultural purposes. - Excludes non-protected invertebrates of interest as listed on [schedule]. - Includes catching, handling and collection of live or dead animals, any parts of such, and any eggs or progeny. - May include destructive samples. - Does not include bird banding.
Collection of non-threatened flora - Collection of non-threatened flora (including plants, fungi and seeds) for research purposes. - Does not include collection of threatened or at-risk flora listed on [schedule]. - Includes collection for cultural purposes.
Events and filming Small scale commercial events on formed tracks or in established visitor areas - The event must occur within one day (no more than 24 hours) including set up and pack down. - Non-competitive events only (for example, does not include competitive sporting events that include running, biking, horse riding, vehicles). - Separate concession needed for commercial filming, photography or drone use. - High Visitor Zone – Max group size 15 people. - Medium Visitor Zone - Max group size 15 people. - Low Visitor Zone - Max group size 8 people. Small to medium scale commercial filming or photography on formed tracks or in established visitor areas - Concession is for one-off filming or photography projects and all onsite filming must take place within a 7-day period (consecutive days) for small scale filming or within a 21-day period (consecutive days) for medium scale filming. - Filming can only take place on existing tracks and/or in established visitor areas. - High Visitor Zone – Max group size 15 people (small scale) or 30 people (medium scale). Includes crew and talent. - Medium Visitor Zone - Max group size 15 people (includes crew and talent). - Low Visitor Zone - Max group size 8 people (includes crew and talent).

Table 3: Assessment of pre-approved activities against land classifications

Table 3 shows each proposed pre-approved activity against each land classification would be appropriate, and areas where individual case-by-case assessment of an application will be required.

Activity	Land classification												% of PCL	
	National Parks	Conservation Parks	Stewardship Areas	Scenic Reserves	Recreation Reserves*	Ecological Areas	Marginal Strips	Wildlife Management Areas	Amenity Areas*	Historic Reserves	Sanctuary Areas	Land held under s7 that is not a specially protected area	Other*	
% of PCL	34.16	23.78	26.81	4.73	2.62	1.5	0.6	0.24	0.11	0.07	0.04	1.48	3.86	
Commercial guided day walks or overnight walks on formed tracks	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		96.14
Commercial transport to and from public conservation land on formed roads and carparks	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		96.14

Activity	Land classification												% of PCL	
	National Parks	Conservation Parks	Stewardship Areas	Scenic Reserves	Recreation Reserves*	Ecological Areas	Marginal Strips	Wildlife Management Areas	Amenity Areas*	Historic Reserves	Sanctuary Areas	Land held under s7 that is not a specially protected area	Other*	
% of PCL	34.16	23.78	26.81	4.73	2.62	1.5	0.6	0.24	0.11	0.07	0.04	1.48	3.86	
Commercial biking/mountain bike/e bike trips on formed tracks	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓		95.26
Commercial boat activities using powered boats (e.g. water taxis, charter boat trips) using existing jetties and wharves	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓		95.26
Limited collection of rocks	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		95.54
Limited collection of soil	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		95.54
Limited collection of non-protected wildlife (e.g., most insects, pest species not covered under Wildlife Act 1953)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		95.54
Limited collection of non-protected flora /plants / fungi	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		95.54
Rock climbing (commercial guides) in areas already set up for this purpose	✓	✓	✓	✓	✓		✓		✓	✓		✓		94.36
Small scale commercial events on formed tracks or in established visitor areas	✓	✓	✓	✓	✓		✓		✓	✓		✓		94.36
Small scale commercial filming or photography on formed tracks or in established visitor areas	✓	✓	✓	✓	✓		✓		✓	✓		✓		94.36
Commercial guiding in non-powered boats (e.g. kayaking, canoeing, white-water rafting)	✓	✓	✓	✓	✓		✓		✓	✓		✓		94.36
Medium scale filming or photography on formed tracks or in established visitor areas	✓	✓	✓	✓	✓		✓		✓	✓		✓		94.36

Activity	Land classification												% of PCL	
	National Parks	Conservation Parks	Stewardship Areas	Scenic Reserves	Recreation Reserves*	Ecological Areas	Marginal Strips	Wildlife Management Areas	Amenity Areas*	Historic Reserves	Sanctuary Areas	Land held under s7 that is not a specially protected area	Other*	
% of PCL	34.16	23.78	26.81	4.73	2.62	1.5	0.6	0.24	0.11	0.07	0.04	1.48	3.86	
Drone use		✓	✓	✓	✓	✓	✓		✓	✓		✓		60.2
Guided vehicle trips (including 4WD trips) on formed roads		✓	✓	✓	✓		✓		✓	✓		✓		60.2
Commercial horse-trek guiding		✓	✓	✓	✓		✓		✓	✓		✓		60.2

*Class concessions are proposed to apply to Recreation Reserves that are not used for a specific purpose e.g. sports field, racecourse, campground, visitor centre, swimming pool.

*Amenities Areas include Visitor Amenities Areas and Natural Character Areas.

**Other conservation land includes:

- *Local and Government Purpose reserves* (0.54% of PCL), as these are held for a range of specific purposes, so it is not possible to assess the effects of activities at land classification level. Most of these reserves are vested in an administering body and are not required to have management plans in place, so disapplication would not be possible.
- *Nature and Scientific Reserves* (1.34% of PCL), as access permits may be required for these areas.
- *Wilderness Areas* (1.28% of PCL) as activities can only be authorised in these areas if desirable or necessary for preserving indigenous natural resources, which would require case-by-case assessment.
- *Wildlife Sanctuaries held under the Wildlife Act* (0.02% of PCL), as these areas can have place-specific conditions (for example, restrictions on undertaking recreational activities) and would require case-by-case assessment.
- *Land administered under the Waitangi Endowment Act* (0.01% of PCL), as the overarching purpose of the land is afforestation and silviculture.
- *Land held under section 7 of the Conservation Act that is designated as a Specially Protected Area* (0.66% of PCL) – set apart to preserve intact, with minimum human interference; an area that possesses indigenous plant or animal life or ecological, geological or historical features of significance.

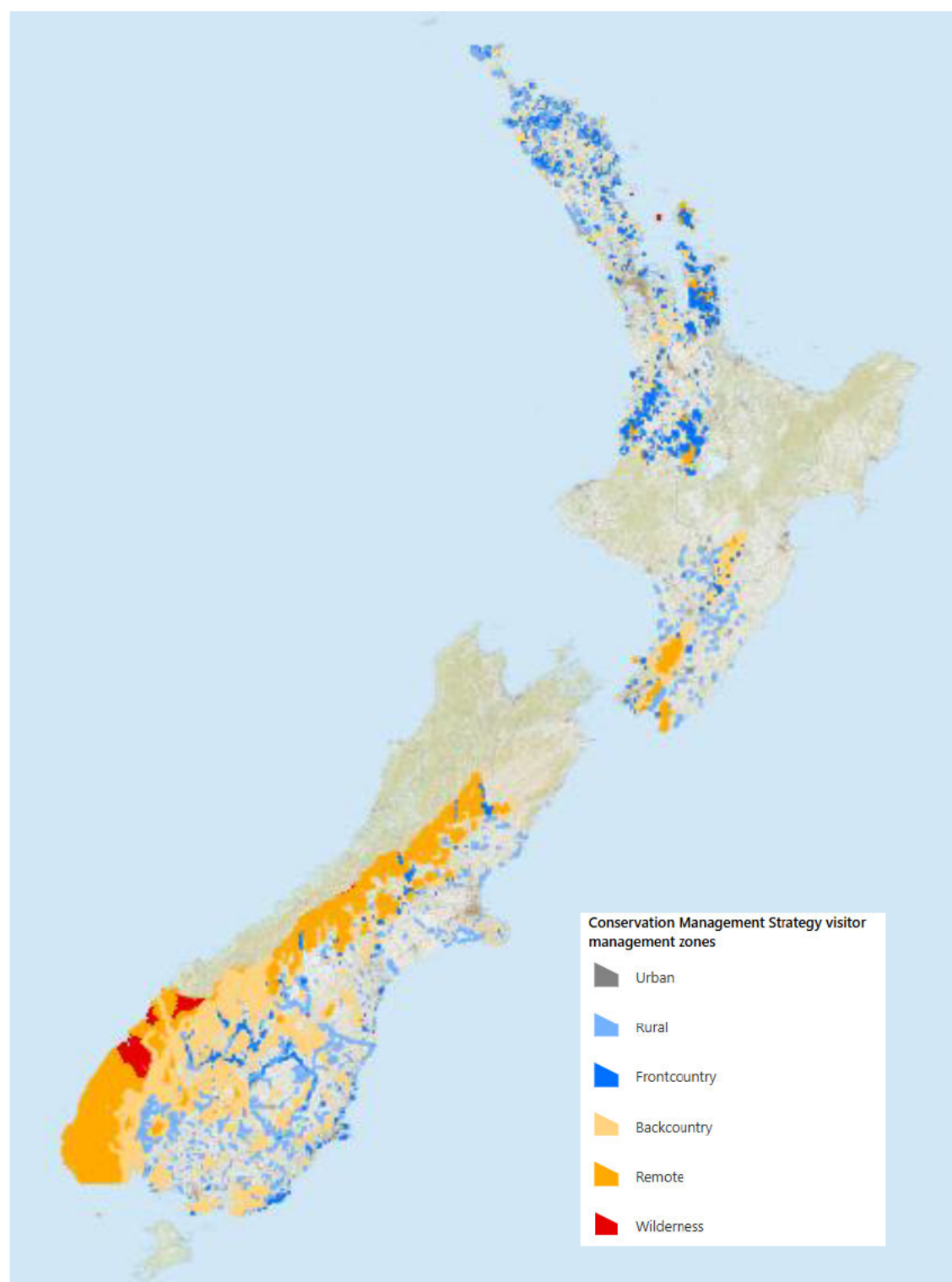
Appendix Three: Visitor Zones Description

Visitor zone	General description	Attributes	Objectives
Amenity area (land classification)	Areas to provide for facilities and infrastructure that support visitor access to and use of conservation areas. Legislation enables development and operation of recreational and public amenities and related services appropriate for public use and enjoyment of conservation land.		
High Visitor Zone	Areas that provide easy access where most recreation and tourism occur while protecting the significant natural or cultural features that attract visitors.	• Low-moderate tranquillity/natural quiet • Moderate levels of naturalness including visual, landscape qualities, natural light • At urban sites low levels of naturalness • May include significant natural or cultural feature that attract visitors • Low levels of solitude	• Significant natural and cultural heritage features at key visitor sites are protected from cumulative effects. • Visitors of most ages and abilities can easily access this zone • There is some (and occasionally higher) intrusion of infrastructure and other activities and a high degree of control, generally focused around key visitor sites and other high-use areas without diminishing the quality of their experience • There is a range of group sizes and social encounters, including large groups at times, Group sizes are managed to maintain a balanced experience, with thresholds set for some key sites and tracks. • There are tolerate moderate levels of artificial light at some sites where it contributes to the visitor experience. • There are low levels of noise, except at some sites where moderate levels of noise are associated with the visitor experience, so long as it does not unduly compromise the sense of tranquillity (low-medium tranquillity level).
Medium Visitor Zone	Large-scale natural settings where recreational activities are encouraged but infrastructure is limited to appropriate facilities, and the visitor experience supports a sense of space and quiet	• Moderate-high tranquillity/natural quiet • Moderate-high levels of naturalness (including visual, landscape qualities) • Moderate-high levels of solitude	• The integrity of the natural and cultural heritage features remains protected from cumulative impacts of use • Access requires some effort and planning (typically involving gravel roads, 4WD, tracks, waterways or aircraft landings, with walking and biking focused beyond the influence of motorised access) • Appropriate infrastructure can be expected where the effects on the

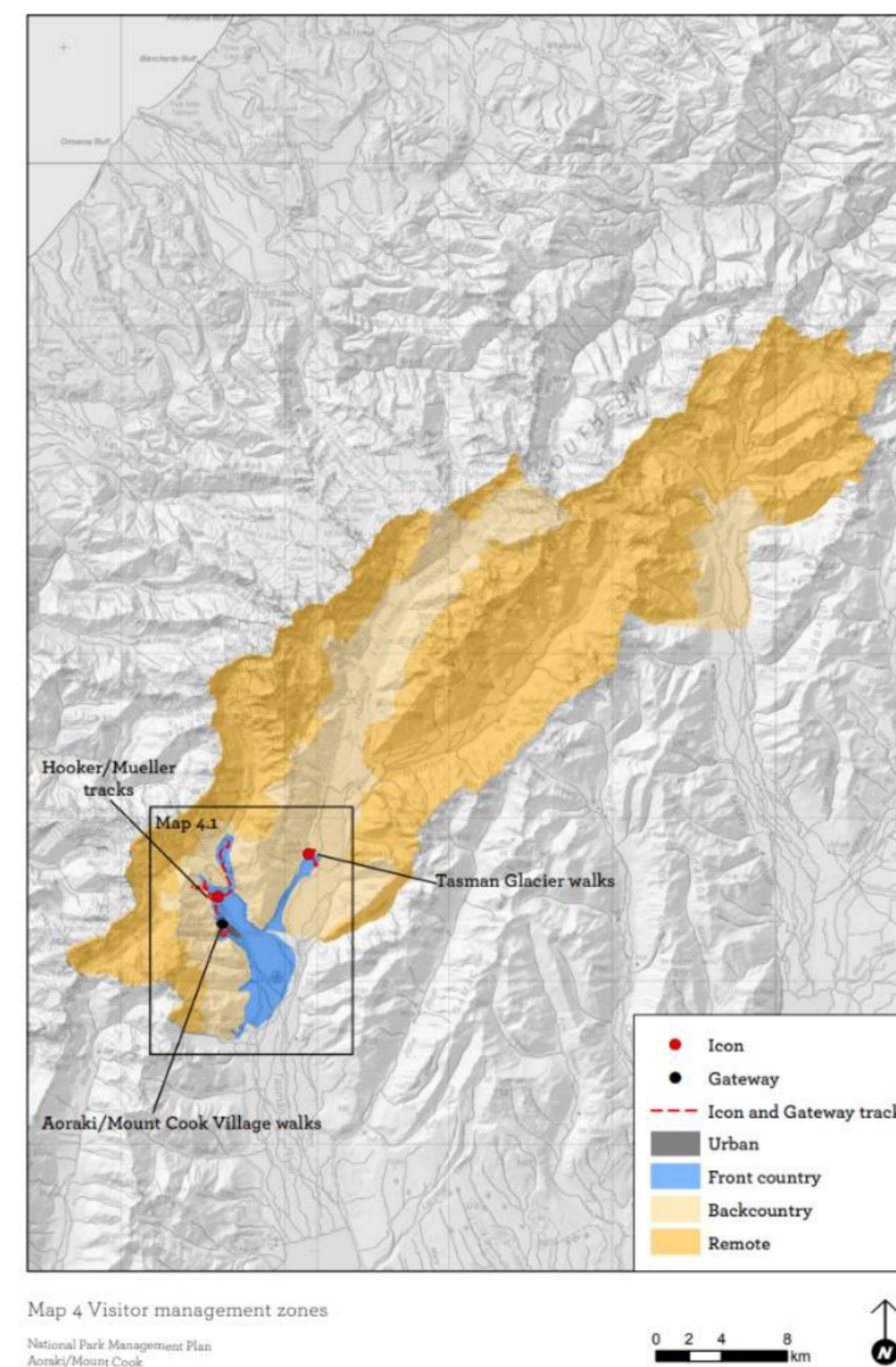
	while the integrity of the natural and cultural values that attract visitors is protected. • Predominantly natural light source	visitor experience are adequately avoided, remedied or mitigated. • There are moderate to high levels of solitude with opportunities to be away from other groups (preferred maximum group size 15). • There are generally low noise levels, but moderate noise is tolerated at times, provided it does not significantly compromise the tranquillity of the setting (medium tranquillity level). • Artificial light is generally limited to low levels, with higher levels tolerated only at key sites where it supports safety and amenity without significantly affecting the tranquillity of the environment.
Low Visitor Zone	Large scale remote natural settings with limited low impact infrastructure, where the experience is centred on solitude, immersion in nature, low contact with others and personal challenge ensuring protection of the natural remote setting. • High levels of tranquillity / natural quiet • High level of naturalness (including visual, landscape qualities) • Reasonably high level of solitude • Natural light source	• Access requires considerable self-reliance on back country skills (five or more hours travel mostly on foot from Front Country Zone, occasionally access supported by aircraft). • There is minimal intrusion of infrastructure • There is a reasonably high level of solitude, with minimal visual and noise intrusion from other people or activities, allowing for a peaceful and immersive experience in the natural environment (high tranquillity level). • There are low levels of noise intrusion • There is very low level of artificial light
Wilderness area (land classification)	Areas of solitude and natural quiet. Legislation restricts erection of buildings, machinery; access for livestock, vehicles, or motorised vessels or motorised aircraft; and construction of roads, tracks, or trails.	

Appendix Four: Examples of mapping of existing visitor management zones (Conservation Management Strategy)

The maps set out the visitor management zones (VMZ) for public conservation land, as defined in relevant Conservation Management Strategy documents since 2012. The zones attribute public conservation land with a 'recreation class' that defines the type of experience the topography and accessibility imply.



Source: <https://intmap.doc.govt.nz/internalmaps/index.html?viewer=docgis#>



Source: <https://www.doc.govt.nz/contentassets/7604d89909144a0b9e0bc556dc8d84f9/map-4-vmz.pdf>

Appendix Five: Activities with standardised pre-assessment

Table 1: Activity descriptions

Activity	Definition
Recreation and tourism infrastructure and facilities	
Unsealed tracks	Modifying land for the purpose of creating walking or cycling tracks. May include vegetation removal.
Sealed tracks	Construction of sealed or compacted gravel paths for the purpose of walking or cycling. May include vegetation removal, resurfacing, installing of barriers, guard rails, signage, bridges/culverts.
Large tourism facilities (hotels/motels/lodges, eateries, staff quarters)	Construction and operation of large tourism facilities (e.g., hotels, motels, lodges, eateries, staff quarters). Includes large structures with electricity, hot water, sewerage systems, and landscaping.
Commercial events	Holding of commercial events including competitive sports events, commercial filming/photography, festivals/concerts, weddings.
Small tourism facilities (huts, toilets, shelters)	Construction and operation of smaller tourism facilities (e.g., huts, toilets, shelters) • Huts: No electricity. Maximum capacity of 40 people in Amenities Areas, High Visitor Zone, and Medium Visitor Zone. Maximum capacity of 6 in the Low Visitor Zone. • Toilets: permanent or temporary toilets consistent with Department standards. • Shelters: small structures, no plumbing or electricity, not intended for overnight accommodation.
Campgrounds	Development and operation of public camping facility including sites for tents and campervans, toilets and shower facilities, kitchen shelters, accommodation for camp management. Maximum capacity of 36 people or 18 camping sites in the Medium Visitor Zone.
Outdoor education camps	Development and operation of camping facility for outdoor education, including sites for tents, small tourism facilities (as defined above).
4WD tracks	Construction of unpaved, unsealed surfaces suitable for use by specialised vehicles (e.g., four-wheel-drive cars, all-terrain vehicles, quad bikes). May include vegetation removal.
Car parks	Modifying and occupying land for the purpose of temporarily parking vehicles. May include vegetation removal and resurfacing and installing signage.
Grazing, beehives, and planting	
Native planting	Planting of native locally-sourced plant species. No harvest.
Exotic harvest	Harvest of timber from exotic tree species, using existing access routes. No replanting of exotic species, no harvest of native species.
Grazing	Pasture grazing of domestic animals such as sheep, cattle, deer, goats, llamas, alpacas, or horses.
Right of way for livestock	Access for domestic animals such as sheep, cattle, deer, goats, llamas, alpacas, or horses, for farm management purposes. Animals must be actively driven through the area and must not be left to drift or graze.
Collection of flora	Collection of seeds and cuttings from plants, including native plants, by hand-picking or using non-powered secateurs.

Beehives	Placement of bumblebee or honeybee hives. Does not include permission to access (e.g., land aircraft) or construct access (e.g., construction of roads).
Cropping	Sowing, cultivating, and harvesting crops, including pasture crops for cut and carry operations.
Utilities, roading, and public infrastructure	
Monitoring	Construction and operation of monitoring stations (e.g., water, geothermal, seismic, tsunami, weather). Includes wells, buoys, rain gauges, seismic vaults, concrete pads, and associated telecommunication equipment and cabling.
Wharves	Construction of wharves and jetties. Includes portable/removable jetty structures.
Bulk fuel storage	Secure storage of fuel, including excavation for underground storage.
Retaining wall	Construction of retaining walls.
Below-ground pipes and cables	Installation and maintenance of underground pipelines and cables and associated equipment for supporting, enclosing, surrounding or protecting the pipes or cables. Including the digging of trenches for the placement of the pipes or cables.
Above-ground masts and cables	Construction and maintenance of masts (e.g., power poles, telecommunications towers) and overhead lines (e.g., power cables, telecommunications cables)
Water supply schemes	Installation, operation, and/or maintenance of structures and associated facilities for water supply, including tanks, filtration plants, and associated buildings (e.g., pumpsheds).
Flood protection	Construction of structures to protect against floods, including flood walls and stop banks.
Roads	Construction of new roads that meet the definition of road under section 2 of the Land Transport Act 1998, and: • Are formed and maintained for vehicle use by the public, or routes that are marked by the Department of vehicle use by the public; or • Are formed and maintained for vehicle access for construction or maintenance of other structures or facilities. May include vegetation removal, excavation, landscaping, resurfacing.
Hydroelectric	Structures for hydroelectricity schemes, including dams, weirs, pumps, turbines, tanks, penstocks, powerhouses, and pipelines.

Table 1: Assessment of activities against land classifications

- **Green:** consistent with the land classification or visitor zone; this is where the Department anticipates activities will occur.
- **Red:** activity is inconsistent with the land classification or visitor zone. While concession applications may be made in these areas, they will almost certainly be declined as they will be inconsistent with the area plan – consistency with the area plan is a requirement for a concession to be approved.
- **White:** pre-assessment is not appropriate and consistency with the land classification or visitor zone will be assessed on a case-by-case basis through the concessions process.

Activity	Land classification												Other***	
	National Parks*	Conservation Parks	Stewardship Areas	Scenic Reserves	Recreation Reserves	Ecological Areas	Nature and Scientific Reserves	Marginal Strips	Wildlife Management Areas	Amenity Areas/Natural character areas**	Historic Reserves	Sanctuary Areas		
% of PCL	34.16	23.78	26.81	4.73	2.62	1.50	1.34	0.6	0.27	0.11	0.07	0.04	3.97	
Recreation and tourism infrastructure and facilities														% of PCL
Unsealed tracks														88.08
Sealed tracks														88.08
Commercial events														88.08
Small tourism facilities (huts, toilets, shelters)														87.48
Campgrounds														87.48
Car parks														53.32
Outdoor education camps														87.48
4WD tracks														53.32
Large tourism facilities														0.11
Grazing, beehives and planting														
Native planting														94.32
Exotic harvest														90.82
Grazing														52.61
Right of way for livestock														53.21
Collection of flora														53.21
Beehives														50.59
Cropping														50.59
Utilities, roading and public infrastructure														
Monitoring														88.71
Wharves														87.48
Bulk fuel storage														87.48
Retaining wall														53.32
Below-ground pipes and cables														53.32
Above-ground masts and cables														53.32
Water supply schemes														53.32
Flood protection														53.32
Roads														53.32
Hydroelectric														50.21

* Pre-assessment does not cover specially protected areas within national parks.

** These refer to amenity areas under the Conservation Act, which the Bill is amending to call natural character areas.

*** Includes local and government purpose reserves (0.54% of PCL), wilderness areas (1.28% of PCL), land administered under the Waitangi Endowment Act (0.01% of PCL), other land held under section 7 of the Conservation Act for conservation purposes (2.14% of PCL).

Table 2: Assessment of activities against visitor zones

Activity	Visitor Zone				
	Amenities Areas/Visitor Amenity Areas*	High Visitor Zone	Medium Visitor Zone	Low Visitor Zone	Wilderness Areas
Recreation and tourism infrastructure and facilities					
Unsealed tracks					
Sealed tracks					
Commercial events					
Small tourism facilities (huts, toilets, shelters)					
Campgrounds					
Car parks					
Outdoor education camps					
4WD tracks					
Large tourism facilities					
Grazing, beehives and planting					
Native planting					
Exotic harvest					
Grazing					
Right of way for livestock					
Collection of flora					
Beehives					
Cropping					
Utilities, roading and public infrastructure					
Monitoring					
Wharves					
Bulk fuel storage					
Retaining wall					
Below-ground pipes and cables					
Above-ground masts and cables					
Water supply schemes					
Flood protection					
Roads					
Hydroelectric					

* These refer to current amenities areas under the National Parks Act, which will be called visitor amenity areas under the Bill.