

Monday 21 December 2020
Via email: otago_cms@doc.govt.nz

Dear Sir/Madam,

RE: DRAFT OTAGO CONSERVATION MANAGEMENT STRATEGY PARTIAL REVIEW FOR CYCLE TRACKS AND TRAILS

Thank you for providing the Glenorchy Trails Trust (GYTT) with the opportunity to give feedback on the draft Otago Conservation Management Strategy (CMS) partial review for cycle tracks and trails. Please note that the GTT was formerly called the Head of the Lakes Trails Trust.

Glenorchy is a unique destination within the Queenstown Lakes District, fast becoming a haven for people who both love outdoor activity and want to enjoy it in a way that minimises their impact upon the environment. It's home to a thriving community with a rich heritage, that regularly welcomes a high number of visitors every year.

The GYTT was established three years ago, to build trails that could be enjoyed by walkers and cyclists, residents and visitors alike. Safe, active travel is central to community wellbeing, emissions reduction and our visitor value proposition. The GYTT's submission is consistent with Glenorchy's community plan to develop "an enviable network of walking and cycling tracks¹". It also fully supports the aspirations of the wider community's vision for the district as outlined in Vision Beyond 2050².

The GYTT supports the inclusion of all of the tracks included in the draft CMS and the equal treatment of e-bikes and traditional bikes. However, one of the critical tracks proposed by the GYTT for mountain bikers at the Head of the Lake has been included in the interactive mapping but omitted from table 2.3 – the Whakaari Single Track. The GYTT requests the urgent inclusion of this track as it is the only potential option for experienced bikers (grades 3-5) to ride off-road both up and down hill in Glenorchy. Whilst Queenstown enjoys a large range of trails with vertical descents, this is the only option for experienced riders within reach of Glenorchy. The inclusion of the Whakaari Single Track will perfectly complement the range of valley floor riding available in the area, truly providing something for everyone – both resident and visitor. The current track is shared with horse-riding and walking and this process provides the perfect opportunity to expand this offering in a safe and well-planned fashion.

The GYTT thanks DoC for its consideration of its initial submission into the process. In the spirit of supportive collaboration, the GYTT has a number of key requests for DoC to consider:

- Urgently include the Whakaari Single Track in Table 2.2.
- Disassociate the addition of trails from the statutory process.
- Ensure that "concerns raised" are based on expertise and evidence.

¹ Section 8 – Infrastructure Vision <https://www.shapingourfuture.org.nz/assets/Glenorchy-Community-Visioning-Forum-Report-Final.pdf>

² <https://www.qldc.govt.nz/media/wgscwzro/qldc-vision-2050-boards-feb19-v2.pdf>

- Ensure a balance of positive and adverse effects are considered in the process, particularly in relation to the outcomes for the place and the wellbeing of its people.
- Simplify the assessment criteria to avoid unnecessary time and expense.
- Recognise the typical process for funding trail development and amend wording accordingly.

The following submission explores the above in more detail and considers a range of further detailed points for your consideration. We would welcome the opportunity to speak to our submission.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'MB' or similar initials, written in a cursive style.

Matt Belcher

Chair, Glenorchy Trails Trust

cc. Trustees – Tom Fleming, Toni Glover, Steve Hewland and Michelle Morss.

Secretary – Kate Garvey

1. Summary

1.1. In summary, the GYTT's position is as follows:

- GYTT **supports all** the tracks indicated on the interactive mapping across Otago, but notes that the Whakaari Single Track has been omitted from table 2.3 and **requests its urgent inclusion**.
- GYTT **requests** that all marginal strips should be considered for assessment criteria, rather than identifying individual parcels for inclusion.
- GYTT has made a number of **recommended changes** to Table 2.3 based upon local knowledge.
- GYTT **opposes** the amendments to Part Three Policies, but has suggested amendments to section 3.3 that would help make the proposed policies more effective and appropriate.
- GYTT is **requesting changes** that will:
 - Disassociate the addition of trails from the statutory process.
 - Ensure that “concerns raised” are based on expertise and evidence.
 - Ensure a balance of positive and adverse effects are considered in the process, particularly in relation to the outcomes for the place and the wellbeing of its people.
 - Simplify the assessment criteria to avoid unnecessary time and expense.
 - Recognise the typical process for funding trail development and amend wording accordingly.

1.2. The following sections explore the GYTT's position in relation to Table 2.3 and Part Three Policy 3.3 in more detail.

2. Feedback - Table 2.3

2.1. Addition requested – Whakaari Single Track

2.1.1. The GYTT proposed the inclusion of the Whakaari Single Track at Mt Judah and requests that this is added to Table 2.3. There is currently no trail provision for experienced riders in Glenorchy and this will provide a grade 3-5 trail, perfectly complementing the existing trails on the valley floor and truly providing something for everyone to enjoy. The current track is shared with horse-riding and walking activity and works well, but the proposed trail will provide a much-needed addition to the existing network in a safe fashion. The integrity of the conservation and heritage values of Whakaari must take priority, but with careful planning the GYTT believes this trail to be of considerable value to residents of and visitors to both Glenorchy and the wider district.

2.2. Conservation Area – Kinloch Foreshore limited to: Kinloch Road only.

2.2.1. Kinloch Road does not traverse this parcel of land so the reference to it is confusing and should be deleted.

2.3. Conservation Area – Mt Creighton: — Proposed tracks subject to future management plan (or other appropriate document) addressing recreation opportunities on this parcel

2.3.1. The GYTT does not support any area being subject to further criteria over and above that in the new policies in Section 3.3 and submits that the last sentence should be deleted. If there are any adverse effects associated with a trail within this area this will be identified and dealt with through the policies proposed in Section 3.3 therefore does not need to be restricted at this stage of the process.

2.4. Conservation Area – Rees River (must avoid braided river ecosystem)

2.4.1. The GYTT is concerned that the “braided river ecosystem” is undefined, and could in fact refer to the entire “Conservation Area – Rees River”. The GYTT requests that the last sentence is deleted, and if not deleted at least revised to clearly define “avoid” and “braided river ecosystem”.

2.4.2. Again, if there are any adverse effects associated with a trail within this area this will be identified and dealt with through the policies proposed in Section 3.3 therefore does not need to be restricted at this stage of the process.

2.5. Diamond Lake and Lake Reid Wildlife Management Reserve limited to: — Diamond Lake (Wakatipu) amenity area access road — Paradise Road — Diamond Creek Track (existing) and Diamond Lake Recreation Reserve (Wakatipu) limited to: — Diamond Lake Road

2.5.1. As can be seen in Fig.1 (where purple denotes public road reserve), restricting access as currently proposed removes the opportunity to utilise the road reserve to access Paradise. The Diamond creek road reserve is by far the GYTT’s preference due to its scenic amenity and its safety compared to using the Paradise Road.

2.5.2. Again, if there are any adverse effects associated with a trail within this area this will be identified and dealt with through the policies proposed in Section 3.3 therefore does not need to be restricted at this stage of the process.

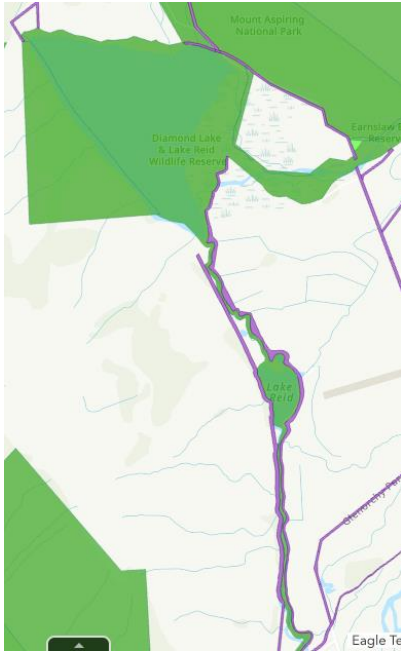


Fig. 1

2.6. Glenorchy Lagoon Wildlife Management Reserve limited to: — Existing track (excluding the Glenorchy Lagoon Walkway)

2.6.1. The GYTT supports the intent to exclude cycling from the boardwalk as it is not feasible to pass other users. However, utilisation of the formed track should be considered. The GYTT intends to extend and upgrade if/where necessary the existing track to access the road reserve to the north shown in Fig 2.

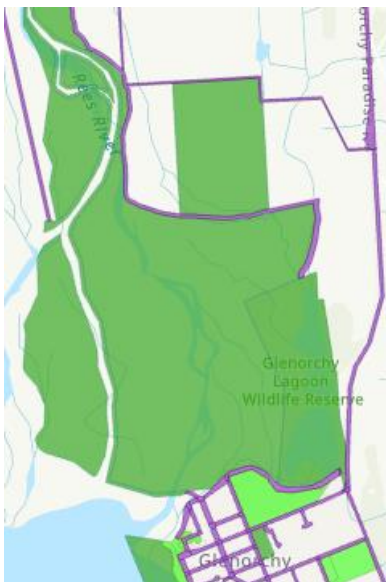


Fig. 2

2.6.2. The GYTT recommends that the wording of this section be revised to reference exclusion from the existing board walk only (not “board walks” in general, as the GYTT may need/want to build one in that area that is appropriately designed for walking and cycling).

2.6.3. Again, if there are any adverse effects associated with a trail within this area this will be identified and dealt with through the policies proposed in Section 3.3 therefore does not need to be restricted at this stage of the process.

2.7. Marginal Strip – Dart River/Te Awa Whakatipu (2800647) excluding: — Paved village site which is of significance to Ngāi Tahu and other areas of cultural significance within this parcel

2.7.1. “Other areas of cultural significance” is extremely vague and requires better definition. Given the recent work undertaken by QLDC in relation to wāhi tūpuna in the district recently, this should be readily available.

2.7.2. Again, if there are any adverse effects associated with a trail within this area this will be identified and dealt with through the policies proposed in Section 3.3 therefore does not need to be restricted at this stage of the process.

3. Feedback - Part Three Policy - 3.3

3.1. As part of the CMS review, DoC has proposed to amend Policy 3.3.4 and add policies 3.3.5-3.3.8. However, these changes are not (in the main) supported by the GYTT and the wider trails community.

3.2. Therefore, the GYTT encourages DoC to:

- i. Remove all additional policy detail within this section, retaining only 3.3.4
- ii. Amend 3.3.4 to remove the statutory review clause
- iii. Maintain the existing assessment criteria with no addition to policies 3.3.5 – 3.3.8

3.3. However, should DoC continue with the proposed policies, at a minimum the GYTT urges the consideration of the following key requests:

- Disassociate the addition of trails from the statutory process.
- Ensure that “concerns raised” are based on expertise and evidence.
- Ensure a balance of positive and adverse effects are considered in the process, particularly in relation to the outcomes for the place and the wellbeing of its people.
- Simplify the assessment criteria to avoid unnecessary time and expense.
- Recognise the typical process for funding trail development and amend wording accordingly.

Each of these requests is explored in detail in the table below, offering suggested amendments.

Detailed Amendments

Section	Key Request	Recommendation	Reason
3.3.4a and the top of all part two tables	Disassociate the addition of trails from the statutory process.	<p>Delete 3.3.4a ““follow the statutory amendment or review process”</p> <p>Either insert:</p> <p>“The list is accurate as at the date of approval of this CMS. Its contents may be amended or reviewed or updated during the term of this CMS as detailed in 3.3.4 [3.3.4 required to be updated].”</p> <p>Or:</p> <p>Relocate a list of trails that are not yet approved from construction to an updatable appendix to the CMS. Add the following to the beginning of the new appendix: “The list is accurate as at the date of approval of this CMS. Its contents may be amended, reviewed or updated during the term of this CMS as detailed in 3.3.4 [3.3.4 required to be updated].”</p>	Linking the addition of cycle trails to a statutory process is a costly and time consuming process. Identifying a suitable method for trails to be added under an alternative (yet rigorous) process would result in better outcomes for DoC, interest groups and the wider community.
Policy 3.3 and 3.3.6	Ensure that concerns raised are based on expertise and evidence.	<p>Delete all occurrences of the words ‘concerns raised’ within the rewritten policies in Part Three.</p> <p>And: Amend 3.3.6: implementing mechanisms to manage the adverse effects of concerns raised, including compliance with the latest version of the Department’s cycle trail standards, <u>or commonly accepted national trail design guides</u>.</p>	‘Concerns raised’ is exceptionally vague, without definition in either the CMS glossary or the Conservation Act. Without closing avenues for community voice, an alternative needs to be identified, that requires some form of evidence based-approach or demonstration of expertise. The recommended amendment to 3.3.6 would help to address this.
3.3.4 c(i) and 3.3.5j	Ensure a balance of positive and adverse effects are	Amend 3.3.4c(i): “...which may require considering <u>the balance of positive and</u> adverse effects (including cumulative effects) of the activity on natural, historic, and	The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive concerns are absent.

	considered in the process, particularly in relation to the outcomes for the place and the wellbeing of its people.	cultural values and other recreational users can be enhanced / avoided, remedied or mitigated; And: Add to 3.3.5j: <u>“The positive effects on the purpose and outcomes for the place and the wellbeing of its people.”</u>	GYTT requests that these are taken into account and related to broader wellbeing in these two clauses.
3.3.5	Simplify the assessment criteria to avoid unnecessary time and expense.	Reject additional 3.3.5 assessment criteria a)-i) and maintain 3.3.4 c with the amendment outlined above Or: Amend 3.3.5 to <i>“May consider the following criteria where appropriate, when <u>assessing</u> whether to develop or allow a new cycle trail ...”</i>	The extension of the assessment criteria increases the risk of the process becoming bureaucratic. The GYTT recommends that this is simplified through the retention of the existing criteria or through the application of 3.3.4c to avoid this. Alternatively, the assessment could be made informal and optional (as per the amendment suggested). If the criteria must be amended, a focus on the four wellbeings of social, cultural, environmental and economic wellbeing of our communities is recommended.
3.3.5i	Recognise the typical process for funding trail development and amend wording accordingly.	Amendment requested: “if the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated.	It is often the case in small and community-led cycle trail projects that funding is sought after land access and approval is gained. To require all funding to be secured in the initial planning stage is typically unfeasible. The suggested amendment would address this concern.