

Tuia Pito Ora New Zealand Institute of Landscape Architects

Submission on the Conservation Amendment Bill 2026

1 July 2026

1.0 INTRODUCTION

- 1.1 Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA) welcomes the opportunity to submit on the Conservation Amendment Bill 2026.
- 1.2 NZILA is the professional body representing approximately 700 landscape architects in Aotearoa New Zealand. Our members work across landscape planning, design, conservation management, infrastructure, recreation planning, urban development and environmental assessment. Landscape architects are regularly involved in the assessment and management of public conservation land, including National Parks, stewardship land, reserves, coastal environments, river corridors and culturally significant landscapes.
- 1.3 Accordingly, NZILA has a direct interest in legislative changes that influence how conservation landscapes are protected, managed and experienced.
- 1.4 NZILA supports efforts to improve the effectiveness and efficiency of the conservation system. We recognise the importance of enabling appropriate recreation, tourism and public access opportunities within the conservation estate. However, we consider that several aspects of the Bill represent a significant shift in the management of public conservation land and have the potential to result in unintended consequences for landscape values, cultural landscapes and visitor experience.
- 1.5 This submission focuses specifically on the landscape implications of the proposed amendments.
- 1.6 Landscape is more than scenery or visual amenity. It encompasses the natural and physical environment, ecological systems, cultural and historical associations, and the ways in which people experience, value and connect with place. Landscape therefore provides an integrated framework for understanding the relationships between people, whenua and the environment, and how these relationships are affected by change. *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (2022)*, developed by NZILA, provides New Zealand's nationally recognised framework for understanding and assessing landscape. The guidelines establish a consistent, effects-based approach to landscape assessment, grounded in Aotearoa New Zealand's unique environmental, cultural and bicultural context.

2.0 EXECUTIVE SUMMARY

- 2.1 NZILA considers that the Conservation Amendment Bill is a significant shift in the management framework for public conservation land, waters and indigenous flora and fauna.
- 2.2 The Bill introduces a strong emphasis on enabling economic opportunities, streamlines concession processes, increases flexibility around land exchange and disposal, and centralises aspects of conservation planning and decision-making. While these changes are intended to improve efficiency and certainty, they have the potential to alter how conservation landscapes are understood, assessed and managed, and therefore how they are experienced.
- 2.3 From a landscape perspective, the key issue is not always the effect of any single development, tenure change or activity but is more often the cumulative and incremental change that may occur over time as development, infrastructure and commercial activities become more disruptive within the conservation estate. NZILA is concerned that landscape values, cultural landscapes and cumulative landscape effects are not adequately recognised within the proposed framework. We are also concerned that greater reliance on nationally directed processes may reduce opportunities for place-based decision-making and landscape-specific assessment.
- 2.4 NZILA therefore seeks amendments to ensure that landscape values remain a central consideration in decisions affecting public conservation land.

3.0 THE IMPORTANCE OF LANDSCAPE WITHIN AND ASSOCIATED WITH THE CONSERVATION ESTATE

- 3.1 The conservation estate contains Aotearoa New Zealand's most valued and recognisable landscapes. These include mountain ranges and basins, forests, tussock lands, wetlands, coastlines, river systems, volcanic landscapes and places of cultural significance. Tongariro National Park. Aoraki Mount Cook. Taranaki Maunga. The Southern Alps. Fiordland. Rakiura - Stewart Island. The Mamaku - Kaimai - Coromandel Range. The Tasman Mountains. Waikaremoana.
- 3.2 These landscapes contribute to New Zealand's unique identity, sense of place, distinctiveness and international reputation. They provide opportunities for recreation and tourism, support ecological processes and biodiversity, quality and quantity of water yield, and hold deep cultural and spiritual significance for tāngata whenua and local communities.
- 3.3 Importantly, the economic value generated through recreation and tourism is fundamentally dependent on the continued protection and careful management of these landscapes. Visitors are not attracted by facilities and infrastructure, but by the natural character, scenic quality, cultural meaning and experiential qualities of the places they visit.
- 3.4 Landscape is therefore more than a visual resource. It is the interaction of natural, cultural, ecological and experiential values that collectively create the character and identity of place.

- 3.5 NZILA considers that landscape values should be recognised and require explicit consideration in the management of public conservation land.

4.0 LANDSCAPE IMPLICATION 1: A SHIFT IN THE PURPOSE OF CONSERVATION LAND

- 4.1 NZILA considers that one of the most significant aspects of the Bill is the introduction of provisions that require the Department of Conservation to recognise economic opportunities associated with conservation land and *enable those opportunities to the greatest extent practicable*.
- 4.2 Historically, conservation legislation has been primarily directed toward the protection and management of conservation values. Recreation, tourism and commercial activities have been provided for where they are compatible with those values.
- 4.3 The proposed amendments introduce a broader management approach in which economic opportunities become the central consideration in decision-making.
- 4.4 NZILA acknowledges that recreation and tourism are important uses of the conservation estate and contribute significantly to regional economies. However, the qualities that support these activities are themselves dependent on the protection of landscape character, natural character and cultural values.
- 4.5 The Institute is concerned that the proposed framework will shift decision-making from asking whether development is appropriate within a particular conservation landscape to determining how development can be accommodated within that conservation landscape. This is a fundamental change in emphasis, prioritising the modification of valued conservation landscapes to enable development or use, rather than ensuring that development is compatible with, and does not compromise, the landscape values that warrant their protection.
- 4.6 While this may appear a subtle change in wording, it has the potential to significantly influence decisions regarding tourism infrastructure, visitor facilities, accommodation, transport infrastructure and other concession-based activities that may adversely impact the reasons why the conservation landscape is valued by visitors and New Zealanders including tāngata whenua.
- 4.7 NZILA considers that conservation should remain the primary purpose of public conservation land, waters, flora and fauna, and that economic use should remain subordinate to the protection of conservation values.
- 4.8 Accordingly, NZILA recommends that the Bill be amended to explicitly recognise landscape values and cultural landscapes as matters to be considered when exercising functions and powers under the Act.

5.0 LANDSCAPE IMPLICATION 2: LANDSCAPE ASSESSMENT AND DECISIONS AFFECTING CONSERVATION LAND

- 5.1 The Bill proposes greater flexibility regarding land exchange, disposal, reclassification and the establishment of visitor amenity areas.

- 5.2 These decisions have the potential to permanently alter the character and composition of the conservation estate. NZILA acknowledge that there may be some areas that merit land exchange, disposal, reclassification and the establishment of visitor amenity areas, however the Bill does not currently require a comprehensive assessment of landscape values before such decisions are made.
- 5.3 Landscape values are often not adequately reflected through existing land classifications. This is particularly relevant in relation to stewardship land, where important landscape, cultural and ecological values may not yet be comprehensively identified or documented.
- 5.4 NZILA considers that robust decision-making requires a clear understanding of the values present before land is exchanged, disposed of, reclassified or subject to more intensive use.
- 5.5 Landscape assessment is a well-established professional methodology that assists decision-makers to understand landscape character, natural character, cultural landscape values, visual amenity, landscape resilience and landscape sensitivity to change. It provides an evidence-based foundation for understanding the implications of proposed changes and identifying appropriate landscape management responses.
- 5.6 NZILA therefore recommends that the Bill require an assessment of landscape and cultural landscape values prior to decisions involving land disposal, land exchange, reclassification or significant intensification or scale of use.
- 5.7 Such assessments should be undertaken by suitably qualified professionals and should form part of the information available to decision-makers.

6.0 LANDSCAPE IMPLICATION 3: CUMULATIVE EFFECTS AND THE CONCESSIONS FRAMEWORK

- 6.1 NZILA supports efforts to improve the efficiency and certainty of concession processes. However, we are concerned that the proposed framework places insufficient emphasis on cumulative effects.
- 6.2 Adverse landscape effects are rarely the result of a single activity. Rather, they occur incrementally through the combined effects of visitor facilities, accommodation, commercial recreation activities, access roads, transport infrastructure and associated development and context management.
- 6.3 Individually, these activities may appear appropriate and manageable. Collectively, however, they can alter the character of landscapes and the experiences they provide. This is particularly important in landscapes valued for their naturalness, remoteness, scenic quality, cultural significance and/or sense of wildness.
- 6.4 Once these qualities are diminished, they can be difficult or impossible to restore.
- 6.5 NZILA considers that cumulative effects represent one of the most significant landscape risks arising from the proposed reforms. While streamlining concession processes may improve efficiency, it should not occur at the expense

of understanding how multiple activities interact over time to influence landscape values of conservation land.

- 6.6 NZILA therefore recommends that cumulative effects on landscape character, natural character, cultural landscape values and visitor experience be expressly considered when determining concessions, establishing visitor amenity areas and assessing significant development proposals on conservation land.

7.0 LANDSCAPE IMPLICATION 4: CULTURAL LANDSCAPES AND PLACE-BASED DECISION MAKING

- 7.1 Landscape is not solely a biophysical resource. It reflects the relationships between people and place, including cultural, historical, spiritual and ancestral associations. Many landscapes within public conservation land derive their significance from these relationships.
- 7.2 NZILA supports giving effect to the principles of Te Tiriti o Waitangi. NZILA also supports the meaningful involvement of mana whenua in decisions affecting public conservation land. Treaty principles are not satisfied through consultation alone but require a partnership-based approach in which tāngata whenua values, mātauranga, and relationships with whenua are integrated into decision-making.
- 7.3 The proposed section 4A seeks to clarify how Treaty obligations are addressed through consultation and engagement processes. While greater clarity may be beneficial, NZILA notes that the effectiveness of these provisions will ultimately depend on the extent to which tāngata whenua can meaningfully influence outcomes rather than simply participate in process.
- 7.4 Similarly, the move toward nationally directed planning frameworks and standardised decision-making pathways has the potential to reduce opportunities for local knowledge and landscape-specific understanding to inform decisions.
- 7.5 Conservation landscapes are inherently place-based. The values that make a landscape important are often rooted in local character, history, ecology and community connection, and cannot always be adequately recognised through nationally applied frameworks. While national direction provides consistency, it cannot capture the finer-grained qualities that give places their meaning, such as the knowledge of a hidden valley, the seasonal rhythms of a wetland, or the cultural significance of a particular river reach. These locally distinctive attributes are fundamental to landscape identity and are best understood by those with intimate knowledge of the place. The Bill should therefore retain sufficient flexibility for local decision-making to recognise and respond to the unique characteristics and values of individual conservation landscapes.
- 7.6 Effective conservation management requires an understanding of local landscape character, cultural associations, community values and environmental context.
- 7.7 NZILA therefore supports retaining a meaningful role for Conservation Boards, mana whenua and local communities in shaping decisions affecting conservation landscapes.

7.8 The NZILA also recommends that cultural landscapes, mātauranga Māori and landscape-scale relationships, including ki uta ki tai connections, be explicitly recognised within the conservation management framework.

8.0 RECOMMENDATIONS

8.1 NZILA recommends that the Environment Committee amend the Bill to:

- a) Explicitly recognise landscape values and cultural landscapes as conservation values requiring consideration under the Act.
- b) Confirm that conservation remains the primary purpose of public conservation land and that economic use and development is subordinate to conservation outcomes.
- c) Require assessment of landscape and cultural landscape values and their contribution prior to land disposal, exchange, reclassification or significant intensification or scale of use. Such assessments should also inform regional spatial planning to ensure that future growth and infrastructure decisions recognise and respond to the long-term protection of conservation landscapes.
- d) Require cumulative effects on landscape character, natural character, cultural landscapes and visitor experience to be considered when determining concessions and other development approvals.
- e) Recognise landscape-scale relationships, including ki uta ki tai connections, as relevant considerations in conservation planning and management.
- f) Retain meaningful opportunities for input from mana whenua, Conservation Boards, local authorities and communities when decisions affect conservation landscapes.

8.2 NZILA considers that the recommendations above are fundamental to ensuring the Bill appropriately recognises and protects the landscape, cultural and experiential values of New Zealand's public conservation lands. Unless these recommendations are collectively incorporated, NZILA cannot support the Bill in its current form, as it risks undermining the primary purpose of conservation and weakening the long-term protection and management of conservation landscapes.

9.0 CONCLUSION

9.1 NZILA supports the objective of improving the effectiveness and efficiency of conservation management.

9.2 The conservation estate contains Aotearoa New Zealand's most significant and valued landscapes. These landscapes underpin ecological, cultural, recreational and economic outcomes and contribute substantially to New Zealand's identity and wellbeing.

9.3 The Bill introduces changes that collectively move the conservation estate toward a more development-enabled framework. Without appropriate safeguards, there

is a risk that incremental and cumulative landscape change will erode the qualities that make conservation landscapes valuable in the first place.

- 9.4 NZILA therefore seeks amendments to ensure that landscape values, cultural landscapes, cumulative effects and place-based decision-making remain central considerations in the management of public conservation land.
- 9.5 NZILA wishes to appear before the Committee to speak to this submission.

Submission authors

This submission was prepared by the Environmental Legislation Committee working group¹ of Tuia Pito Ora NZILA, after seeking contributions from our wider membership. It was ratified by the Board of Tuia Pito Ora NZILA on 30 June 2026.

Ralph Johns - President

Tuia Pito Ora New Zealand Institute of Landscape Architects Incorporated

P.O. Box 10-022 The Terrace, Wellington 6140

Email: admin@nzila.co.nz - Phone: 0800 843 694

www.nzila.co.nz

¹The following members contributed to this submission: Julia Wick (lead author), Ben Ormsby (Te Tau-a-Nuku), Brad Coombs, Bridget Gilbert, Clive Anstey, Dennis Scott, Di Lucas, Nigel Parker, Peter Kensington (chair), Rachael Annan, Rhys Girvan, Stephen Quin, Simon Button (Board representative).