

Further comment on proposed car park pricing To the Department of Conservation

25 August 2025

Tēnā koutou

Introduction

1. Herenga ā Nuku Aotearoa, the Outdoor Access Commission, is the Crown agent responsible for providing leadership on outdoor access issues. Our role is to advise on and advocate for free, certain, enduring, and practical access to the outdoors.
2. Our purpose derives from s3 of the Walking Access Act 2008 to provide the New Zealand public with free, certain, enduring, and practical access to the outdoors (including around the coast and lakes, along rivers, and to public resources) so that the public can enjoy the outdoors.
3. Our submission opposes charging New Zealand residents for access to any public conservation areas, including national parks.
4. However, we acknowledge that charging for incidental amenities on public conservation land, such as huts, campsites, and carparks, *maybe* appropriate in *some* circumstances.

Existing legislation stipulates free public access

5. As noted in the first consultation document, the Conservation Act 1987, National Parks Act 1980 and Reserves Act 1977 do not allow charging for access.
6. Further, the purpose of the Walking Access Act 2008 (Section 3) is to provide the New Zealand public with free, certain, enduring, and practical access to the outdoors (including around the coast and lakes, along rivers, and to public resources) so that the public can enjoy the outdoors.
7. Similarly, the first of the New Zealand Conservation Authority (NZCA) Walking Access Principles (2022) is that there should be free, certain, enduring, and practical walking access to public conservation land.
8. Barriers to accessing conservation land can include limited transport, financial obstacles, or a lack of nearby public conservation land. These barriers do not affect all communities equally. Lack of access to nature can create a barrier to the health and wellbeing benefits of spending time in nature.

Herenga ā Nuku Aotearoa, Outdoor Access Commission

Level 12, Majestic Centre
100 Willis Street
Wellington 6011
[Herengaānuku.govt.nz](https://herengaanu.govt.nz)

9. In many cases, an access charge will limit the freedom of some New Zealand residents to access conservation land because they cannot afford the charge. Access to the outdoors, including public conservation, is one of the few outdoor recreation resources universally available to everyone, regardless of financial circumstances.

The value of free access

10. Herenga ā Nuku is concerned that charging for access at Punakaiki, Franz Josef and White Horse Hill is effectively charging for access to those areas. Most visitors to those sites will need to use those car parks, and thus paying for parking means they are paying to use the tracks that start at and around the car parks.
11. While a small annual charge is proposed for some residents to use the car parks, Herenga ā Nuku is concerned that charging residents for access to public land may set a precedent that would impact other public access rights, whether at many other car parks managed by DOC or those provided by councils to esplanade reserves and esplanade strips and other public access areas.
12. Hokitika residents (Westland District) are probably much more likely to visit Punakaiki than Franz Josef, so if visiting the glaciers or visiting Punakaiki, the reduced annual parking charge for locals should be available for all West Coast residents. With the various mountain passes separating the region from the rest of the South Island, we would like to see 'local' resident mean West Coasters rather than being divided by District. Ideally, this pass would be obtained simply and for free.
13. Herenga ā Nuku acknowledges that charging for parking at high-use, iconic sites where there are no other realistic options is the logical way to conduct a trial. However, we are concerned about effectively charging for access to the most popular areas and, if adopted, about the likelihood that visitors will be paying for parking all around the country, with costs mounting for visitors already paying the International Visitor Conservation and Tourism Levy. Ideally, access to public conservation land would remain free, certain, enduring, and practical. That includes avoiding charging where the charge is effectively a charge for entry into that area of National Park through this trial.
14. While speculative, we have concerns for the future. We know that around 76% of visitors to Aotearoa New Zealand come for the landscapes and scenery. DOC will largely manage those landscapes. Looking beyond the proposed trial, if it were to be extended to dozens of popular sites, and if those international visitors averaged a two-hour stay and therefore incurred a \$10 charge to park at each of those sites, they might cover 50 sites during their OE to New Zealand, which would add up to \$500. We do not believe this is the direction of travel DOC is seeking. That approach could be better suited for those visitors through an annual DOC pass that would allow parking at all DOC car parks and, for example, include park and ride bus services that are being considered for congested sites. An example of this is the entrance pass system for US national parks with annual passes (US\$80) and various discounts – free for U16, those with permanent disabilities and volunteers, heavy discounts for 62+ seniors etc.
15. Free public access to land is the cornerstone of a sustainable network of local, regional, and national trails where people can explore the land and engage with nature. Public access is important in New Zealand's health, wellbeing, recreation, active transport, and environment. We acknowledge that there will be many alternative public access areas to those that will effectively be behind the parking paywall, but paying to access the best is contrary to all that New Zealanders hold dear.
16. Should paid parking be introduced, there are two groups we would like to see exempt from paying. Firstly, we know that many volunteers – from conservation community groups, trail maker groups and local communities with which we work – gain and contribute much from utilising public access. It is important that charges, either for access or related amenities and services, do not undermine the conservation, economic and social benefits derived by nature and local communities from volunteers working on public

conservation land. It would be counterintuitive to charge these residents for access to land when they are performing a service. These groups may or may not be affected by the trial, but this must be kept in mind during the trial and any further rollout of paid parking. Secondly, there is a custom of DOC supporting education on public conservation land, for example through rangers leading groups of school children or by providing free places in huts. We believe this principle should be extended to parking so that any group of school children, guides, scouts, or students etc can park for free.

17. Should the trial go ahead as outlined, we suggest that there may be a risk of visitors rushing, for example, running around the Punakaiki Pancake Rocks and Blowholes Walk or running for a glimpse of Franz Josef glacier within the free 20 minutes of parking, to avoid obtaining a pass or paying for parking. This could create a risk for those people and others in their way, and we believe it should be monitored.
18. To maintain social licence in offering the proposed parking service, we recommend that DOC work with the supplier to ensure that penalties are not issued automatically. Instead, reminders are issued, and or a reasonable time frame is allowed for parking to be paid via an app or similar, with clear information available.

If you require more details or would like to discuss any of the above points further, my contact details are inger.perkins@herengaanuku.govt.nz and +64 27 370 1876.

A handwritten signature in blue ink, appearing to read 'Inger Perkins', with a long horizontal stroke extending to the right.

Inger Perkins

Regional Field Advisor, West Coast
Kaitohutohu ā-Rohe, Te Tai o Poutini