

Tuia Pito Ora New Zealand Institute of Landscape Architects

Submission on Proposed National Conservation Policy Statement

10 August 2026

1.0 INTRODUCTION

- 1.1 Tuia Pito Ora New Zealand Institute of Landscape Architects (**NZILA**) welcomes the opportunity to submit on the Proposed National Conservation Policy Statement.
- 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 (including protected marine areas and biota), 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 This submission focuses on the landscape implications of the Proposed National Conservation Policy Statement. NZILA has also made a related submission¹ on the Conservation Amendment Bill.
- 1.5 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 and the proposed policy statement represent a significant shift in management of public conservation land and have the potential to result in unintended consequences for landscape values, cultural landscapes and visitor experience. Accordingly, NZILA has a direct interest in legislative changes that influence how conservation landscapes are protected, managed and experienced.
- 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.
- 1.7 *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (Te Tangi a te Manu)* (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.

¹ Dated 2 July 2026

- 1.8 The character and quality of our landscapes derive from their unique biophysical attributes, the ways in which they are perceived, and for their associative values, or values for those with established relationships with a place. Landscape management requires the recognition of and respect for established relationships (biological and cultural), and their protection and enhancement. For the purpose of our submission, we use the term 'Landscape Values' as a catch all. We also provide a glossary of relevant terms at the end of our submission.
- 1.9 NZILA supports a more effective and efficient conservation system. We note, however, that the visitor and tourism value the reforms seek to grow depends directly on the quality, distinctiveness and cultural integrity of the landscapes people come to experience. Decisions that overlook landscape and cultural values do not only diminish conservation outcomes; they degrade the asset that underpins the visitor economy, and risk costly and sometimes irreversible loss. Recognising landscape values well is therefore a means of securing the reforms' economic goals, not a brake on them. We develop this point through the responses below.
- 2.0 RESPONSE TO SPECIFIC QUESTIONS WITHIN THE PROPOSAL DOCUMENT
- 2.1 The following outlines our response to each of the sixteen questions that have been posed within the [undated] proposal discussion document which outlines the possible topics and likely content of the first National Conservation Policy Statement.

DIRECTING CONTENT OF AREA PLANS

Question 1:

Is there additional content you believe should be included or removed within area plans?

Our response:

While proposed **policies 10–15** require area plans to include summary descriptions of landscapes, cultural heritage and places of significance to tangata whenua, these descriptions should also include identification of the specific **values** that exist, in order to assist with decision making and to ensure that appropriate activity occurs in response to identified values.

The proposed policies also do not require identification, protection or enhancement of cultural landscapes or tangata whenua relationships with place.

Area plans should be required to:

- i. Identify cultural landscapes and tangata whenua values.
- ii. Describe whakapapa relationships between tangata whenua and places.
- iii. Identify places where mauri, kaitiakitanga, wāhi tapu, wāhi tūpuna and other cultural associations contribute to landscape values of that place.
- iv. Include objectives for the protection, restoration and enhancement of natural and cultural landscapes.
- v. Include landscape management outcomes developed in partnership with tangata whenua.

The proposed requirement for concise summaries, risks reducing landscape to a physical inventory of landforms and natural features. Area plans should retain the ability to include place-specific landscape objectives and policies, where necessary, to recognise local landscape character, values and cultural associations for both terrestrial and marine environments.

Identifying the specific values present is not additional process for its own sake. Area plans that record values clearly enable faster, more consistent and more defensible consenting decisions later, directly serving the efficiency the reforms seek.

We recommend that proposed **policy 14** be amended as follows:

*Area plans ~~may~~ must include a summary of known indigenous species, habitats, ecosystems, landscapes, landforms, and geological features and describe where these are known to also exist **outside of** conservation land and marine areas administered by the Department.*

This policy is important to ensure the relationship between public conservation land and the wider regional landscape when seeking coherent and comprehensive resource management.

Landscape values do not stop at the boundary of the conservation estate. Effects on and from adjoining land shape the integrity of conservation landscapes, and these interface relationships cannot be managed from within the boundary alone. Recording where values continue beyond the estate is therefore necessary for decisions that hold up in practice.

We also question how area plans will relate to spatial planning under the Planning Act and the Natural Environment Act [as currently proposed in the two bills] and we support the concerns raised by the New Zealand Planning Institute on this matter, as set out in their submission². We strongly recommend an alignment between 'Area Plans' and 'Spatial Plans', both in the language used and in the mapping formats, which would better align intent and application.

Question 2:

Do you have views on any transitional policies for area plans that should be considered?

Our response:

It will be important to ensure that the process of preparing area plans is not rushed and that all existing relevant information within existing policy, strategy and management plan documents is not lost.

A process which enables people to submit on draft area plans should also be set up, so that members of the public (outside the Department of Conservation organisation) can contribute local knowledge and information (some of which has been compiled over many years) which can be included within the new generation of area plans, rather than reinventing the wheel.

VISITOR ZONES

Question 3:

Do you have any feedback on the proposed approach to developing visitor zones?

² Dated 2 July 2026

Our response:

The visitor zone framework is heavily focused on recreation, tourism and visitor experience attributes such as access, infrastructure, solitude, noise and visitor numbers. It does not adequately recognise cultural landscape values or tangata whenua relationships with place. Visitor zones should not be determined solely by recreation outcomes because such an approach risks overlooking cultural landscape values in places that are culturally significant, despite having relatively low biodiversity or visitor use values, for example.

All visitor zones need to recognise and provide for existing biodiversity values and related ecosystems as well as any established cultural relationships and activities; in addition, being conscious of impacts on naturalness, experiential values and the distinctiveness of a place.

The existing character and quality of established relationships must be afforded protection in order to maximise the value of the visitor experience over time. Failure to identify place-based values effectively and design a responsive and well-integrated visitor experience, risks deterioration of the landscape values that draws visitors in the first place.

Zoning driven by recreation and visitor metrics alone also risks eroding the cultural depth and distinctiveness that give these places their standing, and their premium visitor value. A place stripped of the associations that make it significant is a lesser visitor experience, not greater.

EXEMPT ACTIVITIES

Question 4:

Do you have feedback on any of the activities proposed for exemption from requiring a permit, and should we consider any others?

Our response:

Allowing some activities to be exempt from consent needs, and others pre-approved, makes sense from an administrative point of view, however, there may need to be conditions to manage the effects of an activity in the particular place or setting.

In our view all consenting processes must provide an opportunity to impose conditions appropriate to the particular setting. The process of exploring the need for conditions should also consider any cumulative effects. We have a concern over how potential cumulative effects on landscape values will be addressed, as a result of wholesale exemptions where no opportunity arises for such an assessment to be made.

Wholesale exemptions remove the one point at which cumulative effects can be caught. Landscape values are rarely lost to a single decision; they are lost incrementally, across many small approvals that no single assessment ever sees together. Without a means to consider cumulative effect, the system risks degrading the visitor asset and experience by increments.

Question 5:

Are there other conditions you think should be included or removed for these exempt activities?

Our response:

We have no comment to make on this question.

PRE-APPROVED ACTIVITIES

Question 6:

Do you have feedback on any of the activities proposed for pre-approval, and should we consider any others?

Our response:

We have no comment to make on this question.

Question 7:

Are there other terms and conditions you think should be included or removed for these pre-approved activities?

Our response:

We have no comment to make on this question.

AREAS WHERE PRE-APPROVED AND EXEMPT ACTIVITIES DO NOT APPLY

Question 8:

Are there areas where you believe exempt and pre-approved activities should not apply? Please describe the area(s) in detail and the significant adverse effects on natural, cultural, or historic values, and why adverse effects cannot be avoided or mitigated.

Our response:

Exempt and pre-approved activities should not apply where they would harm natural, cultural or historic values that cannot be adequately protected. The examples below are cultural, but the reasoning extends to natural and historic values.

For example, the NCPS should exclude exempt and pre-approved activities from culturally significant landscapes, including areas containing:

- Wāhi tapu.
- Wāhi tūpuna.
- Cultural landscapes recognised by tangata whenua.
- Areas subject to Treaty settlement acknowledgements, or similar cultural recognition.
- Areas where tangata whenua identify significant cultural associations or values.

The proposed framework recognises the possibility of excluding activities where significant adverse effects on cultural values may occur. However, cultural landscapes are often not formally mapped and their significance may not be readily apparent to applicants.

Either there is a requirement for identification of cultural landscape areas through a mapping approach referenced by the NCPS or engagement with tangata whenua should be required.

Protecting these places from blanket exemption is not only a conservation safeguard. They are among the settings that give the conservation estate its distinctiveness and its value to visitors; their degradation is a direct loss to the visitor economy, and often an unrecoverable one.

Question 9:

What costs and benefits do you see in not applying pre-approved and exempt activities in specified locations?

Our response:

Requiring proportionate assessment for activities in specified locations may increase administrative effort and costs. However, these costs are outweighed by the benefit of ensuring activities are appropriately assessed against identified place values, helping protect significant natural and cultural landscape values and the visitor experiences they support. Any use of exempt activities should be carefully monitored to ensure adverse and cumulative effects do not erode these values over time.

Activities with Standardised Pre-Assessment

Question 10:

Do you have feedback on any of the activities proposed for standardised pre-assessment?

Our response:

The standardised pre-assessment framework appears to rely primarily on land classification and visitor zones. This approach does not adequately account for landscape values, cultural landscapes or tangata whenua relationships with place. Standardised pre-assessment should consider potential cumulative effects on landscape and cultural associations.

Question 11:

Do you know of any other commonly undertaken activities on PCL which should be included in the list of activities?

Our response:

We have no comment to make on this question.

Policies for the Management of Specific Activities

Question 12:

Are there other management matters we should consider for one (or more) of these activities?

Our response:

Utilities, roading and public infrastructure, if located, designed or managed inappropriately, can result in unintended or inappropriate consequences on landscape values, including those valued for the 'visitor experience'. The location and design of such infrastructure, if required,

should go through a design review process, with evidence provided that confirms the works will maintain and/or enhance existing landscape values of the specific place.

Design review of this kind is a cost-avoidance measure rather than a hurdle. Infrastructure that is poorly sited or designed degrades the setting it occupies, invites later remediation or removal, and diminishes the visitor value of the place. Getting it right once is cheaper, and more durable, than correcting it later.

Question 13:

Is there any additional feedback relating to these activities you wish to provide?

Our response:

The proposed framework generally assumes that activities can be managed through standard conditions. However, landscape values are often highly context-specific and dependent on place, cultural associations and distinct local experiential qualities. A nationalised and streamlined consent framework should not come at the expense of recognising place-based landscape values, which often requires careful assessment and design advice to ensure an appropriate outcome for that particular location and proposal, while providing for appropriate activities to occur. This also helps ensure more enduring landscape outcomes.

Question 14:

Should any other activities be managed by the NCPS?

Our response:

The NCPS should integrate climate change considerations in the planning and concession system.

For example, giving consideration to: aerial access and observation; isolated infrastructure to enable remote access and/or management; and hazard reduction and management – such as addressing increasing wildfire, storm events, sea level rise, pest and disease invasion, in a changing world should be included in the planning and concession system to protect and mitigate risks to human health and safety, biodiversity values and asset management.

Exemption from District Land Use Consents

Question 15:

Are there other activities you think should be included in the non-exhaustive list (noting the activities must meet the requirements of the RMA section 4(3) exemption)?

Our response:

We have no comment to make on this question.

POLICIES FOR LAND RECLASSIFICATION

Question 16:

Is there any feedback you wish to provide regarding these reclassification policies?

Our response:

Mineral exploration

Paragraph 65(e) directs that areas with “*significant known mineral deposits or energy opportunities with commercial potential and which are economically viable for extraction*” are to be excluded from consideration.

This provision is inconsistent with the Bill’s stated emphasis on protecting conservation values. Conservation land classification should clearly signal the values to be managed, not the potential for exploitation by exclusion. Any mining should be subject to the constraints of the true land classification.

National Parks and Specially Protected Areas – need for clarification

While the reclassification policies appear to be largely carried over from existing policies, there is confusion over the relative significance of the various classes of conservation land. National Parks are assumed to have the ‘highest’ status, a status associated with certain attributes:

57. *Lands recommended for national park status will contain, **for their intrinsic worth and for the benefit, use and enjoyment of the public**, the following:*
- a. *scenery of such distinctive quality that its preservation in perpetuity is in the national interest; or*
 - b. *ecosystems or natural features so important that their preservation in perpetuity is in the national interest.*

This reflects the traditional perception of National Parks as offering high-quality experiences for visitors and tourists. While indigenous biodiversity and ecosystems values may be high, this is not listed as a criteria in assessing areas for possible National Park status.

The reclassification section does however provide for ‘Specially Protected Areas’:

68. *Specially protected areas may be established to preserve indigenous species, habitats and ecosystems, natural features, or sites and objects of archaeological or historical and cultural interest of such significance that **public access should be controlled**.*

We would expect all conservation land to satisfy this set of criteria and be subject to controlled public access. We anticipate that all conservation land is held in public ownership because it has significant Indigenous biodiversity and natural ecosystem values.

Conservation land has historically been managed for a range of purposes which are reflected in the various land classifications. Any reclassification policy should be clear in what it is attempting to signal, more secure biodiversity, improved access for various activities, or both.

We also note that Conservation Boards and the National Conservation Authority are responsible for overseeing the establishment of or addition to a National Park. This is carried over from the existing policy.

We recommend that the reclassification policies state clearly what each classification is intended to secure, whether biodiversity protection, managed public access, or both, so that classification signals the values to be managed rather than leaving this to inference. We further recommend that responsibility for reclassification to Specially Protected Areas rest with the

Conservation Boards and the New Zealand Conservation Authority, as it does for National Parks, and that area plans be aligned with these decisions to support consistency.

As currently drafted, the Conservation Amendment Bill is inconsistent in emphasising the primacy of protecting conservation values in some sections, while promoting recreation and tourism in others. Such confusion appears to have crept into the section of the proposed National Conservation Policy Statement dealing with the establishment of, or additions to, National Parks.

3.0 OTHER RELATED SUGGESTIONS – GLOSSARY TERMS

3.1 In addition to the above responses, we suggest the following terms, as defined in the glossary of Te Tangi a te Manu, should be included in the Glossary of the NCPS.

- a. **Landscape:** Landscape embodies the relationship between people and place. It is the character of an area, how the area is experienced and perceived, and the meanings associated with it. **Landscape character:** Each landscape's distinctive combination of physical, associative, and perceptual attributes. **Landscape attributes:** Characteristics and qualities (tangible and intangible) that contribute collectively to landscape character. **Landscape values:** The reasons a landscape is valued. Values are embodied in certain attributes.
- b. **Natural character:** An area's distinct combination of natural characteristics and qualities, including degree of naturalness.
- c. **Naturalness:** The extent to which natural elements, patterns, and processes occur. The extent to which an area is unmodified.

3.2 NZILA also acknowledges the value of the currently proposed definition of natural character in the discussion document (as set out in the glossary, at page 29). It's explicit reference to ecological, physical, spiritual and aesthetic qualities recognises that natural character extends beyond a place's biophysical form. We support retaining the breadth of that definition, and read 'aesthetic' as denoting the perceptual, and engaging all senses, not sight alone.

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Submission authors

This submission was prepared by the Environmental Legislation Committee working group³ of Tuia Pito Ora NZILA, after seeking contributions from our wider membership.

It was ratified by the Board of Tuia Pito Ora NZILA on 7 August 2026.

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