

Section	Sub Section	Sub nr	Sub point	Submitter Organisation	Submitter Name	Theme	Submission summary	Decision sought	Response
Places	Table 2.3: Access to Western Lakes and Mountains Place	1	1	Coronet Peak Ski Area	Nigel Kerr	Coronet Peak Recreation Reserve	Support the proposed changes to enable trails to be developed in this [parcel of pcl&w].	Retain proposed Table 2.3	Accept
Specific Policy Requirements	3.3. MTB-intro text	1	2	Coronet Peak Ski Area	Nigel Kerr		While there can be more sensitive environmental factors at higher altitudes [reference in first paragraph of introduction], consideration should be given to the degree of modification that already exists, and differentiate between those areas that already have substantial infrastructure and those that are more 'original' in environment.	Separate those areas that are already well developed in terms of infrastructure (where the sole environmental impact is the biking itself) from those where roads and tracks are impacted, toiletry issues exist, and overall the impact of MTB development has a greater footprint.	Accept in part This detail, including the level of development of an area, would form part of the assessment of effects when assessing a detailed proposal. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Specific Policy Requirements	Policy 3.3.1	1	3	Coronet Peak Ski Area	Nigel Kerr		Clarify what the intent of this policy is to allow. Is it [to enable cycling] anywhere within the named place, or by trail?	Differentiate between 'trail' and 'place'. Amend the tables in Part Two to clarify this.	Accept in part The purpose of Policy 3.3.1 is to allow independent biking on purposely formed tracks and roads on the pcl&w listed in the CMS Part Two - Places, such as Western Lakes and Mountains/Nga Puna Wai Karikari a Rakaihautu Place.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	2	1	Waitaki District Council	Erik van der Spek	Timber Creek Conservation Area	Support inclusion of this parcel of pcl&w in Table 2.2.	Retain this parcel of pcl&w in Table 2.2.	Accept
Places	Table 2.4: Access to Central Otago Uplands Place	2	2	Waitaki District Council	Erik van der Spek	Conservation Area - Oteake Access Strip	Support inclusion of this parcel of pcl&w in Table 2.4.	Retain this parcel of pcl&w in Table 2.4.	Accept
Places	Table 2.4: Access to Central Otago Uplands Place	2	3	Waitaki District Council	Erik van der Spek	Marginal Strip - Waitaki River (2805627)	Support inclusion of this parcel of pcl&w in Table 2.4.	Retain this parcel of pcl&w in Table 2.4.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	2	4	Waitaki District Council	Erik van der Spek	Marginal Strip - Deepdell Creek	Oppose limitation imposed on this parcel of pcl&w in Table 2.6 (limited to existing trail alignment only)	Confirm justification for the proposed limitation; and amend entry to remove this limitation.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	2	5	Waitaki District Council	Erik van der Spek	Golden Point Historic Reserve	Oppose limitation imposed on this parcel of pcl&w in Table 2.6 (limited to formed tracks only)	Confirm justification for the proposed limitation; and amend entry to remove this limitation.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.6: Access to Central Otago Drylands Place	2	6	Waitaki District Council	Erik van der Spek	Kyeburn Marginal Strip	Oppose limitation imposed on this parcel of pcl&w in Table 2.6 (limited to that part of the marginal strip which is located to the north of Kyeburn Diggings). Note that 4WD access is currently allowed south of the Kyeburn Diggings.	Confirm justification for the proposed limitation; and amend entry to remove this limitation.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	7	Waitaki District Council	Erik van der Spek	Conservation Area - Bushy Beach	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	8	Waitaki District Council	Erik van der Spek	Conservation Area - Kakanui Beach Road	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	9	Waitaki District Council	Erik van der Spek	Waiānakarua River Marginal Strip	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	10	Waitaki District Council	Erik van der Spek	Conservation Area - Waiānakarua River	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	11	Waitaki District Council	Erik van der Spek	Kurīnui Creek Marginal Strip (2808504)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	12	Waitaki District Council	Erik van der Spek	Hereford / Shewsbury Streets Public Purpose Reserve (Hamptden)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	14	Waitaki District Council	Erik van der Spek	Moeraki Beach Marginal Strip (2808529)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	15	Waitaki District Council	Erik van der Spek	Moeraki Boulders/Kaihinaiki Scenic Reserve (2808536)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept

Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	16	Waitaki District Council	Erik van der Spek	Moeraki Foreshore Marginal Strip (2808565)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3. Moeraki Foreshore Marginal Strip is included, excluding south of the Moeraki Township.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	17	Waitaki District Council	Erik van der Spek	Conservation Area - Moeraki	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	18	Waitaki District Council	Erik van der Spek	Conservation Area - Moeraki Public Access	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	19	Waitaki District Council	Erik van der Spek	Conservation Area - Moeraki Power Boat / Yacht Club	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	21	Waitaki District Council	Erik van der Spek	Shag Point/Matakeaa Marginal Strip (2808384)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	22	Waitaki District Council	Erik van der Spek	Onewhenua Conservation Area	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	23	Waitaki District Council	Erik van der Spek	Matakeaa Recreation Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	24	Waitaki District Council	Erik van der Spek	Waihero Scenic Reserve (2808232)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	25	Waitaki District Council	Erik van der Spek	Goodwood Scenic Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	26	Waitaki District Council	Erik van der Spek	Hawksbury Lagoon Wildlife Refuge Government Purpose Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	27	Waitaki District Council	Erik van der Spek	Marginal Strip - Waikouaiti River (2805983)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	28	Waitaki District Council	Erik van der Spek	Conservation Area - Brins Point	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	29	Waitaki District Council	Erik van der Spek	Marginal Strip - Careys Creek (2809131)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	30	Waitaki District Council	Erik van der Spek	Marginal Strip - Blueskin Bay (2805973)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	31	Waitaki District Council	Erik van der Spek	Orokouli Scenic Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	32	Waitaki District Council	Erik van der Spek	Conservation Area - Long Beach	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	33	Waitaki District Council	Erik van der Spek	Long Beach Recreation Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	34	Waitaki District Council	Erik van der Spek	Conservation Area - Orokouli	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	35	Waitaki District Council	Erik van der Spek	Heyward Point Scenic Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	36	Waitaki District Council	Erik van der Spek	Conservation Area - Heyward Point	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	37	Waitaki District Council	Erik van der Spek	Aramoana Recreation Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	38	Waitaki District Council	Erik van der Spek	Conservation Area - Aramoana Farm	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	39	Waitaki District Council	Erik van der Spek	Conservation Area - Mihiwaka	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	40	Waitaki District Council	Erik van der Spek	Grahams Bush Scenic Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept

Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	41	Waitaki District Council	Erik van der Spek	Conservation Area - Organ Pipes car park (Mt Cargill)	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	42	Waitaki District Council	Erik van der Spek	Mount Cargill Scenic Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	43	Waitaki District Council	Erik van der Spek	Conservation Area - Mt Cargill Scenic Reserve	Support inclusion of this parcel of pcl&w in Table 2.7.	Retain this parcel of pcl&w in Table 2.7.	Accept
Accompanying Info	2.7 Eastern Otago and Lowlands / Maukaatua Place	2	44	Waitaki District Council	Erik van der Spek	Bushy Beach Scenic Reserve	Oppose the exclusion of this parcel from the CMS. The clifftop of Bushy Beach Scenic Reserve is currently grazed by the adjacent landowner. Proposed cycle trail route does not include any natural ecosystems/nesting sites. Dog walking is not proposed as part of cycle trail development on this parcel. Waitaki Dog Control Bylaw 2014 prohibits dogs in the coastal areas between the Gamaru Commercial Blue Penguin Colony and Bushy Beach. Active use of the clifftop land will not be any different to what is currently provided for.	Provide for cycle trail access to cliff tops only at Bushy Beach Scenic Reserve.	Reject This reserve is the habitat of threatened or at-risk indigenous species. Biking would increase the presence of people (visitor numbers) in the hoiho/yellow-eyed penguin habitat. In addition, the existing infrastructure is inadequate for the increased visitor numbers, and further interventions at this confined site are unlikely to adequately manage increased visitor use.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	45	Waitaki District Council	Erik van der Spek	Conservation Area - Waikouaiti River Mouth	Oppose exclusion of this parcel.	Provide for cycle trail access to Conservation Area - Waikouaiti River Mouth.	Accept Conservation Area - Waikouaiti River Mouth was already identified for inclusion in Table 2.7.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	46	Waitaki District Council	Erik van der Spek	Marginal Strip - Waikouaiti River (2805983)	Oppose exclusion of this parcel.	Provide for cycle trail access at the Marginal Strip - Waikouaiti River	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	47	Waitaki District Council	Erik van der Spek	Moeraki Foreshore Marginal Strip (J42121)	Oppose exclusion of this parcel.	Provide for cycle trail access on this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3. Moeraki Foreshore Marginal Strip is included, excluding south of the Moeraki Township.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	48	Waitaki District Council	Erik van der Spek	Moeraki Foreshore Marginal Strip (J42123)	Oppose exclusion of this parcel.	Provide for cycle trail access on this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3. Moeraki Foreshore Marginal Strip is included, excluding south of the Moeraki Township.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	49	Waitaki District Council	Erik van der Spek	Moeraki Boulders/Kaihinaki Scenic Reserve (2808536)	Oppose exclusion of this parcel.	Provide for cycle trail access at the Moeraki Boulders/Kaihinaki Recreation Reserve carpark.	Accept Moeraki Boulders/Kaihinaki Scenic Reserve is already detailed for inclusion in Table 2.7.
Accompanying Info	2.7 Eastern Otago and Lowlands / Maukaatua Place	2	50	Waitaki District Council	Erik van der Spek	Waianakarua to Kakaho Creek Coastline Marginal Strip	Oppose exclusion of this parcel.	Provide for cycle trail access at the Waianakarua to Kakaho Creek Coastline Marginal Strip.	Reject Waianakarua to Kakaho Coastline Marginal Strip has not been included to protect hoiho habitat.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	2	51	Waitaki District Council	Erik van der Spek	Waianakarua River Marginal Strip	Oppose exclusion of this parcel (J42029 component)	Provide for cycle trail access on this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Accompanying Info	2.7 Eastern Otago and Lowlands / Maukaatua Place	2	52	Waitaki District Council	Erik van der Spek	Te Hakapureirei Beach Marginal Strip	Oppose exclusion of this parcel (J42025 and J42026). Note the proposed cycle trail would be largely on the road verge, but may encroach onto the marginal strip in some places only. The proposed cycle trail formation may only require 0.5 - 1 metre in conjunction with road reserve. There is no evidence that a cycle track is not practical as the design has not been confirmed.	Provide for cycle trail access on this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Specific Policy Requirements	Policy 3.3.4	2	53	Waitaki District Council	Erik van der Spek		Support the process for considering new further opportunities not identified in Policy 3.3.1 for cycling on public conservation lands and waters. This process provides for the consideration of new proposals not identified in the CMS which was not previously possible.	Retain policy 3.3.4	Accept in part A partial review is still required for pcl&w not identified in this partial review. See standard response.
General	general comments	3	1		Philip Wyndham		Support all the tracks and trails as listed on the 2020 Partial Review to be allowed mountain bike and e-bike access. Cycle trails contribute and align perfectly with the Government's four pillars of contributing positively - socially, culturally, economically, and environmentally.	No specific relief sought.	Accept After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	4	1	Dunedin City Council	John Brenkley	Strategy and policy alignment - other agencies	The proposed CMS amendments do not result in any conflicts with the Parks and Recreation Strategy 2017 - 2027. The CMS supports one action - to develop a cycleway and walking plan to provide easier access to major recreation and sporting hubs and outdoor recreation areas.	No specific relief sought.	Noted
General	general comments	4	2	Dunedin City Council	John Brenkley	Strategy and policy alignment - other agencies	There are around 10 Parks and Recreation tracks that link into the locations in Dunedin provided for in the CMS; and a network of tramping tracks within the 3 Waters Silverstream Catchment. Discussions with DCC 3 Waters team confirmed that they have no concerns with multi-use recreational activities continuing within the Silverstream area	No specific relief sought.	Noted
General	general comments	4	3	Dunedin City Council	John Brenkley	Strategy and policy alignment - other agencies	The draft Otago CMS supports the Integrated Transport Strategy 2013 as it contributes to improving travel choices by enabling bikes and e-bikes to be used in more locations.	No specific relief sought.	Noted

Places	Table 2.7: Access to Eastern Otago and Lowlands Place	4	4	Dunedin City Council	John Brenkley	Strategy and policy alignment - other agencies	Dunedin City Council supports the locations listed in Table 2.7 for inclusion in the draft Otago CMS as it enables the potential future cycle trail connecting Dunedin with Oamaru, and the Alps to Ocean Trail.	No specific relief sought.	Accept After careful consideration, most proposed areas of pctl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	5	1		Belinda and David Hay		We support the partial review to allow for new cycle tracks and trails. Further expansion is important to allow for people now and in the future to cycle and walk in these areas of outstanding natural beauty.	No specific relief sought.	Accept After careful consideration, most proposed areas of pctl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiau/Ō Place	6	1	Mapworks - Great Rides App	Gary Patterson	Conservation Area - Greenstone Conservation Area - Mavora Lakes (Manawapōpōre/Hikuraki)	Oppose the preclusion of cycling on the Greenstone-Mavora Walkway. Mountain bikes do not add to noise, and do not reduce the tranquil nature of the area. Damage to date is caused by 4WD vehicles cutting up the existing track to the north of the lake and creating rough tracks. Cattle in the Greenstone area has a greater impact than that of cycling.	Enable the Greenstone to Te Anau trail put forward by the Southern Eco Trails Trust	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	6	2	Mapworks - Great Rides App	Gary Patterson	Maungatika Trail	Support the Maungatika Trail in the Hāwea Conservation Park because the track will be consistent with the nature of the conservation park.	Enable the Maungatika Trail proposal.	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	7	1	NZ Deerstalkers Association - Upper Clutha Branch	Murray Burns	Maungatika Trail	Support the Maungatika Trail in principle on the condition that the activity does not result in limitations on the predominant and traditional activity of hunting in the Hāwea Conservation Park/Area. Impacts on the terrain and environment will be nominal and balanced by the positive advantages that will accrue from the activity to the outdoor recreational community.	Enable the Maungatika Trail proposal, provided no limitations on hunting activities.	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	7	2	NZ Deerstalkers Association - Upper Clutha Branch	Murray Burns	Matatiaho Conservation Area	Recreational hunters can only access the Matatiaho Conservation Area after obtaining a Special Permit. This controlled access is necessary because of the tight, steep terrain, and the need to limit numbers for safety reasons. Enabling cycling to occur on this parcel will create administrative difficulties for DOC, and will seriously compromise hunting opportunities and safety values. Any new tracking should be established on existing farm tracks on the neighbouring freehold land.	Do not enable cycling within this parcel of land.	Reject The Matatiaho Conservation Area was already listed in the CMS allowing for mountain biking prior to the partial review, it has been retained.
Accompanying Info	2.8 Catlins/Te Ākau Tai Toka Place	8	1	Catlins Promotions	Fergus Sutherland	Tautuku Bay Scenic Reserve	Oppose the exclusion of this parcel from the CMS for the following reasons (against the listed reasons for excluding the list of parcels in the Catlins): - The proposed trail is more than 500m from the coast and is within 100m of the highway. The route is practical as it is level or undulating. - There is no major riparian vegetation in the proposed track location. - No threatened plants and animals are confined to the proposed route. About 10% of the route is through mature podocarp forest and the rest is through cut-over native forest. - The strip of forest proposed for the route parallels the highway and could be said to widen the road, however the trail will not involve any significant tree removal and would retain full forest canopy available for wildlife movement. - Minor impacts on forest and shrub ecosystems similar to the Lake Wilkie and Nature walk to the beach. - No significant wetlands along the proposed route. - While the cited wildlife values exist on the coast, the proposed track will be at least 500m from such habitats. - The proposed route is flat to undulating with no hazardous sections.	Enable the 'Tautuku Trails' proposal on the Tautuku Bay Scenic Reserve.	Reject This Scenic Reserve has not been included in the CMS to protect the ecosystems and threatened species habitats.
Places	Policy 2.2.6	21	1	Otago Tramping and Mountaineering Club	Joe Bretherton		Support enabling cycling access in places where motorised vehicles are already provided for.	Retain Policy 2.2.6	Accept in part Policy 2.2.6 allows for motorised vehicle, non-motorised bikes on pctl&w identified in Table 2.2. Table 2.2 also details where motorised vehicles can go but is not part of this partial review.
Places	Policy 2.3.2	21	2	Otago Tramping and Mountaineering Club	Joe Bretherton		Support enabling cycling access in places where motorised vehicles are already provided for.	Retain Policy 2.3.2	Accept in part Policy 2.3.2 allows for motorised vehicle, non-motorised bikes on pctl&w identified in Table 2.3. Table 2.3 also details where motorised vehicles can go but is not part of this partial review.
Places	Policy 2.4.5	21	3	Otago Tramping and Mountaineering Club	Joe Bretherton		Support enabling cycling access in places where motorised vehicles are already provided for.	Retain Policy 2.4.5	Accept in part Policy 2.4.5 allows for motorised vehicle, non-motorised bikes on pctl&w identified in Table 2.4. Table 2.4 also details where motorised vehicles can go but is not part of this partial review.
Places	Policy 2.5.6	21	4	Otago Tramping and Mountaineering Club	Joe Bretherton		Support enabling cycling access in places where motorised vehicles are already provided for.	Retain Policy 2.5.6	Accept in part Policy 2.5.6 allows for motorised vehicle, non-motorised bikes on pctl&w identified in Table 2.5. Table 2.5 also details where motorised vehicles can go but is not part of this partial review.
Places	Policy 2.6.10	21	5	Otago Tramping and Mountaineering Club	Joe Bretherton		Support enabling cycling access in places where motorised vehicles are already provided for.	Retain Policy 2.6.10	Accept in part Policy 2.6.10 allows for motorised vehicle, non-motorised bikes on pctl&w identified in Table 2.6. Table 2.6 also details where motorised vehicles can go but is not part of this partial review.
Places	Policy 2.7.13	21	6	Otago Tramping and Mountaineering Club	Joe Bretherton		Support enabling cycling access in places where motorised vehicles are already provided for.	Retain Policy 2.7.13	Accept in part Policy 2.7.13 allows for motorised vehicle, non-motorised bikes on pctl&w identified in Table 2.7. Table 2.7 also details where motorised vehicles can go but is not part of this partial review.

Places	Policy 2.8.7	21	7	Otago Tramping and Mountaineering Club	Joe Bretherton		Support enabling cycling access in places where motorised vehicles are already provided for.	Retain Policy 2.8.7	Accept in part Policy 2.8.7 allows for motorised vehicle, non-motorised bikes on pcf&w identified in Table 2.8. Table 2.8 also details where motorised vehicles can go but is not part of this partial review.
Specific Policy Requirements	Policy 3.3.1	21	8	Otago Tramping and Mountaineering Club	Joe Bretherton		Support independent and guided mountain biking where mountain biking access is allowed, and have no concern with this being promoted on DOC's website.	Retain policy 3.3.1	Accept
Specific Policy Requirements	Policy 3.3.2	21	9	Otago Tramping and Mountaineering Club	Joe Bretherton		Support independent and guided mountain biking where mountain biking access is allowed, and have no concern with this being promoted on DOC's website.	Retain policy 3.3.2	Accept
Specific Policy Requirements	Policy 3.3.3	21	10	Otago Tramping and Mountaineering Club	Joe Bretherton		Support independent and guided mountain biking where mountain biking access is allowed, and have no concern with this being promoted on DOC's website.	Retain policy 3.3.3	Accept
Specific Policy Requirements	Policy 3.3.6	21	11	Otago Tramping and Mountaineering Club	Joe Bretherton		We do not support the creation of new tracks on conservation land, particularly by mountain bike clubs and private parties. Any new tracks of this nature are likely to be single track, have a high likelihood of causing significant land disturbance, and can cause conflicts with other users. New tracks should follow the statutory amendment process.	Delete Policy 3.3.6	Reject in part Policy 3.3.6 provides direction for the decision maker for the construction and maintenance of bike tracks, including those managed by the Department. The 3.3 policies have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including Conservation assessments and if there is a need for further public consultation. See standard response.
Specific Policy Requirements	Policy 3.3.8	21	12	Otago Tramping and Mountaineering Club	Joe Bretherton		We do not support the creation of new tracks on conservation land, particularly by mountain bike clubs and private parties. Any new tracks of this nature are likely to be single track, have a high likelihood of causing significant land disturbance, and can cause conflicts with other users. New tracks should follow the statutory amendment process.	Delete Policy 3.3.8	Reject Policy 3.3.8 ensures the effects of mountain bike and e-bike use are monitored.
Specific Policy Requirements	Policy 3.3.10	21	13	Otago Tramping and Mountaineering Club	Joe Bretherton		We do not support the creation of new tracks on conservation land, particularly by mountain bike clubs and private parties. Any new tracks of this nature are likely to be single track, have a high likelihood of causing significant land disturbance, and can cause conflicts with other users. New tracks should follow the statutory amendment process. Particularly object to Policy 3.3.10 there is no place for downhill, freestyle and dirt jumping on public conservation lands.	Delete Policy 3.3.10	Reject Policy 3.3.10 has not changed in this partial review apart from where e-bikes and mountain bikes are being included in the same Policy. In order to undertake these activities, they must be consistent with the Outcome and Policies sought for a Place and the adverse effects can be avoided, remedied or mitigated.
Specific Policy Requirements	Policy 3.3.11	21	14	Otago Tramping and Mountaineering Club			We do not support the creation of new tracks on conservation land, particularly by mountain bike clubs and private parties. Any new tracks of this nature are likely to be single track, have a high likelihood of causing significant land disturbance, and can cause conflicts with other users. New tracks should follow the statutory amendment process.	Delete Policy 3.3.11	Reject Policy 3.3.11 has only had minor changes to include cycle clubs and to identify opportunities for involvement in conservation and recreation programmes.
General	general comments	40	1	Real Journeys	Fiona Black		Real Journeys applauds the Department's initiative to partially review the Otago Conservation Management Strategy to facilitate motorised vehicle, mountain bike and electric power-assisted pedal cycle access on or through the Otago Conservation Estate to provide for greater recreation opportunities in the region.	No relief specified - see other submission points	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	40	2	Real Journeys	Fiona Black	Conservation Area - Big Beach/Shotover River	Real Journeys supports motorised vehicle access on or through Conservation Area - Big Beach Shotover River to enable the development of cycleways along the margins of the Shotover River.	Support policy 2.3.2 with respect to the Conservation Area - Big Beach/Shotover River.	Accept This partial review is only addressing non-motorised bike access.
Places	Table 2.3: Access to Western Lakes and Mountains Place	40	3	Real Journeys	Fiona Black	Marginal Strip - Kawarau River (2804655, 2804664)	Real Journeys supports motorised vehicle access on or through Marginal Strip - Kawarau River (2804655, 2804664) to enable the development of cycleways along the margins of the Kawarau River.	Support policy 2.3.2 with respect to the Marginal Strip - Kawarau River (2804655, 2804664)	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	40	4	Real Journeys	Fiona Black	Motatapu Conservation Area	Real Journeys supports motorised vehicle access on or through Motatapu Conservation Area to enable more year-round activities on part of the Treble Cone ski area.	Support policy 2.3.2 with respect to the Motatapu Conservation Area	Accept in part This partial review is only addressing non-motorised bike access.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Kārikiri a Rākahautū Place	40	5	Real Journeys	Fiona Black	North Motatapu Conservation Area	Real Journeys supports in principle improved access to pcf&w. However, Real Journeys will be guided by the views of the Wanaka community and backcountry users of the site as to whether a cycling trail should be enabled in the North Motatapu Conservation Area.	No specific relief sought.	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
Specific Policy Requirements	3.3. MTB-intro text	54	1	Jane Forsyth			The Partial Review reads like an assault on the natural and conservation values of a great deal of conservation land. It does not contain any sections explicitly giving priority to conservation values over recreational proposals (as is required by the Conservation Act s5(e)). There are many opportunities to upgrade and reform existing 4 WD and tramping tracks to facilitate additional recreation without creating new tracks in areas where none presently exist.	Amend the introductory text in 3.3. as follows: " Multiple opportunities exist for mountain biking... and to some degree, cycling access in country with low vegetation and topography - allens and where vulnerable conservation values are not threatened. "	Accept in part Text changed to read: " Multiple opportunities exist for biking... where vulnerable conservation values are not threatened. "
General	general comments	54	3	Jane Forsyth			The document is tremendously complex and makes meaningful and comprehensive submissions difficult.	Undertake a comprehensive review of the document to remove inconsistencies and make it more user friendly.	Accept in part The changes made as a result of submissions will improve the final document before it is incorporated into the CMS.
General	general comments	54	4	Jane Forsyth			There is reference [in the Accompanying Information] to cycling in the North Motatapu Conservation Area having a significant change/impact on the existing back country recreational activities, and that cycling is not considered to be compatible with this experience. Why single out this one area? Most of the back country in the Otago Region qualifies equally for this type of protection.	Undertake a comprehensive review of the document to remove inconsistencies and make it more user friendly.	Reject After careful consideration, most proposed areas of pcf&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.5	54	5	Jane Forsyth		Criterion (a)(ii)	This criterion refers to threatened species and habitats in coastal areas, but not for inland areas. This is an unbalanced and inconsistent approach to the treatment of threatened species.	Undertake a comprehensive review of the document to remove inconsistencies and make it more user friendly.	Accept Text has been changed to read 'species and habitats, particularly threatened species and habitats'. Removing reference to those only in the coastal area.

Places	Policy 2.2.6	54	6	Jane Forsyth		Policy 2.2.6 states "Should allow motorised vehicle, mountain bike and ..." This gives the impression that vehicles <u>should</u> and <u>will</u> be allowed at the sites listed. The policy needs to be more discretionary as all the specific requirements in Section Three still need to be met.	Amend Policy 2.2.6 to read " <u>May</u> allow..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d). Should policies have a strong expectation of outcome and is appropriate for Policy 2.2.6. This ensures not only can the use of motorised vehicles and non-motorised bikes only occur on pCl&w identified in Table 2.2 it also is required to take into consideration the Policies detailed in Part Three. A 'may' policy would allow for discretion, particularly in applying the 3.3 policies. The Policy will remain 'Should allow'.
General	general comments	54	7	Jane Forsyth	Proposed tracks	There is numerous reference in the tables in Part Two to 'proposed tracks'. The wording at the top of each table says 'should allow' and the map layer shows 'supported'. It is premature to 'support' these [tracks] when they have not been through the full assessment process set out in the policies in Section 3. Development advocates are likely to assume DOC approval from the existing wording and DOC approval cannot be reasonably given without full assessment and public consultation.	'Proposed tracks' could be listed and shown in the document, but no indication of support for them should be given until they have been properly assessed and publicly notified.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	54	8	Jane Forsyth	Maungatika Trail	I oppose the development of most of the Maungatika Trail. Much of it would involve constructing new track and huts where none currently exists, resulting in adverse effects on landscape, naturalness, and possibly flora/fauna values. The country is steep and erosion prone, with low rainfall, potential exists for extensive scarring. Te Araroa walkers may enjoy some advantage from a small part of this track which could be formed as a shared track.	Require extensive expert input, public consultation and economic feasibility study (at the applicant's cost) before proceeding further with this.	Accept in part After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	54	9	Jane Forsyth	Kidds Bush Loop Trail	I do not support this track on the basis of current knowledge. Hand-constructed tracks have been made here in the past without proper authorisation. Considerable damage to vegetation and soil would probably result from track construction in such steep country. Potential for conflict with walkers on the Sawyer Burn track.	Require extensive expert input, public consultation and economic feasibility study (at the applicant's cost) before proceeding further with this.	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.3: Access to Western Lakes and Mountains Place	54	10	Jane Forsyth	Hector Mountain Conservation Area	The wording (in the Table) suggests that the whole of this area is supported for [cycle] track development. This is not good enough, detailed proposals must be submitted, assessed and notified to the public. Hector Mountain is not on the same scale as other smaller conservation areas and marginal strips that are dealt with in this table.	Remove Hector Mountain Conservation Area from Table 2.3.	Reject in part. The section of Hector Mountain Conservation Area managed by the Otago CMS has been retained. This allows for a bike track proposal to be considered. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.4: Access to Central Otago Uplands Place	54	11	Jane Forsyth	Conservation Area - Lepidium Kawarau Habitat	Surely it is incompatible with the conservation of a very rare plant to be allowing cycling in this reserve, with or without newly constructed cycle tracks.	Remove Conservation Area - Lepidium Kawarau Habitat from Table 2.4, or amend the entry to include a limitation such that no development is allowed across the Lepidium Kawarau Habitat due to its high values and threatened species.	Reject in part. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including species, particularly threatened species and their habitats.
Places	Table 2.4: Access to Central Otago Uplands Place	54	12	Jane Forsyth	Lindis Conservation Area	Support redevelopment and re-grading of existing 4WD tracks in this area to enable cycling. Cycle tracks probably cannot affect existing landscape values and few or no trees would be damaged.	No specific relief sought.	Accept
Places	Table 2.4: Access to Central Otago Uplands Place	54	13	Jane Forsyth	Pisa Conservation Area	The proposed Mt Hocken Track would have a huge and very visible landscape effect. There are existing roads/tracks for biking along the range and this new zigzag track would have adverse impacts when viewed from the Crown Range Road heading south.	Decline permission for this new track on landscape grounds.	Reject The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including landscape assessments.
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	54	14	Jane Forsyth	Mahaka Katia Scientific Reserve	I oppose any cycle track development across this reserve. CMS states (1.3) that Central Otago has relatively few formally protected low-altitude dryland habitats which provide a haven or dryland conservation including nationally threatened species ... and distinctive plant communities. Mahaka Katia is one of the most significant of these few reserves. I support the Wanaka Link Trail, but it must not be allowed to go either inland or on the river side of the reserve.	State explicitly that no development is to be allowed across Mahaka Katia Scientific Reserve.	Accept Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Places	Table 2.6: Access to Central Otago Drylands Place	54	15	Jane Forsyth	Flat Top Hill	Note that Flat Top Hill is in the table twice - once as a conservation area and once as a Scenic Reserve.	No specific relief sought.	Accept Flat Top Hill Conservation Area and Scenic Reserve Flat Top Hill are two separate parcels of pCl&w. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Specific Policy Requirements	Policy 3.3.1	54	16	Jane Forsyth		As written, the policy gives the impression that independent biking <u>will</u> be allowed on the identified areas.	Amend policy to " <u>Should May</u> allow independent mountain biking..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d) and are used in decision making policies particular around authorisations, such as guided biking. Should policies have a strong expectation of outcome. A 'may' policy has more discretion, particularly in ensuring consistency with the Part Two Tables. The Policy will remain 'Should allow'.
Specific Policy Requirements	Policy 3.3.4	54	17	Jane Forsyth		The wording of this policy should be stronger as the considerations listed below are actually mandatory.	Amend policy 3.3.4 as follows: " <u>Should Must</u> , when considering new opportunities... a) <u>must</u> follow the statutory... b) <u>must</u> undertake consultation... c) <u>must</u> apply the following criteria..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. Must is not provide for in the Conservation General Policy.

Specific Policy Requirements	Policy 3.3.5	54	18	Jane Forsyth		The wording of this policy should be stronger as the considerations listed below are actually mandatory and these are the only protections that the conservation land have against adverse development.	Amend Policy 3.3.5 as follows: "Should Must assess the following when considering whether..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. Must is not provide for in the Conservation General Policy. A 'may' policy would allow for discretion, particularly in applying the 3.3 policies. The Policy will remain 'Should allow'.
Specific Policy Requirements	Policy 3.3.5	54	19	Jane Forsyth	Criterion (a)(ii)	This policy lists threatened species and habitats in coastal areas. Inland areas also have threatened species and habitats, so this section is unbalanced.	Amend policy 3.3.5(a)(ii) as follows: "species, particularly threatened species such as haiho/yellow-eyed penguin and rāpōka/whakahoā/New Zealand sea lion, and habitats -including coastal areas, "	Accept in part This Policy has been reworded to read, 'species and habitats, in particular threatened species and habitats.' Removing reference to those only in the coastal area.
Specific Policy Requirements	Policy 3.3.5	54	20	Jane Forsyth	Criterion (c)	This criterion needs to be strengthened. It should not be discretionary whether specialist reports are required. Specialist reports are always required (at the cost of the applicant) for any new tracks or facilities. Good decision making requires having this information.	Amend Policy 3.3.5 (c) by deleting 'if from the criterion.	Reject in part Specialist reports may not always be required, particularly if this is a small joining track or a minor extension to a track. Proposals are required to go through an assessment which includes consultation with the Rūnaka and Ngāi Tahu and Otago Conservation Board. Through this assessment it will be determined if specialist reports will be required.
Specific Policy Requirements	Policy 3.3.5	54	21	Jane Forsyth	Criterion (d)	Public notification should be mandatory and not a matter for assessment of whether it is necessary. Conservation lands are public lands. The public always needs to be consulted in the case of changes that affect them. Public conservation lands are managed by DOC on behalf of the public.	Amend Policy 3.3.5(d) by deleting 'if from the criterion.	Reject in part Public notification may not always be required, particularly if this is a small joining track or a minor extension to a track. Proposals are required to go through an assessment which includes consultation with the Rūnaka and Ngāi Tahu and Otago Conservation Board. Through this assessment it will be determined if public notification is required.
Specific Policy Requirements	Policy 3.3.5	54	22	Jane Forsyth	Criterion (g)	Consultation with interest groups, local authorities and landowners should be mandatory and not a matter for assessment of whether it is necessary. Consulting widely should prevent a whole lot of contention later and may improve the original proposal.	Amend Policy 3.3.5(g) by deleting 'if from the criterion.	Reject in part Consultation with interest groups, concessionaires, local authorities, and adjacent landowners etc may not always be required, particularly if there is no significant adjoining landowner or the proposal is minor. Proposals are required to go through an assessment which includes determining if further consultation is required.
Specific Policy Requirements	Policy 3.3.6	54	23	Jane Forsyth		This policy amounts to an instruction to DOC to construct new cycle tracks. The policy does not even say 'should', unlike most of the previous policies in this section. This policy is clearly intended to allow DOC to carry out or authorise the works decided upon. The construction of a new track is always discretionary and the wording needs to give this sense.	Amend Policy 3.3.6 as follows: "May construct and maintain, and may grant authorisations to construct and maintain..."	Reject May is not required at the start of the Policy as DOC does is not required to authorise themselves however the CMS needs to reflect there are times when the construction and maintenance of trails built by DOC is required and subject to the same scrutiny as those built by others. Policy 3.3.6 (now 3.3.7) is subject to all the criteria in Policy 3.3.5 (now 3.3.6).
Specific Policy Requirements	Policy 3.3.7	54	24	Jane Forsyth		This is a clear case where DOC <u>should</u> carry out the policy (implementing mitigation controls) and the wording should reflect this.	Amend Policy 3.3.7 as follows: "Should implement any controls necessary... "	Reject This policy provides direction for DOC in managing the activity and what might be included in an authorisation. It is not providing decision making direction for an authorisation therefore the changes suggested is not necessary.
Specific Policy Requirements	Policy 3.3.8	54	25	Jane Forsyth		This policy needs to have 'should' at the commencement of the policy.	Amend Policy 3.3.8 as follows: "Should monitor the effects of mountain bike..."	Reject This policy provides direction for DOC in monitoring the activity. It is not providing decision making direction for an authorisation therefore the changes suggested is not necessary.
Specific Policy Requirements	Policy 3.3.9	54	26	Jane Forsyth		This policy needs to have 'should' at the commencement of the policy.	Amend Policy 3.3.9 as follows: "Should review mountain bike and e-bike use on tracks..."	Reject This policy provides direction for DOC in reviewing the findings of the monitoring of effects. It is not providing decision making direction for an authorisation therefore the changes suggested is not necessary.
Specific Policy Requirements	Policy 3.3.10	54	27	Jane Forsyth		The use of 'should' at the start of this policy is the wrong word to use, and implies a degree of certainty that is inappropriate for these activities.	Amend Policy 3.3.10 as follows: "Should May provide for mountain biking and e-biking activities such as downhill, freestyle and dirt jumping..."	Accept in part The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d). Should policies have a strong expectation of outcome. Policy 3.3.10 has now been moved and has been added to Policy 3.3.6 as one of the assessments when determining the appropriateness of a bike track.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautō Place	54	28	Jane Forsyth		Why is the statement provided in respect of the North Motatapu Conservation Area only provided for that parcel of conservation land? Most of the backcountry in the Otago Region qualifies as places where people expect to enjoy a quiet, remote and tranquil location. The rationale of cycling having a significant change/impact on existing back country recreational activities would apply to every bit of conservation land that doesn't have a track currently.	No relief specified.	Reject After careful consideration, most proposed areas of pc&w have been added to the CMS, so a lake tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.

General	general comments	70	1 Sport Otago	John Brimble		<p>Sport Otago supports the proposal that all tracks shown on the DOC interactive mapping should be open for consideration, community consultation and where applicable, development.</p> <p>Biking is a very popular activity for people of all ages to be physically active. The ongoing development of tracks will benefit the people of Otago and the economic activity resulting from people visiting the region.</p> <p>Sport Otago is concerned that the partial review restricts the ability to discuss the development of future biking developments for the following reasons:</p> <ul style="list-style-type: none"> - contrary to the Sport New Zealand National Strategy for active recreation; - it would limit the ability to extend biking infrastructure and thus miss opportunities to contribute to the tourism sector; - it appears to run counter to the Conservation General Policy clause 2(e) requiring that tangata whenua are consulted on specific proposals that involve places or resources of spiritual or historical and cultural significance to them - removing the ability to even discuss proposals would hinder this requirement; - inhibiting the development of biking infrastructure 	DOC needs to change its proposed position on public consultation. Conservation land should be available to the people of New Zealand to enjoy in the most appropriate way, and the proposed change removes even the right to propose and debate the development of biking facilities.	Accept in part. See standard response. The partial review has allowed for a large number of proposals to be put forward and included in the CMS to allow for the discussion of their development at a later date and allowing for the infrastructure to be extended. As well as the Department's obligations under section 4 of the Conservation Act 1987, the partial review has been undertaken in consultation with Ngāi Tahu and as a result has developed the 3.3 Policies which allows for the proposals to be fully assessed included 3.3.5 (e) which provides for engagement with Runaka and Te Runanga o Ngāi Tahu to inform the assessments of the proposals. The 3.3 policies also provide for further public consultation if required as a result of the assessments.
General	general comments	70	2 Sport Otago	John Brimble		Sport Otago supports adding tracks to the Tables in Part Two of the CMS, such that they can at some future date be considered.	No specific relief sought	Accept After careful consideration, most proposed areas of pōkū have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.1	98	1 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey	Providing for guided use of tracks	A significant driver of central and local government investment in Ngā Haerenga New Zealand Cycle Trails network to date has been focussed on realising economic benefit to adjacent communities. Businesses must be able to reasonably operate on Ngā Haerenga New Zealand Cycle Trails for economic value to be realised locally.	Amend policy to support guided and biking support services to better reflect the advantages to visitors, conservation protection, visitor safety and satisfaction.	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.4	98	2 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey		<p>Policy 3.3.4 states that any biking track not provided for in the CMS will need to be considered via a plan change process. This is too inflexible given the growth in the popularity of cycling.</p> <p>Ngā Haerenga New Zealand Cycle Trails understands this issue has been raised with the Minister and DOC senior leaders, and is working with DOC on a potential change that will enable better provision for biking on conservation land. It's imperative that change is agreed.</p> <p>The current approach could result in existing trails being overwhelmed to cater for the increased demand.</p>	Consider a change to this policy that would enable trial use by bikers on existing walking tracks where specific criteria are met (low use by walkers, track meets certain design criteria, demand by bikers to use the track).	See standard response.
Specific Policy Requirements	Policy 3.3.6	98	3 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey	Trail standards	Ngā Haerenga New Zealand Cycle Trails is keen to work with DOC to ensure that the trail grades set on public conservation land are consistent with those being set off conservation land. Note the requirement in this policy to meet 'DOC standards'. This is not a concern as currently these align with Ngā Haerenga New Zealand Cycle Trail standards.	NZCT will ensure that DOC is a partner when looking at any changes to the NZCT standards, and requests that DOC undertake the same commitment so that the standards work well together.	Noted. The Department continues to be committed to working closely with NZCT and ensure our standards are aligned as much as possible.
Specific Policy Requirements	Policy 3.3.7	98	4 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey		Ngā Haerenga New Zealand Cycle Trails requests that this policy is amended to ensure that any decisions around trail use restrictions that affect Ngā Haerenga New Zealand Cycle Trails is done in consultation with NZCT to avoid well meaning decisions affecting how whole sections of Great Rides are used.	Amend Policy 3.3.7 to give effect to submission point (no specific relief sought).	Reject This policy provides direction for DOC in managing the activity and what might be included in an authorisation. NZCT would be involved in discussions regarding their authorisations, therefore the changes suggested is not necessary.
General	general comments	98	5 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey		Ngā Haerenga New Zealand Cycle Trails' key objective for this process is to ensure that all parts of the following trails that have now been in place for at least 5 years are authorised:	No specific relief sought beyond ensuring that these trails are provided for in the CMS.	Accept in part After careful consideration, most proposed areas of pōkū have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	98	6 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey		<p>Ngā Haerenga New Zealand Cycle Trails seeks that the following new trails are provided for - they are well advanced in planning, funding and with DOC as a partner:</p> <ul style="list-style-type: none"> - Kawarau Gorge Trail; - Dunstan Trail; - Roxburgh Gorge Gap; - Wanaka Link Trail; - Cycle Link Track; and - Sections of marginal strip for the proposed extension of the Queenstown Trail between Tuckers Beach and Arthurs Point; and Kawarau to Gibbston. 	No specific relief sought beyond ensuring that these trails are provided for in the CMS.	Accept in part After careful consideration, most proposed areas of pōkū have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	98	7 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey		Ngā Haerenga New Zealand Cycle Trails supports the extensions of cycling opportunities generally with Otago as these will enable growing interest in biking to be facilitated and ensure that existing trails are better connected and don't get over utilised.	No specific relief sought.	Accept in part After careful consideration, most proposed areas of pōkū have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	98	8 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey		Linking Great Rides together between Jacks Point and Kingston and Walter Peak to Te Anau/Glenorchy will be of benefit.	No specific relief sought beyond ensuring that these trails are provided for in the CMS.	Accept in part After careful consideration, most proposed areas of pōkū have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	98	9 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey		Where new trails link to existing trails that are part of Ngā Haerenga New Zealand Cycle Trails network, DOC should consider ensuring that the grades of new tracks are aligned so that bikers can safely enjoy these connected networks.	No specific relief sought.	Accept This is a consideration applies to all trails not just those adjoining NZCT network.
General	general comments	98	10 Ngā Haerenga New Zealand Cycle Trails	Janet Purdey	E-bikes	Ngā Haerenga New Zealand Cycle Trails supports the proposed changes to ensure that e-bikes are given the same level of access as other bikes on public conservation land.	No specific relief sought.	Accept

General	general comments	104	1	Queenstown Trails Trust	Mark Williams	Mapping	QTT supports all tracks indicated on the interactive mapping across Otago. The Trust advocates for the development of an integrated trail network throughout the Otago Region. The partial review is an opportunity for DOC to play a strong role in developing better conservation outcomes for p&w through cycle trails, slowing down tourist travel, and facilitating engagement with the landscape and mana whenua. Trails can support ecological restoration by enhancing access to areas.	No specific relief sought.	Accept After careful consideration, most of the areas of p&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	2	Queenstown Trails Trust	Mark Williams	Conservation Area - Big Beach/Shotover River	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	3	Queenstown Trails Trust	Mark Williams	Marginal Strip - Shotover River	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	4	Queenstown Trails Trust	Mark Williams	Conservation Area - Lower Shotover	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	5	Queenstown Trails Trust	Mark Williams	Tuckers Beach Recreation Reserve	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept After careful consideration, most proposed areas of p&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	6	Queenstown Trails Trust	Mark Williams	Marginal Strip - Kawarau River	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	7	Queenstown Trails Trust	Mark Williams	Marginal Strip - Rastus Burn	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	8	Queenstown Trails Trust	Mark Williams	Marginal Strip - Owen Creek	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	9	Queenstown Trails Trust	Mark Williams	Chard Road Recreation Reserve	QTT supports the inclusion of this parcel in Table 2.3	No specific relief sought.	Accept
Places	Table 2.4: Access to Central Otago Uplands Place	104	10	Queenstown Trails Trust	Mark Williams	Conservation Area - Lepidium Kawarau Habitat	QTT seeks the inclusion of this parcel.	Include Conservation Area - Lepidium Kawarau Habitat in the CMS	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	11	Queenstown Trails Trust	Mark Williams	Kawarau River Marginal Strip and adjacent conservation areas	QTT seeks the reinstatement of this parcel.	Include Kawarau River Marginal Strip and adjacent conservation areas in the CMS.	Accept in part This entry was not deleted, but rather moved to its correct name. However, Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.4: Access to Central Otago Uplands Place	104	12	Queenstown Trails Trust	Mark Williams	Conservation Area - Access to Kawarau River (Gibbston)	QTT seeks the reinstatement of this parcel.	Include Conservation Area - Access to Kawarau River (Gibbston) in the CMS	Accept in part This parcel is included in Table 2.4 in the CMS as notified, with the limitation excluding Peregrine Loop Walking Track.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	13	Queenstown Trails Trust	Mark Williams	Conservation Area - Gibbston	QTT seeks the reinstatement of this parcel.	Include Conservation Area - Gibbston in the CMS	Accept This parcel is included in Table 2.4 in the CMS as notified, with no limitations.
General	general comments	104	14	Queenstown Trails Trust	Mark Williams	Marginal strips	QTT opposes the identification of marginal strips for inclusion in the CMS (on a parcel by parcel basis) and instead proposes that all marginal strips are considered for assessment criteria. Between 1990 and 1 July 2007, marginal strips have not been defined where the Crown disposed of land subject to Part IVA of the Conservation Act, but their existence should be acknowledged and submissions on their inclusion in the CMS be accepted.	Include all marginal strips in the CMS	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	15	Queenstown Trails Trust	Mark Williams	Conservation Area - Mt Creighton	QTT supports the inclusion of this parcel in the CMS and wishes to be included in discussions on the future management plan addressing recreation opportunities on this parcel (and the public easement 838778 created under Tenure Review in 2018). This is an opportunity for a world-class backcountry hiking and biking experience along a public easement created under tenure review of Mt Crichton Station in 2018 and could mirror the success of The Old Ghost Road and Papsaroa Track. Developing a dual use track opens up more funding opportunities whereas the current lack of appetite/funding means that the public access created under tenure review is unable to be realised and will remain neglected for the foreseeable future.	Include QTT in discussions about future management plan for this parcel.	Accept Conservation Area Mt Creighton has been included in the CMS and the limitation retained so further investigation can be made into the recreational opportunities for this p&w. However, it has been reworded to read: 'Conservation Area - Mt Creighton: - subject to recreational opportunities feasibility study outcomes.'

Places	Table 2.3: Access to Western Lakes and Mountains Place	104	16	Queenstown Trails Trust	Mark Williams	Moke Lake Recreation Reserve	QTT opposes the removal of cycling on the Peninsula portion of the Moke Lake Loop Track. The Moke Lake circuit is a popular trail for families and is used by thousands of visitors per year. It is very achievable for all ages and abilities. Removing the Peninsula portion cuts off the ability to complete the circuit. Requiring cyclists to turn around to return on the same section of track creates a significant safety issue due to an increased number of users coming face to face on a narrow and sometimes exposed stretch on the western edge of the lake.	Retain the complete Moke Lake Loop in the CMS	Reject Moke Lake Recreation Reserve has been retained however the peninsula portion of the Moke Lake Loop Track is excluded due to health and safety concerns and the track not being suitable for shared use.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	17	Queenstown Trails Trust	Mark Williams	Conservation Area - Tuckers Beach	This parcel is well away from the threatened braided river ecosystem. The Trust supports excluding public access to the river gravels which are the breeding ground for several threatened species - suggest adding this limitation to Tuckers Beach Wildlife Management Area instead.	Remove the limitation 'excluding threatened braided river system' (and reflecting this limitation against Tuckers Beach Wildlife Management Area (where river gravels are a nesting site for endangered bird species).	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	104	18	Queenstown Trails Trust	Mark Williams	Tuckers Beach Wildlife Management Area	There seems to be some confusion at the Tuckers Beach Wildlife Management Reserve surrounding the presence of braided river ecosystems. It is not on the Conservation Area - Tuckers Beach, but is within the Tuckers Beach Wildlife Management Area.	Add a limitation to this parcel 'excluding threatened braided river ecosystem'	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Specific Policy Requirements	3.3. MTB-intro text	104	19	Queenstown Trails Trust	Mark Williams	E-bikes	Support the inclusion of e-bikes in Policy 3.3. The growth of E-bikes has enabled many more people to enjoy the conservation estate. The Trust supports the use of pedal assist e-bikes up to 300W as per the NZTA definition.	No specific relief sought.	Accept
Specific Policy Requirements	Policy 3.3.4	104	20	Queenstown Trails Trust	Mark Williams	Criterion (a)	Oppose policy 3.3.4(a) that states that DOC must follow statutory amendment or review process. This is the root cause of the current CMS problem and is not addressed in this proposal.	Delete Policy 3.3.4(a)	Reject See standard response.
General	general comments	104	21	Queenstown Trails Trust	Mark Williams		Linking the addition of potential cycle trail locations to a statutory process does nothing to fix the problem we find ourselves in now.	Insert the following at the top of all Part Two Tables: <i>"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" (noting submitter's request re amendments to 3.3.4).</i>	Reject See standard response.
General	general comments	104	22	Queenstown Trails Trust	Mark Williams	Reference to 'concerns raised' in section 3.3	Concerns raised' is unspecific and implies no use of evidence-based assessment, no specialist knowledge. Any person or body could raise a concern. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' have been deleted.
Specific Policy Requirements	Policy 3.3.4	104	23	Queenstown Trails Trust	Mark Williams	Criterion (c)(i)	There is a focus on assessing negative effects. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 as assessment criteria.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering <u>the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	104	24	Queenstown Trails Trust	Mark Williams		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on pCl&w.	Delete Policy 3.3.5 Or Amend Policy 3.3.5 as follows: <i>"May consider the following criteria where appropriate, when assessing, whether to develop or allow a new cycle trail..."</i>	Reject See standard response. The criteria in Policy 3.3.5 (now 3.3.6) have been strengthened to allow the proposed bike tracks to be added to the CMS and the consideration and assessment to be undertaken later. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	104	25	Queenstown Trails Trust	Mark Williams	Criterion (b)	The assessment criteria should be applied as appropriate, that is, with discretion and only where applicable to the concerned pCl&w.	Amend Policy 3.3.5(b) as follows: <i>"If the long term effects of climate change, including flooding and coastal erosion are relevant."</i>	Reject in part Policy 3.3.5 (now 3.3.6) b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.' If, at the beginning of the Policy provides for the assessment of relevance.
Specific Policy Requirements	Policy 3.3.5	104	26	Queenstown Trails Trust	Mark Williams	Criterion (c)	The assessment criteria should be applied as appropriate, that is, with discretion and only where applicable to the concerned pCl&w.	Amend Policy 3.3.5(c) as follows: <i>"If specialist reports are required, to assess the adverse effects of the cycle track or trail on pCl&w."</i>	Reject This change is not required as the CMS only applies to land that is pCl&w and is detailed at the start of Policy 3.3.5 (now 3.3.6).
Specific Policy Requirements	Policy 3.3.5	104	27	Queenstown Trails Trust	Mark Williams	Criterion (i)	It is often the case in small and community led cycle trail projects that funding is sought after land access and approval is gained. Fundraising efforts can only commence once the consent is granted and maintenance funding is often an ongoing activity.	Amend Policy 3.3.5(i) as follows: <i>"If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated."</i>	Accept The Policy has been reworded as requested.
Specific Policy Requirements	Policy 3.3.5	104	28	Queenstown Trails Trust	Mark Williams	New criterion	The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: <i>"(i) The positive effects on the purpose and outcomes for the place and the wellbeing of its people."</i>	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	104	29	Queenstown Trails Trust	Mark Williams	Conservation Area - Greenstone	The Trust opposes the exclusion of this parcel from the CMS. The Trust has engaged with Aukaha and has received cautious support from rūnanga for public access to the marginal strip between the Greenstone Stock Bridge and Black Gorge, Effin Bay, Lake Wakatipu/Waikātipu-wai-Mīroki, subject to more detailed information. DOC mapping for Otago does not identify this parcel of marginal strip, the Trust has researched the certificate of title which is subject to Part IVA of the Conservation Act (see submission for further extensive details on this matter).	No relief specified but presumably to include this parcel in Table 2.3 of the CMS.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.

Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautō Place	104	30	Queenstown Trails Trust	Mark Williams	CR - Leaseback - Ngāi Tahu Lease back Area (2892717)	The Trust has engaged with rūnanga to consider this route as far as the Pass Burn Saddle. For most of its length, the proposed alignment follows an unformed legal road. The Trust considers that the existing track is suitable for shared use as far as Pass Burn. The Trust would support a seasonal period for shared use on this trail, which has proved successful on the Heaphy Track. The Greenstone-Mavora walkway between the Pass Burn and Mavora Lakes is a wide-open valley with long sightlines, zero conflict and limited use. The existence of an unformed legal road overlaying and adjacent to the existing track supports cycling on this route. Sharing the trail where it deviates from the unformed legal road is likely to result in far better conservation outcomes than forcing the development of a new parallel trail.	Asks that DOC reconsider its position to allow further positive discussion of this kaupapa to enable rūnanga support for sharing the existing alignment.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautō Place	104	31	Queenstown Trails Trust	Mark Williams	Conservation Area - Mavora Lakes (Maniapōpōre/Hikuraki)	The Trust opposes that the west side of South Mavora Lake is not suitable for cycling. The Southland Murihiku CMS contradicts DOC's position on this trail, where table 2.2. on page 75 suggests mountain biking is permitted from the North Mavora Swing Bridge to the Kiwi Burn Swing Bridge	Seek that cycling on the Mavora Walkway from the bridge downstream is supported, which would allow a connection to the Kiwi Burn Track for a proposed route to Te Anau.	Accept in part After careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautō Place	104	32	Queenstown Trails Trust	Mark Williams	North Motatapu Conservation Area	The establishment of the backcountry ski-touring route and hut network from Treble Cone to Coronet Peak via a series of 'turo' huts provides the perfect opportunity to develop a new recreational opportunity along the same alignment. It would complement the existing ski touring and alpine skiing activities at the back of a commercial ski area and would enable more people to enjoy a backcountry experience. Cyclists also expect to enjoy a remote, quiet and tranquil location and should not be excluded from this place.	No specific relief sought but presumably include North Motatapu Conservation Area in the CMS.	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
General	general comments	108	1	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull		The conservation values of pci&w MUST take priority over any and all proposed recreation facilities.	Rewording from this Partial Review must follow that principle, which is what 'Conservation' is all about.	Accept in part The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
General	general comments	108	2	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull		The re-wording of the Otago CMS resulting from this Partial Review must add be such that any cycle trail can be constructed as of right, needing only token consultation to be approved.	No specific relief sought.	Accept in part The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
General	general comments	108	3	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Public consultation	Public consultation must be mandatory for all new trail proposals	No specific relief sought.	Accept in part Not all proposals will require further public consultation, for example if they are a minor addition or a small joining track. Engagement and consultation is required with Rūnaka and Te Rūnanga o Ngāi Tahu and the conservation board, this will help determine the level of assessment required including public notification.
General	general comments	108	4	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull		General support for inclusion of pci&w and marginal strips to allow for consideration of MTB and similar activities - in the abstract.	No specific relief sought.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	108	5	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull		Support allowing MTB activities in pci&w on existing 4WD tracks, of which there are many hundreds of km in the Otago Region. Note that these are CONSERVATION lands, not recreation reserves.	No specific relief sought.	Accept and noted.
General	general comments	108	6	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	E-bikes	Support the inclusion/allowance of E-bikes in the Otago CMS.	No specific relief sought.	Accept
General	general comments	108	7	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Horse riding	Note that virtually no mention is made of horse riding.	Partial review must also take into consideration the requirements of the horse riding and trekking fraternity. Wording to account for this group of users should be included wherever appropriate.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
Places	Table 2.3: Access to Western Lakes and Mountains Place	108	8	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review. Environmental implications are enormous. Notwithstanding Policies 3.3.4 and 3.3.5, much more emphasis should be given, in this review, to dealing with these proposals if and when they are put up for public comment.	Remove all reference to 'proposed tracks' in Table 2.3. All such proposals are adequately dealt with under Part 3.3 and specific policies therein.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	108	9	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review. Environmental implications are enormous. Notwithstanding Policies 3.3.4 and 3.3.5, much more emphasis should be given, in this review, to dealing with these proposals if and when they are put up for public comment.	Remove all reference to 'proposed tracks' in Table 2.2. All such proposals are adequately dealt with under Part 3.3 and specific policies therein.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.4: Access to Central Otago Uplands Place	108	10	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review. Environmental implications are enormous. Notwithstanding Policies 3.3.4 and 3.3.5, much more emphasis should be given, in this review, to dealing with these proposals if and when they are put up for public comment.	Remove all reference to 'proposed tracks' in Table 2.4. All such proposals are adequately dealt with under Part 3.3 and specific policies therein.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.

Places	Table 2.5: Access to Old Man Range/Kopuawai, Old Woman Range, and Garvie Mountains Place	108	11	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review. Environmental implications are enormous. Notwithstanding Policies 3.3.4 and 3.3.5, much more emphasis should be given, in this review, to dealing with these proposals if and when they are put up for public comment.	Remove all reference to 'proposed tracks' in Table 2.5. All such proposals are adequately dealt with under Part 3.3 and specific policies therein.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.6: Access to Central Otago Drylands Place	108	12	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review. Environmental implications are enormous. Notwithstanding Policies 3.3.4 and 3.3.5, much more emphasis should be given, in this review, to dealing with these proposals if and when they are put up for public comment.	Remove all reference to 'proposed tracks' in Table 2.6. All such proposals are adequately dealt with under Part 3.3 and specific policies therein.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	108	13	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review. Environmental implications are enormous. Notwithstanding Policies 3.3.4 and 3.3.5, much more emphasis should be given, in this review, to dealing with these proposals if and when they are put up for public comment.	Remove all reference to 'proposed tracks' in Table 2.7. All such proposals are adequately dealt with under Part 3.3 and specific policies therein.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.8: Access to Catlins Place	108	14	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review. Environmental implications are enormous. Notwithstanding Policies 3.3.4 and 3.3.5, much more emphasis should be given, in this review, to dealing with these proposals if and when they are put up for public comment.	Remove all reference to 'proposed tracks' in Table 2.8. All such proposals are adequately dealt with under Part 3.3 and specific policies therein.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	108	15	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	'Proposed tracks' as listed in the table are in most instances quite unknown to the general public, and many have just appeared in response to this Review.	List all proposed trails in a separate table. Then the public can more clearly identify them, and respond to such proposals when they are put out for public submissions.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	108	16	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Maungatika Trail	Oppose the Maungatika Trail for range of reasons (see attachment to submission)	Change the status of Hawea Conservation Park from 'for discussion' to 'not allowed'; OR limit to existing tracks (e.g. Boundary Creek Track)	Reject After careful consideration Hawea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	108	17	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Maungatika Trail	Oppose the Maungatika Trail for range of reasons (see attachment to submission)	Amend the quoted extract from the CMS outcome: "...leaving the areas west of the Hunter River valley and along the main divide of the Southern Alps/Kā Tiritiri o te Moana, the McKerrow range, and the region between the Dingle Burn and Timaru River, for users who appreciate the remoteness and natural quiet."	Reject. Outcome statements are not within the scope of this partial review. After careful consideration Hawea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	108	18	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Mt Creighton Conservation Area	There are many km of proposed tracks shown within this parcel. Development to this extent will have a huge negative impact on the conservation values of this area. Should any proposals even be considered, then the strictest mitigation measures possible must be imposed.	If 'proposed tracks' are removed from Tables (sub pt 108/8) then no action beyond that is needed. Alternatively, amend the wording for the entry of this parcel to say "Proposed tracks subject to future management plan (or other appropriate document) which places conservation values ahead of any potential recreation values on this parcel."	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	108	19	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Mahaka Katia Scientific Reserve	This scientific reserve was established to protect extremely vulnerable and endangered plants. It is utter folly to even contemplate building cycle trails on this reserve. An alternative route exists at the foot of the high terrace.	Amend the CMS to prohibit any interference with this reserve. Access to the reserve from any possible MTB tracks along the terrace foot must be made impossible unless by foot.	Accept Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Specific Policy Requirements	3.3. MTB-intro text	108	20	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Paragraph 4	Construction of a downhill mountain bike track was commenced at Kidds Bush without the permission or knowledge of the Department. This gives little confidence that the 'partnership' alluded to [in this paragraph] is actually working; or that the MTB fraternity is minded to follow the rules.	No specific relief sought.	Noted For the most part the biking community work very closely with the Department. Undertaking unauthorised activity is an offence under Section 39 of the Conservation Act 1987.
Specific Policy Requirements	Policy 3.3.1	108	21	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Reference to proposed tracks	Should allow cycling in all those places listed in the Tables can be interpreted to mean that "proposed" trails in those Tables 'should' be allowed to proceed. While conditions may be imposed (as per section 3.3.4 etc.), this section needs to be totally unambiguous.	Remove reference to 'proposed' trails from the tables (see 108.8) AND replace 'should' with 'May' in this policy.	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d) and are used in decision making policies particular around authorisations, such as guided biking. Should policies have a strong expectation of outcome. A 'may' policy has more discretion, particularly in ensuring consistency with the Part Two Tables. The Policy will remain 'Should allow'. This policy is not about the consideration of bike trails that is covered under Policy 3.3.6.
Specific Policy Requirements	Policy 3.3.2	108	22	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Support policy	We fully support use (and limited development or modification) of any and all existing 4WD tracks, formed roads, and marginal strips for cycling, and for horse riding.	Retain policy	Accept in part This Policy is now 3.3.3 and has been revised to read 'Where biking is restricted to tracks or roads, bikers must remain on the formed bike track or road at all times.' Horse riding is out of scope of this partial review.

Specific Policy Requirements	Policy 3.3.3	108	23	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull		Promotion of such opportunities can lead the Department into becoming even more over-committed and distracted from its core purpose: conservation.	Amend policy - replace 'promote' with 'publicise' and delete the last sentence after the word 'website'.	Reject in part Promoting where biking can occur on the Department's website and working with the bike clubs and visitor information provides is an important tool in managing the activity of biking to ensure it is undertaken in the appropriate places with consideration to other users of the area. The Policy is now 3.3.4 and has been reworded to read 'Promote opportunities for approved bike tracks on public conservation lands and waters in Otago via the Department's website; and through liaison with biking advocates and visitor information providers.'
Specific Policy Requirements	Policy 3.3.4	108	24	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull		This and the following sections are the most important parts of the entire partial review. They must be worded to ensure that conservation values of the p&w are first and foremost; and that public consultation is fundamental.	Amend policy - replace 'should' with 'must'	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. Must is not provide for in the Conservation General Policy.
Specific Policy Requirements	Policy 3.3.5	108	25	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull		This and the following sections are the most important parts of the entire partial review. They must be worded to ensure that conservation values of the p&w are first and foremost; and that public consultation is fundamental.	Amend policy 3.3.5 to replace 'should' with 'must'	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. Must is not provide for in the Conservation General Policy. The Policy will remain 'should allow'.
Specific Policy Requirements	Policy 3.3.5	108	26	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Criterion (b)	A vital part of all climate change considerations is the carbon footprint [of an activity/proposal]. Government legislation aims for carbon neutrality. For example, NZTA guidelines require all new infrastructure projects to consider carbon emissions during cost-benefit analysis.	Amend policy to include a requirement that a carbon budget be prepared for all new cycle trail construction projects, and carbon offset or mitigation measures be a requirement for gaining approval, just as projected demand and financial security are requirements.	Accept in part Policy 3.3.5 (now 3.3.6 b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.'
Specific Policy Requirements	Policy 3.3.6	108	27	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Whether Department should build cycle trails	The Department of Conservation should not be in the business of building cycle trails. We have hundreds of indigenous species going extinct; a kilometre of cycle trail will buy a lot of predator traps.	Amend policy to delete "construct and maintain, and..." but by all means grant authorisations subject to the conditions as outlined.	Reject DOC does have a responsibility to enable recreation opportunities and the CMS needs to reflect there are times when the construction and maintenance of trails built by the DOC is required subject to the same scrutiny as those built by others.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	108	28	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	North Motatapu Conservation Area	Support the inclusion of North Motatapu Conservation Area in the 'not supported' category.	Retain exclusion of North Motatapu Conservation Area from the Tables.	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	108	29	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Hāwea Conservation Park	All the grounds on which cycling is not allowed in the Greenstone and Manawapopore/Hikuraki Conservation Areas equally apply to the Hāwea Conservation Park	Change the status of Hāwea Conservation Park from 'for discussion' to 'not supported'	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	108	30	Royal Forest and Bird Protection Society (Inc)	Ian Turnbull	Consistency issues	All the grounds for excluding the North Motatapu Conservation Area apply equally well to many of the other areas within the 'supported' category. This is totally inconsistent.	Re-assess all areas with conservation and recreation values equivalent to those of the North Motatapu Conservation Area, and transfer them to the 'not supported' category	Reject After careful consideration, most proposed areas of p&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	109	1	NZSki Limited	Nigel Kerr	Coronet Peak Recreation Reserve	NZSki supports the inclusion of Coronet Peak Recreation Reserve as a place for access	Retain Table 2.3 where it includes Coronet Peak Recreation Reserve as an area of land for motorised vehicle access on or through p&w	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	109	2	NZSki Limited	Nigel Kerr	Coronet Peak Recreation Reserve	Supports the removal of specific tracks/trails relating to Coronet Peak Recreation Reserve	Retain Table 2.3 where it includes Coronet Peak Recreation Reserve as an area of land for motorised vehicle access on or through p&w	Accept
Specific Policy Requirements	Policy 3.3.1	109	3	NZSki Limited	Nigel Kerr		NZSki opposes wording as drafted due to inconsistency with the descriptive phrasing used within this part of the CMS of the proposed draft. Other policies include (reference to) p&w. Inconsistency may lead to confusion and misinterpretation or contention.	Amend 3.3.1 and any policy that requires the consistent application of describing the trails, tracks, lands, roads etc. E.g. 3.3.1 Should allow independent mountain biking... only on the tracks, trails and named roads or other areas, or other parcels of public conservation land or water identified in:...	Accept in part Policy 3.3.1 is changed to allow independent biking and the ability to grant concessions for guided biking on tracks and roads purposely formed and maintained for biking use.
Specific Policy Requirements	Policy 3.3.5	109	4	NZSki Limited	Nigel Kerr	Criterion (h)	NZSki can appreciate the rationale of this criterion, but considers that it may be challenging to qualify and could be subject to multiple interpretations and variables beyond influence or control. NZSki would like to understand how this is expected to be demonstrated by a stakeholder wishing to develop/propose a trail, and what level of qualification will be required for both aspects of the criterion, but more specifically the sustainability. How is that to be predicted for the lifetime of an asset/facility or within the lifetime of the CMS?	Amend 3.3.5(h) to include rationale for the purpose of the criterion by adding detail within the rationale of Part Three - Specific Policy Requirements. Amendment should include how (the criterion) is expected to be demonstrated, e.g., investigations, market research, time periods for either.	Accept in part Policy 3.3.5(h) is required to determine the right opportunity is being provided in the right place. It is also elsewhere in the CMS. In particular Section 1.5.3 Recreation, Objective 1.5.3.1 and would be applied to other developments such as walking tracks and visitor facilities.
Specific Policy Requirements	Policy 3.3.7	109	5	NZSki Limited	Nigel Kerr		NZSki opposes the policy as it is currently worded. The policy enables a carte blanche approach [where controls can be imposed] without any rationale as to why [the controls] may be required. Currently no certainty for visitors or stakeholders in how it is currently drafted.	Amend 3.3.7 to give effect to submission point. Could consider combining with 3.3.8 to give reasoning to the need to implement controls. OR: 3.3.7 May control the use of mountain bikes and e-bikes on any cycle tracks and trails on public conservation lands and waters because of the following situations: a) there is a health and safety risk; b) there is a fire risk; c) adverse effects are evident or likely; d) priorities change for the provision of trails or tracks; e) where damage to the structure of the trails or tracks is evident or likely. Measures to control may include a) trial periods, b) annual and seasonal restrictions on use (e.g. daylight use only), d) limits on numbers; and e) requiring one-way flow.	Reject in part Policy 3.3.7 provides guidance for controls to be included in an authorisation to build a bike track, if they are considered necessary to manage adverse effects. The proposed change is not required.
Places	Table 2.3: Access to Western Lakes and Mountains Place	110	1	Bike Glendhu Limited	Simon Peirce	Marginal Strip - Fern Burn	BGL supports inclusion of the Marginal Strip - Fern Burn in Table 2.3 of the Otago CMS	Retain 'Marginal Strip - Fern Burn' in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	110	2	Bike Glendhu Limited	Simon Peirce	Mapping	BGL supports mapping of the trail 'Kakariki Family Loop' as shown on the planning maps.	Retain mapping	Accept in part The mapping are not part of the CMS and were only used to provide submitters with context of the proposals.

Specific Policy Requirements	3.3. MTB-intro text	110	3	Bike Glendhu Limited	Simon Peirce	E-bikes	BGL supports the references to the term e-biking (cycling) in Part 3 - Specific Policy Requirements and throughout the partial review	Retain wording	Accept
General	general comments	111	1		Nicky Martin	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	111	2		Nicky Martin		Oppose all amendments to Policy 3.3.4	No relief specified	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	111	3		Nicky Martin		Support removal of 'should follow the statutory review process' from Policy 3.3.4	No relief specified	Reject See standard response.
General	general comments	111	4		Nicky Martin	Use of section 53(2) of the Conservation Act	Support DOC and the Director General using its powers under Section 53(2) of the Conservation Act 1987 and the definition of an 'Authorised Utility' and Policy 3.2.3 to give approval to the cycle trails currently funded and designed in Otago in the same way they have done for the Bennett's Bluff Carpark	No relief specified	Reject See standard response.
General	general comments	139	1		Katrina Gardiner		I urge DOC to allow access for bikers on conservation land from Tuckers Beach to Arthur's Point and from Gibbston to Cromwell.	Enable this access for cycling.	Accept in part After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	175	1		Malcolm Farry		Support the submission on the Walking Tracks	No relief specified	Reject This partial review is addressing bike tracks not walking tracks.
General	general comments	197	1		Robert and Glenys Young		Support QTT trail proposals. Trails provide benefits in providing opportunities for cyclists and walkers to gain greater access to our landscapes and heritage. Growing the trail network appears to tick all the boxes, including raising conservation awareness.	No relief specified	Accept in part After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	211	1		Colin CW Cassels	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	211	2		Colin CW Cassels	Support particular trail	Support the proposed 'Tuckers Beach/Lower Shotover Track'. This track must proceed with all haste.	No relief specified	Accept After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	211	3		Colin CW Cassels	Criterion (a)	Oppose policy 3.3.4(a) that states that DOC [must] follow statutory amendment or review [process].	Delete Policy 3.3.4	Reject See standard response.
General	general comments	397	1	Glenorchy Trails Trust (GYTT)	Matt Belcher		Supports all of the tracks included in the draft CMS	No relief specified	Accept in part After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	397	2	Glenorchy Trails Trust (GYTT)	Matt Belcher	E-bikes	Supports equal treatment of e-bikes and traditional bikes	No specific relief sought.	Accept
General	general comments	397	3	Glenorchy Trails Trust (GYTT)	Matt Belcher	Mapping	Support all tracks indicated on the interactive mapping across Otago	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	397	4	Glenorchy Trails Trust (GYTT)	Matt Belcher	Marginal strips		GYTT requests that all marginal strips should be considered for assessment criteria, rather than identifying individual parcels for inclusion.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	397	5	Glenorchy Trails Trust (GYTT)	Matt Belcher	Conservation Area - Kinloch Foreshore	[This parcel is included in Table 2.3 with a limitation to Kinloch Road only.] Kinloch Road does not traverse this parcel of land so the reference to it is confusing and should be deleted.	Amend the entry for 'Conservation Area - Kinloch Foreshore' to delete the reference "Kinloch Road only".	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	397	6	Glenorchy Trails Trust (GYTT)	Matt Belcher	Conservation Area - Mt Creighton	[This parcel is included in Table 2.3 with a limitation "proposed tracks subject to future management plan (or other appropriate document) addressing recreation opportunities on this parcel".] GYTT does not support any area being subject to further criteria over and above the new policies in Section 3.3.	Amend the entry for 'Conservation Area - Mt Creighton' to delete the reference to "proposed tracks subject to future management plan (or other appropriate document) addressing recreation opportunities on this parcel"	Accept in part Conservation Area Mt Creighton has been included in the CMS and the limitation retained so further investigation can be made into the recreational opportunities for this p&f&w. However it has been reworded to read: "Conservation Area - Mt Creighton: - subject to recreational opportunities feasibility study outcomes."
Places	Table 2.3: Access to Western Lakes and Mountains Place	397	7	Glenorchy Trails Trust (GYTT)	Matt Belcher	Conservation Area - Rees River	[This parcel is included in Table 2.3 with a limitation "must avoid braided river ecosystem".] GYTT is concerned that the "braided river ecosystem" is undefined, and could in fact refer to the entire parcel.	Amend the entry for 'Conservation Area - Rees River' to delete the reference "must avoid braided river ecosystem"	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	397	8	Glenorchy Trails Trust (GYTT)	Matt Belcher	Diamond Lake and Lake Reid Wildlife Management Reserve	[This parcel is included in Table 2.3 with a limitation "limited to - Diamond Lake (Wakatipu) amenity area access road; Paradise Road; and Diamond Creek Track (eastern)"] Restricting access as 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. (Refer Figure in submission)	No specific relief sought - presumably to delete limitation on this parcel.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Table 2.3: Access to Western Lakes and Mountains Place	397	9	Glenorchy Trails Trust (GYTT)	Matt Belcher	Diamond Lake Recreation Reserve	[This parcel is included in Table 2.3 with a limitation 'limited to - Diamond Lake Road'] Restricting access as 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. (Refer Figure in submission)	No specific relief sought - presumably to delete limitation on this parcel.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	397	10	Glenorchy Trails Trust (GYTT)	Matt Belcher	Glenorchy Lagoon Wildlife Management Reserve	[This parcel is included in Table 2.3 with a limitation 'limited to existing track (excluding the Glenorchy Lagoon Walkway).'] 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 the existing track if/where necessary to access the road reserve to the north (refer Figure 2 in submission)	Amend the entry for 'Glenorchy Lagoon Wildlife Management Reserve' 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).	Accept The limitation has been revised to read 'Glenorchy Lagoon Wildlife Management Reserve, excluding - boardwalk sections of the Glenorchy Lagoon Walkway'.
Places	Table 2.3: Access to Western Lakes and Mountains Place	397	11	Glenorchy Trails Trust (GYTT)	Matt Belcher	Marginal Strip - Dart River/Te Awa Whakaitupu (2800647)	[This parcel is included in Table 2.3 with a limitation 'excluding paved village site which is of significance to Ngāi Tahu and other areas of cultural significance within this parcel.'] The reference to '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.	No specific relief sought - presumably to delete or clarify the limitation on this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	397	12	Glenorchy Trails Trust (GYTT)	Matt Belcher		GYTT does not support the amendments to Policy 3.3.4 and the insertion of new policies 3.3.5 - 3.3.8	Remove all additional policy detail within this section, retaining only 3.3.4; and Amend 3.3.4 to remove the statutory review clause; and Maintain the existing assessment criteria with no addition to policies 3.3.5 - 3.3.8	Reject The criteria in Policy 3.3.5 (now 3.3.6) have been strengthened to allow the proposed bike tracks to be added to the CMS and the consideration and assessment to be undertaken later. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review. See standard response.
Specific Policy Requirements	Policy 3.3.4	397	13	Glenorchy Trails Trust (GYTT)	Matt Belcher	Criterion (a)	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.	Delete 3.3.4(a)	Reject See standard response.
General	general comments	397	14	Glenorchy Trails Trust (GYTT)	Matt Belcher	Reference to 'concerns raised' in section 3.3	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. [Submission Point 397.15]	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised has been removed.'
Specific Policy Requirements	Policy 3.3.6	397	15	Glenorchy Trails Trust (GYTT)	Matt Belcher	Criterion (b)	'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.	Amend Policy 3.3.6(b) as follows: "b) implementing mechanisms to manage the adverse effects of the proposed trails, including compliance with the latest version of the Department's cycle trail standards, as commonly accepted national trail design guides.	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
Specific Policy Requirements	Policy 3.3.4	397	16	Glenorchy Trails Trust (GYTT)	Matt Belcher	Criterion (c)	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. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive concerns are absent. GYTT requests that these are taken into account and related to broader wellbeing in Policy 3.3.4 (c)(i) and Policy 3.3.5(i)	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated."	Accept in part The positive effects for both public health and the financial benefits of cycling opportunities are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for maintain biking opportunities while ensuring adverse effects are addressed. Policy 3.3 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	397	17	Glenorchy Trails Trust (GYTT)	Matt Belcher	New criterion	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. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive concerns are absent. GYTT requests that these are taken into account and related to broader wellbeing in Policy 3.3.4 (c)(i) and Policy 3.3.5(i)	Amend Policy 3.3.5 to insert a new criterion: "j) The positive effects on the purpose and outcomes for the place and the wellbeing of its people."	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	397	18	Glenorchy Trails Trust (GYTT)	Matt Belcher		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 3.3.4(c) to avoid this. Alternatively, the assessment could be made informal and optional. If the criteria must be amended, a focus on the four wellbeing's of social, cultural, environmental and economic wellbeing of our communities is recommended.	Delete Policy 3.3.5 Or Amend Policy 3.3.5 as follows: "May consider the following criteria where appropriate, when assessing whether to develop or allow a new cycle trail..."	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered cycle trail proposals. Discretion applies to those criteria that start with 'If...required'. The four wellbeing's are reflected in the Conservation Act.
Specific Policy Requirements	Policy 3.3.5	397	19	Glenorchy Trails Trust (GYTT)	Matt Belcher	Criterion (i)	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.	Amend Policy 3.3.5(i) as follows: "If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated."	Accept The Policy has been reworded as requested.
General	general comments	397	20	Glenorchy Trails Trust (GYTT)	Matt Belcher	Use of limitations on parcel entries	If there are any adverse effects associated with a trail within [parcels of pckw], this will be identified and dealt with through the policies proposed in Section 3.3. and therefore, does not need to be restricted at this stage of the process.	No specific relief sought aside from deletion of limitations from parcels referenced in submission and captured elsewhere in this summary.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
General	general comments	397	21	Glenorchy Trails Trust (GYTT)	Matt Belcher	Top of all Part Two Tables	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.	Either insert the following at the beginning of each Table in Part Two: "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." [noting submission point 397.13 seeking amendments to Policy 3.3.4] Or in the alternative: 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 or reviewed or updated during the term of this CMS as detailed in 3.3.4." [noting submission point 397.13 seeking amendments to Policy 3.3.4]	Reject See standard response.

Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	399	1	The Maungatika Trust	Scott Rainsford	Maungatika Trail	We support the Maungatika Track. (Refer submission for extensive detail about the proposed track).	Provide for this trail in the CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	399	2	The Maungatika Trust	Scott Rainsford	Mapping	Support all tracks shown on the DOC interactive mapping.	Provide for these trails in the CMS	Accept After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	399	3	The Maungatika Trust	Scott Rainsford		Oppose all amendments to Policy 3.3.4.	No specific relief sought - see other submission points	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	399	4	The Maungatika Trust	Scott Rainsford	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	399	5	The Maungatika Trust	Scott Rainsford		Limiting the addition of potential cycle trail locations to a statutory process must stop. Otherwise, we will see the wasteful cost of the Otago Partial CMS review repeated again and again. Refer the legal advice on DOC's interpretation of the Conservation General Policy 9c and of Section 17 of the Conservation Act. A more broad based identification system gets around the need to detail every trail down to the exact parcels. Refer Policy 2.8.6 for the Catlins Area for a good example. There is nothing stopping DOC making this change.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Annexiv	Reject See standard response. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Specific Policy Requirements	3.3. MTB-intro text	399	6	The Maungatika Trust	Scott Rainsford	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unpecific use of language. This should be deleted from all parts of Policy 3.3, as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' has been deleted.
Specific Policy Requirements	Policy 3.3.4	399	7	The Maungatika Trust	Scott Rainsford	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of possible cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	399	8	The Maungatika Trust	Scott Rainsford	Criterion (c)(i)	There is a lack of balance (in the criteria) when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "... which may require considering the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated."	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	399	9	The Maungatika Trust	Scott Rainsford		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on pcl&w.	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The partial review has added parcels of pcl&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	399	10	The Maungatika Trust	Scott Rainsford		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: "May consider the following criteria where appropriate, when assessing whether to develop or allow a new cycle trail..."	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorities. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered cycle trail proposals. Discretion applies to those criteria that start with 'If...required'.
Specific Policy Requirements	Policy 3.3.5	399	11	The Maungatika Trust	Scott Rainsford	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on pcl&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on pcl&w (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of pcl&w	Reject in part Policy 3.3.5 (now 3.3.6) b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.' If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is pcl&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Rūnanga o Ngāi Tahu is required as part of the proposal and it only covers the pcl&w.
Specific Policy Requirements	Policy 3.3.5	399	12	The Maungatika Trust	Scott Rainsford	Criterion (i)	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.	Amend Policy 3.3.5(i) as follows: "If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated."	Accept The 'ability to generate' has been added to the policy.
Specific Policy Requirements	Policy 3.3.5	399	13	The Maungatika Trust	Scott Rainsford	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " (i) The positive effects on the purpose and outcomes for the place."	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.

Specific Policy Requirements	Policy 3.3.6	399	14	The Maungatika Trust	Scott Rainsford	Criterion (b)	'Concerns raised' is such a broad and unspecific use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: "b) implementing mechanisms to manage the adverse effects of concerns raised , including compliance with the latest version of the Department's cycle trail standards or commonly accepted national trail design guides ,"	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
Places	Table 2.3: Access to Western Lakes and Mountains Place	400	1		Paul Drummond	Conservation Area - Big Beach/Shotover River	Oppose the approach of the draft [due to the potential for] visual effects, environmental effects, and the increased fire risk.	Careful consideration must be given to the number of bike tracks and the visual effects and environmental effects of these.	Reject in part The Policies detailed in 3.3 ensure the appropriate considerations and assessments, including landscape and landform are completed prior to a track being proposed.
General	general comments	468	1		Cath Gilmour		Concern that some parcels of p&f&w associated with several trails proposed for QLD and COD lands currently being excluded from use for cycling, including the Kawarau Gorge Trail, Tucker Beach - Arthurs Point - Arrowtown Trail, and others. It is difficult to understand why it appears that DOC is not supporting this vital project (and others) that ensure public access to what is public land, where the taonga DOC is mandated to protect can be protected. I support the work of the Queenstown Trails Trust and others involved in this trail network, and support QTT submission.	Please ensure the CMS reflects this [QTT submission?] and allow cycleway access, with conditions as required to safeguard our natural treasures - across the areas already identified within the trails trusts' plans.	Accept in part. The partial review has allowed for a large number of proposals to be put forward and included in the CMS to allow for the discussion of their development at a later date and allowing for the infrastructure to be extended. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.4: Access to Central Otago Uplands Place	475	1	Metherell Farm Ltd	Greg and Karen Metherell	Conservation Area - Otekaieke Access Strip (2809840)	Opposed to this section [of a proposed track?] as it will go directly through farmland. The track which is marked on the map is unpassable. There is a wild pig problem on the land around the track and the landowners allow hunting which could make it unsafe for cyclists.	If riders ring prior to their trip, access is usually permitted as long as it is not lambing, or calving season and they don't interfere with the working of the station.	Reject Conservation Area Otekaieke Access Strip has been retained. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including consultation with adjoining landowners.
Places	Table 2.4: Access to Central Otago Uplands Place	475	2	Metherell Farm Ltd	Greg and Karen Metherell	Marginal Strip - Waitaki River (2805627)	Noted that the bridle track part was taken out of the title in 1964 and is now part of Kenmore Station. During certain times of the year, it is a very dangerous track with the river rising quickly, as well as very icy in the winter. Proposed route is through a working farm.	If riders ring prior to their trip, access is usually permitted as long as it is not lambing, or calving season and they don't interfere with the working of the station.	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	476	1	Clutha Gold Trail Charitable Trust	Murray Paterson	Clutha Gold Trail	Support the Clutha Gold Trail extension project between Lawrence and Lake Waikaha including all route deviations across p&f&w.	No specific relief sought	Accept After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	476	2	Clutha Gold Trail Charitable Trust	Murray Paterson	Mapping	Support all tracks indicated on the interactive mapping across Otago	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	476	3	Clutha Gold Trail Charitable Trust	Murray Paterson		Oppose all amendments to Policy 3.3.4	No specific relief sought	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	476	4	Clutha Gold Trail Charitable Trust	Murray Paterson		Support the removal of 'should follow the statutory review process' from Policy 3.3.4	No specific relief sought	Reject See standard response
General	general comments	476	5	Clutha Gold Trail Charitable Trust	Murray Paterson		Oppose all changes to Policies 3.3.5 - 3.3.8	No specific relief sought	Reject See standard response. The changes to the CMS allow track proposals to be considered, this applies to tracks proposed and funded by others, including Bike Clubs and Trusts etc. It also applies to the bike track developed and managed by the Department. Policy 3.3.5 provides direction to the decision makers for new proposals not listed in the CMS. Policy 3.3.6 provides direction to the decision maker for the assessment of proposals listed in the CMS. Policy 3.3.7 provides direction for the decision maker for the construction and maintenance of bike tracks, including those managed by the Department. Policy 3.3.8 provides direction for any limitations that may be necessary to manage the activity. Policy 3.3.9 provides for the activity to be monitored.
General	general comments	476	6	Clutha Gold Trail Charitable Trust	Murray Paterson		Bike and walking tracks are essentially the same infrastructure and have identical conservation impacts - they should therefore be assessed in the same manner through the existing criteria and process. DOC has focussed on the legalities of bikes being classified as vehicles (GP 9.5(b)) and has blocked them from being considered on p&f&w. Demand for biking is growing, and biking has significant benefits to individuals and communities. The realistic development of cycle trails in Otago over the next 10 years is likely to be less than 10 trails out of 120 submissions. The addition of the statutory review of cycle trails as a pre-qualification step has wasted a significant amount of time and misused resources.	Accept	Accept in part See standard response. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. Walking track and bike tracks and trails have different effects, however many of the same considerations apply to both. We are required to be consistent with the provisions of the CGP 9.5(b) and many bike tracks have already been developed on p&f&w.
General	general comments	476	7	Clutha Gold Trail Charitable Trust	Murray Paterson		Bike and walking tracks are essentially the same infrastructure and have identical conservation impacts - they should therefore be assessed in the same manner through the existing criteria and process. DOC has focussed on the legalities of bikes being classified as vehicles (GP 9.5(b)) and has blocked them from being considered on p&f&w. Demand for biking is growing, and biking has significant benefits to individuals and communities. The realistic development of cycle trails in Otago over the next 10 years is likely to be less than 10 trails out of 120 submissions. The addition of the statutory review of cycle trails as a pre-qualification step has wasted a significant amount of time and misused resources.	Allow bike tracks to be assessed throughout the life of the CMS and not excluded through a statutory prequalification step.	Accept in part See standard response. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. Walking track and bike tracks and trails have different effects, however many of the same considerations apply to both. We are required to be consistent with the provisions of the CGP 9.5(b) and many bike tracks have already been developed on p&f&w.

Specific Policy Requirements	Policy 3.3.4	476	8	Clutha Gold Trail Charitable Trust	Murray Paterson		DOC has proposed to amend Policy 3.3.4 and add policies 3.3.5-3.3.8 despite there being no mandate from the cycling community.	Delete all the added policy detail contained in this section and instead remove the statutory review clause from Policy 3.3.4, and maintain the existing assessment criteria with no addition of policies 3.3.5 onwards. In the alternative, see submission points 476.9 - 476.20.	Reject See standard response. The partial review has added parcels of pcl&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
General	general comments	476	9	Clutha Gold Trail Charitable Trust	Murray Paterson	Top of all Part Two Tables	Linking the addition of cycle trails to a statutory process must stop. Otherwise, we will see the wasteful cost of the Otago Partial CMS Review repeated again and again.	Either insert the following at the beginning of each Table in Part Two: <i>"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."</i> [Noting other submission points seeking amendments to Policy 3.3.4] Or in the alternative: Relocate a list of trails that are not yet approved from construction to an updateable Appendix to the CMS. Add the following to the beginning of the new Appendix: <i>"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."</i> [Noting other submission points seeking amendments to Policy 3.3.4]	Reject See standard response.
General	general comments	476	10	Clutha Gold Trail Charitable Trust	Murray Paterson	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unhelpful use of language. This implies no use of evidence-based assessment, no specialist knowledge. Any person or body could raise a concern. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' has been deleted.
Specific Policy Requirements	Policy 3.3.4	476	11	Clutha Gold Trail Charitable Trust	Murray Paterson	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of possible cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	476	12	Clutha Gold Trail Charitable Trust	Murray Paterson	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering <u>the balance of positive and adverse effects</u> (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be <u>enhanced/avoided, remedied, or mitigated.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	476	13	Clutha Gold Trail Charitable Trust	Murray Paterson		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on pcl&w.	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The partial review has added parcels of pcl&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	476	14	Clutha Gold Trail Charitable Trust	Murray Paterson		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on pcl&w.	If Policy 3.3.5 is to be retained, amend as follows: <i>"May consider the following criteria where appropriate, when assessing whether to develop or allow a new cycle trail."</i>	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered cycle trail proposals. Discretion applies to those criteria that start with 'if required'.
Specific Policy Requirements	Policy 3.3.5	476	15	Clutha Gold Trail Charitable Trust	Murray Paterson	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on pcl&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on pcl&w (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of pcl&w	Reject in part Policy 3.3.5 (now 3.3.6) b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.' If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is pcl&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Rūnanga o Ngāi Tahu is required as part of the proposal and it only covers the pcl&w.
Specific Policy Requirements	Policy 3.3.5	476	16	Clutha Gold Trail Charitable Trust	Murray Paterson	Criterion (i)	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 demand that funding to be secured in the initial planning stage is unrealistic. Maintenance funding is often an ongoing activity. This clause is open to subjective misuse and is unrealistic as currently written.	If Policy 3.3.5 is to be retained, amend as follows: (i) <i>if the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated.</i>	Accept The 'ability to generate' has been added to the policy.

Specific Policy Requirements	Policy 3.3.5	476	17	Clutha Gold Trail Charitable Trust	Murray Paterson	Additional criterion	There is a lack of balance (in the criteria) when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are entirely absent from the assessment criteria.	If Policy 3.3.5 is to be retained, add a new criterion: <i>/// The positive effects on the purpose and outcomes for the place.</i>	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	476	18	Clutha Gold Trail Charitable Trust	Murray Paterson	Criterion (b)	Concerns raised' is such a broad and unspecific use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: 'b) implementing mechanisms to manage the adverse effects as a result of , including compliance with the latest version of the Department's cycle trail <u>standards or commonly accepted national trail design guides.</u>	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
General	general comments	476	19	Clutha Gold Trail Charitable Trust	Murray Paterson	Use of section 53(2) of the Conservation Act	Walking tracks, roads and car parks can be added under Policy 3.2.3 as an 'authorised utility'. This gives DOC a large degree of flexibility to develop all sorts of infrastructure not specifically identified in the CMS. For example, a carpark and road are being developed at Bennett's Bluff, Glenorchy Road, even though the location is not identified in the CMS 2016 for vehicle use. DOC can call a road for vehicle use a 'utility' and then use the Director General's powers under s 53(2)(i) of the Conservation Act to authorise it, despite the intent and spirit of the CMS specifies where vehicles can go on p&l&w. DOC could use this mechanism to authorise bike tracks - bikes being the vehicles and the trails being built and maintained using motorised vehicles. Roads (and cycle trails) being utilities that provide access on conservation land, which is consistent with the definition of utility in the CMS glossary.	DOC to 'authorise' currently funded cycle trails as a 'utility' under Policy 3.2.3 and use the Director General's powers under s53(2)(i) of the Conservation Act.	Reject See standard response.
General	general comments	505	1		Paul Rea	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&l&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&l&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	505	2		Paul Rea		Oppose amendments to Policy 3.3.4. Policy as worded sets a high bar for any cycle tracks; much higher than that for walking tracks or an 'authorised utility'. The amendments have not been sought by the cycling community, nor are they justified by a failure of the current policy or any change to the Conservation General Policy. No evidence that the current policy is not fit for purpose. Proposed wording is inconsistent with other CMS.	No relief specified, but presumably to retain current wording of this policy in the CMS.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	505	3		Paul Rea		Support removal of 'should follow the statutory review process' from Policy 3.3.4. This clause is unnecessary and not justified in terms of the Conservation General Policy. Legal opinions obtained by the cycling community (and provided to the Director General and the Minister) clearly demonstrate that the reason for the current CMS review is because of this clause. It is wasting valuable time and resources on both sides.	No relief specified, but presumably to ensure this phrase/requirement is not in the CMS	Reject See standard response.
General	general comments	505	4		Paul Rea	Use of section 53(2) of the Conservation Act	DOC has recently given approval for the construction of a road and carpark at Bennett's Bluff on the Glenorchy road using powers under CMS Policy 3.2.3 as an 'authorised utility'; and section 53(2)(i) of the Conservation Act.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction using this approach.	Reject See standard response.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	514	1		Tim Dennis	Maungatika Trail	Strongly support the Maungatika Trail. Extensive information is included in the submission with background about the trail.	Provide for this trail in the CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	514	2		Tim Dennis	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&l&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&l&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	514	3		Tim Dennis		Oppose all amendments to Policy 3.3.4		Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	514	4		Tim Dennis	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	514	5		Tim Dennis	Limitations	Oppose all the restrictions in the Tables in Part 2 as they are inconsistent with CGP Clause 9.5(b).	no specific relief sought.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Kārikari a Rākahautō Place	514	6		Tim Dennis		Oppose the exclusion of cycling from these parcels in the Western Lakes and Mountains Place	Provide for cycling on these parcels in the CMS	Accept in part After careful consideration, most proposed areas of p&l&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.7 Eastern Otago and Lowlands / Maukaatua Place	514	7		Tim Dennis		Oppose the exclusion of cycling from these parcels in the Eastern Otago and Lowlands Place	Provide for cycling on these parcels in the CMS	Accept in part After careful consideration, most proposed areas of p&l&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.8 Catlins/Te Ākau Tai Toka Place	514	8		Tim Dennis		Oppose the exclusion of cycling from these parcels in the Catlins Place	Provide for cycling on these parcels in the CMS	Accept in part After careful consideration, most proposed areas of p&l&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.

General	general comments	514	9		Tim Dennis	Marginal strips	Oppose the identification of individual parcels/parts of marginal strips in the Tables in Part 2.	All marginal strips should be added to the tables in Part 2	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain sections of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	514	10		Tim Dennis	Use of section 53(2)(j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
General	general comments	514	11		Tim Dennis		Limiting the addition of potential cycle trail locations to a statutory process must stop. A more broad based identification system gets around the need to detail every trail down to the exact parcels. There is nothing stopping DOC making this change.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Amendment	Reject See standard response. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	514	12		Tim Dennis	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unspecific use of language. This implies no use of evidence-based assessment, no specialist knowledge. Any person or body could raise a concern. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making. This sort of language is inconsistent.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' has been deleted.
Specific Policy Requirements	Policy 3.3.4	514	13		Tim Dennis	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of <u>possible</u> cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	514	14		Tim Dennis	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering <u>the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	514	15		Tim Dennis		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on p&f&w.	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The partial review has added parcels of p&f&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	514	16		Tim Dennis		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: " <u>May consider the following criteria where appropriate, when assessing, whether to develop or allow a new cycle trail...</u> "	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorities. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considering cycle trail proposals. Discretion applies to those criteria that start with 'if...required'.
Specific Policy Requirements	Policy 3.3.5	514	17		Tim Dennis	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on p&f&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on p&f&w (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of p&f&w	Reject in part Policy 3.3.5 (now 3.3.6) b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.' If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is p&f&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Rūnanga o Ngāi Tahu is required as part of the proposal and it only covers the p&f&w.
Specific Policy Requirements	Policy 3.3.5	514	18		Tim Dennis	Criterion (i)	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.	Amend Policy 3.3.5(i) as follows: " <u>If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated.</u> "	Accept The 'ability to generate' has been added to the policy.
Specific Policy Requirements	Policy 3.3.5	514	19		Tim Dennis	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " <u>(j) The positive effects on the purpose and outcomes for the place.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	514	20		Tim Dennis	Criterion (b)	'Concerns raised' is such a broad and unspecific use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: "b) implementing mechanisms to manage the adverse effects of concerns-raised , including compliance with the latest version of the Department's cycle trail <u>standards or commonly accepted national trail design guides.</u>	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.

General	general comments	514	21		Tim Dennis	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unspecific use of language. This should be deleted from all parts of Policy 3.3, as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' has been deleted.
General	general comments	514	22		Tim Dennis	Limitations	Adding the words 'excluding' and 'must avoid' in the Tables in Part 2 is inconsistent with the CGP and oversteps the purpose of the Tables, which is to state where cycling <u>may</u> be allowed. The words 'may establish conditions of use' does not refer to restrictions or exclusions.	All proposed 'exclusions' and 'must avoids' should be deleted.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	514	23		Tim Dennis	Conservation Area - Greenstone	Understand that QTT has received cautious support for a trail from Aukaha and rūnanga for public access to the marginal strip between the Greenstone Stock Bridge and Black Gorge, Elin Bay, Lake Wakatipu/Whakātipu-wai-Māori, subject to more detailed information. DOC mapping for Otago does not identify this parcel of marginal strip, the Trust has researched the certificate of title which is subject to Part IVA of the Conservation Act (see submission for further extensive details on this matter).	Include this parcel in Table 2.3 of the CMS	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	514	24		Tim Dennis	CR - Leaseback - Ngāi Tahu Lease back Area (2892717)	Understand that QTT has engaged with rūnanga to consider this route as far as the Pass Burn Saddle. For most of its length, the proposed alignment follows an unformed legal road. The existing track is suitable for shared use as far as Pass Burn. The track is suitable for a seasonal period for shared use on this trail, which has proved successful on the Heaphy Track. The Greenstone-Mavora walkway between the Pass Burn and Mavora Lakes is a wide-open valley with long sightlines, zero conflict and limited use. The existence of an unformed legal road overlaying and adjacent to the existing track supports cycling on this route. Sharing the trail where it deviates from the unformed legal road is likely to result in far better conservation outcomes than forcing the development of a new parallel trail.	Include this parcel in Table 2.3 of the CMS	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	514	25		Tim Dennis	Conservation Area - Mavora Lakes (Manawapōpōre/Hikuraki)	The Southland Murihiku CMS contradicts DOC's position on this trail, where table 2.2 on page 75 suggests mountain biking is permitted from the North Mavora Swing Bridge to the Kiwi Burn Swing Bridge	Seek that cycling on the Mavora Walkway from the bridge downstream is supported, which would allow a connection to the Kiwi Burn Track for a proposed route to Te Anau.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	514	25		Tim Dennis	North Motatapu Conservation Area	The establishment of the backcountry ski-touring route and hut network from Treble Cone to Coronet Peak via a series of "tunk" huts provides the perfect opportunity to develop a new recreational opportunity along the same alignment. It would complement the existing ski touring and alpine skiing activities at the back of a commercial ski area and would enable more people to enjoy a backcountry experience.	Include this parcel in the CMS	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
General	general comments	515	1		Wendy Johnston	Use of section 53(2j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
General	general comments	515	2		Wendy Johnston	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	523	1		Delvina Gorton		The definition of 'conservation' in the Conservation Act includes reference to providing for recreational enjoyment. Mountain biking and walking are the two main ways that the public uses conservation land for 'recreational enjoyment'. DOC should enable access for mountain biking in appropriate areas, and not block it from being considered by not listing it in the CMS. Cycle tracks should be considered in a similar way to walking tracks. Evidence suggests that levels of track damage are similar between walking and biking, and the success of cycling trails has demonstrated biking's significant social and economic benefits.	Support inclusion of all bike tracks listed in the tables in Section 2 of the CMS. Seek retention of all bike tracks deleted from the CMS.	Accept in part After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.1	523	2		Delvina Gorton		The CMS should identify conservation areas that are suitable for bike tracks and list these, rather than the individual bike tracks. This means that the best tracks and routes in an area can be fully considered and assessed, rather than limiting them to pre-defined tracks.	Amend Policy 3.3.1 as follows: "Should allow independent mountain biking... only on the public conservation land areas. Tracks and roads on other areas identified in..."	Accept in part The CMS only covers pcl&w. Policy 3.3.1 is changed to read 'Should: i) allow independent biking, and ii) grant concessions for guided biking, only on the tracks and roads purposely formed and maintained for biking use within the areas identified in: a) Tables in Part Two – Places; or b) Mount Aspiring National Park Management Plan'
Specific Policy Requirements	Policy 3.3.4	523	3		Delvina Gorton		This policy sets a far higher standard for a cycle track than an equivalent walking track. It creates significant burden and delays and is not justified under the Conservation General Policy which underpins the CMS.	Amend Policy 3.3.4 as follows: "Should follow the statutory amended or review process. When considering further opportunities for mountain bike use on public conservation lands and waters during the term of this CMS, undertake consultation with cycling clubs, adjoining landowners, tramping clubs, other interested parties and the public, and apply the following criteria for the activity: ..."	Reject See standard response

General	general comments	524	1		Kathy Taylor	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	524	2		Kathy Taylor		This policy sets a far higher standard for a cycle track than an equivalent walking track. It creates significant burden and delays and is not justified under the Conservation General Policy which underpins the CMS.	Retain current wording of policy, noting support for the deletion of reference to requirement for statutory review process (524.3)	Reject in part See standard response.
Specific Policy Requirements	Policy 3.3.4	524	3		Kathy Taylor		Support removal of 'should follow the statutory review process...' from Policy 3.3.4. This clause was added to the current CMS in 2015-16 and is both unnecessary and unjustified in terms of the CGP. Legal opinions obtained by the cycling community (and supplied to the Director General of Conservation and the Minister of Conservation) clearly demonstrate that the reason for the current CMS review is because of this clause. It's wasting valuable time and resources on all sides.	Support removal of 'should follow the statutory review process' from policy 3.3.4.	Reject See standard response.
General	general comments	524	4		Kathy Taylor	Use of section 53(2) of the Conservation Act	DOC has recently given approval for the construction of a road and carpark at Bennett's Bluff on the Glenorchy road using powers under CMS Policy 3.2.3 as an 'authorised utility'; and section 53(2)(i) of the Conservation Act.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction using this approach.	Reject See standard response.
General	general comments	525	1	Landscape Wanaka	Rik Deaton		Submission is made in support of general submission prepared by local cycling groups. Submission addresses: - aspirations of submitter to offer more visitor experiences at their property in Wanaka; - the role of e-bikes in the decarbonisation of regional sightseeing and in-town transport for visitors; - the importance of supporting and facilitating a second regional transportation network (based around cycling); - seismic resilience opportunities from a cycle based transport network (particularly around bridges); - that tourism may increasingly have to recompense for a disrupted agricultural sector; - the range of positive effects that can be achieved by supporting cycling tracks and trails in Otago	No specific relief sought in relation to the draft CMS. Seeking that DOC support and enable cycling.	Accept in part See standard response.
General	general comments	551	1		Richard Y Tapper	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping. Policy 3.3 covers the approval process. Cycle tracks have a similar environmental footprint to walking tracks and should be considered acceptable subject to the tests in Policy 3.3.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	551	2		Richard Y Tapper		Oppose all amendments to Policy 3.3.4. The amendments will place unreasonable standards on cycle trails that are much higher than those imposed on new walking tracks under Policy 3.2.3. There appears to be no justification for this based on past experience with existing dual cycle/walking tracks during their construction and subsequent maintenance.	No specific relief sought, however inferred that submitter seeks that Policy 3.3.4 is not amended as proposed in the draft CMS.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	551	3		Richard Y Tapper		Support the removal of 'should follow the statutory review process' from Policy 3.3.4. The statutory review process is a waste of time and effort by all parties.	No specific relief sought, however inferred that submitter seeks the removal of any requirement to follow a statutory review process from the policy.	Reject See standard response.
General	general comments	551	4		Richard Y Tapper	Use of section 53(2) of the Conservation Act	DOC policy appears to be inconsistent. As an example, they constructed a road and carpark at Bennett's Bluff on the Glenorchy Road without public scrutiny and consultation under Section 53(2)(i) of the Conservation Act	On this basis DOC should approve national cycle trails already fully funded and awaiting construction.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.1	556	2		Kevin Jennings	reference to 'other areas' in Policy 3.3.1	Seeks clarification as to what the definition of 'other areas' is. There are multiple 'other areas' that are clearly identified in the tables in Part Two, this should allow for consideration of new trails within that specific area listed. Contend that a reserve or parcel fits under the definition of an 'other area'. Further reinforces that there is no need to list individual tracks in Tables in Part 2 of the CMS.	No specific relief sought, but presumably the submitter seeks that this term is defined, or other such consequential amendments to address submitter's concern.	Accept 'Other areas' has been removed and replaced with other areas of public conservation land and waters.
General	general comments	556	3		Kevin Jennings	Reference to 'limited by topography and vegetation'	Submitter sought clarification of this term in material provided to DOC during May 2020 engagement.	No specific relief sought, but inferred that submitter seeks that a definition for this term is included in the CMS.	Accept in part This term causes confusion on where biking can occur. It has been removed from the CMS.
General	general comments	556	4		Kevin Jennings	2015/16 CMS review process	Various concerns raised with the way in which Policies 3.3.5 and 3.3.6 evolved through this process	Requests that DOC provide clarification and background on this key change to the draft plan (during the previous CMS review). Provide supporting information that is available to demonstrate the need to make the change. Clarify why this change was not identified in Item 14 Main Revisions to Draft. What is the view of Conservation Boards and NZCA as to whether due process was followed and whether they understood the potential repercussions of the change.	Reject See standard response.
Places	Policy 2.2.6	556	5		Kevin Jennings	Reference to 'only as identified in Table 2.2'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.2.6 to remove 'only as identified in Table 2.2'	Reject See standard response.
Places	Policy 2.2.6	556	6		Kevin Jennings		This policy is complicated and circular in its references and could be simplified.	Amend Policy 2.2.6 as follows: "Should allow motorised vehicle, mountain bike and electric power-assisted pedal cycle use only as identified in Table 2.2, and Policies 3.2.3-3.2.6 and 3.3.1-3.3.4 as specified in Part Three. "	Reject Policy 2.2.6 details where motorised and non-motorised bikes are allowed to go, and provides direction for the other policies that need to be taken into consideration. This Policy provides the guidance for the decision makers to ensure everything has been considered.
Places	Table 2.2: Access to Te Papanui, Otaoke and Hāwea Conservation Parks Place	556	7		Kevin Jennings		Support addition of all new areas to Table 2.2.	Retain all additional areas in Table 2.2	Accept After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	556	8		Kevin Jennings	Use of limitations on parcel entries	The addition of exclusions, exceptions, limitations or other restrictive wording is contrary to the purpose of Table 2 and the review and are not appropriate in a table identifying areas where trails may be considered.	Delete any occurrence of 'limited to'; 'excluding'; 'avoid'; 'only' etc. from the Tables in Section 2.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	556	9		Kevin Jennings	Maungatika Trail	This appears to be prejudiced against the Maungatika Trail. The merits of the decision should be decided during the next phase, in DOC's words the second step is the consideration of the proposed cycle trail and assessment of effects and consultation.	Include all areas that the Maungatika traverses.	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	556	10		Kevin Jennings		[Use of a discussion box/approach] is beyond DOC's stated purpose of this CMS review; it appears as if [DOC] is trying to use this process to double as public consultation specific to this trail? DOC has stated that the second step (after review of the draft CMS) is where consultation will take place.	Include all areas that the Maungatika traverses.	Reject in part Discussion boxes are often used in statutory review to gauge the view of the public on use of public conservation land and waters. Hāwea Conservation Park has been retained and the limitation removed so the feasibility of the tracks can be undertaken, subject to the Policies in 3.3.
General	general comments	556	11		Kevin Jennings	Listing individual tracks vs parcels	Is it necessary to list individual tracks or just the areas they could go in? Either way a consistent approach would be beneficial.	If DOC wants to catalogue trails, suggest keeping a separate database of individual trails, leave the CMS to identify where they could go.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	556	12		Kevin Jennings	Marginal strips	Do not support the listing of individual marginal strips in the Tables in Part 2. The purpose of marginal strips in section 24C of the Conservation Act includes reference to enabling public access, and public recreational use of marginal strips. Only including certain marginal strips (or parts of marginal strips) in the Tables means that DOC will not comply with the purpose of marginal strips set out in the Conservation Act. Relying on this level of detail fails to recognise that DOCs mapping often fails to list marginal strips and does not allow for marginal strips handed over via tenure review etc.	Amend the Tables in Part 2 to include any marginal strip administered by DOC with no exceptions [limitations] [and without listing individual marginal strips].	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	556	13		Kevin Jennings	Marginal strips - limitations	Do not support the use of limitations in relation to marginal strips. This fails to comply with section 24C of the Conservation Act. What conservation values, consultation or otherwise would create the need to specify areas of marginal strips that are off limits? Use of limitations could result in DOC refusing to consider a trail that would otherwise be considered.	Amend the tables in Part 2 to remove any references to limitations or exclusions on marginal strips.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	556	14		Kevin Jennings	Hāwea Conservation Park	Hāwea Conservation Park 'and adjacent public conservation lands and waters' is included in the current CMS (with no limitations). Given that the Hāwea Conservation Area is directly adjacent to the Hāwea Conservation Park there is no doubt it should qualify as 'adjacent pcd&w' and was considered as such during the establishment of the operative CMS. This discussion box is redundant as the Hāwea Conservation Park and Hāwea Conservation Area are included as part of the public submissions etc. that informed the original 2016 CMS therefore there should be no need for discussion on this. If the issue is around DOC wanting to restrict access to the Hāwea Conservation Area from what is currently listed in the operative CMS, a more clearly stated approach would enable educated submission.	More transparency in what DOC is trying to achieve with the addition of 'limited to'	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	556	15		Kevin Jennings	Hāwea Conservation Park	Inclusion of the Hāwea Conservation Park in this discussion box is misleading. In the proposed draft [CMS] DOC has amended the operative 2016 CMS and introduced 'limited to'. To encourage informed discussion DOC could have clarified that Table 2.2 in the current plan specifically lists 'Hāwea Conservation Park and adjacent public conservation lands and waters'. There are no limitations listed and that they have introduced a clause that has extreme consequences beyond the Kidds Bush Loop trail and Maungatika Trail.	Oppose the inclusion of 'limited to' in respect of Hāwea Conservation Park. Seek a different approach of presenting the operative CMS vs inclusions that DOC has added to the Draft CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	556	16		Kevin Jennings		Reference to "leaving the north-western areas... for users that appreciate the remoteness and natural quiet." is a peculiar reference. There appears to be a philosophical assumption here that Mountain Bikers would not fit into the category of 'users that appreciate the remoteness and natural quiet.'	Clarify whether DOC views Mountain Bikers as a user group that appreciates remoteness and natural quiet.	Reject in part The reference in the 'Discussion Box' is taken from the CMS Outcome statement for Hāwea and applies to all users not just bikers. This is the area along the main divide of the Southern Alps/Ka Tiritiri. The outcome statements are not under review and have not changed.
Places	Policy 2.3.2	556	17		Kevin Jennings	Reference to 'only as identified in Table 2.3'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.3.2 to remove 'only as identified in Table 2.3'	Reject See standard response.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	18		Kevin Jennings		Support all additions to Table 2.3	Support addition of all areas to Table 2.3	Accept in part After careful consideration, most proposed areas of pcd&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	19		Kevin Jennings	Conservation Area - Kinloch Scenic Reserve	There is a limitation against this parcel - "limited to Kinloch Road only". Query whether DOC administers the road. Oppose use of the limitation.	Remove the limitation from this parcel. Clarify id DOC has authority over activities on the road.	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	20		Kevin Jennings	Arrowtown Chinese Settlement (pt)	What is (pt)?	Please clarify definition of (pt)	Accept 'pt' is in the name of the Historic Reserve - meaning part of. There are two parts to this reserve both with the same name.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	21		Kevin Jennings	Conservation Area - Kinloch Foreshore	There is a limitation against this parcel - "limited to Kinloch Road only". Query whether DOC administers the road. Oppose use of the limitation.	Remove the limitation from this parcel. Clarify id DOC has authority over activities on the road.	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Table 2.3: Access to Western Lakes and Mountains Place	556	22	Kevin Jennings	Conservation Area - Mt Creighton	There is a limitation against this parcel - "Proposed tracks subject to future management plan (or other appropriate document) addressing recreation opportunities on this parcel." How is this relevant as to whether or not it should be included in Table 2.3? This is an unnecessary and vague addition. Future management plans will be able to address this if and when they are created.	Retain Conservation Area - Mt Creighton in Table 2.3 but delete the limitation.	Accept in part Conservation Area Mt Creighton has been included in the CMS and the limitation retained so further investigation can be made into the recreational opportunities for this p&w. However, it has been reworded to read: 'Conservation Area - Mt Creighton - subject to recreational opportunities feasibility study outcomes.'
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	23	Kevin Jennings	Conservation Area - Rees River	There is a limitation against this parcel - "Must avoid braided river ecosystem" The current CMS includes the Rees River Marginal Strip, in places this is part of the braided river ecosystem. The inclusion of this limitation is confusing and overly prescriptive for the purpose of Table 2.3. This should be addressed when applicants are applying for specific trails.	Retain Conservation Area - Rees River in Table 2.3 but delete the limitation.	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	24	Kevin Jennings	Conservation Area - Tuckers Beach	There is a limitation against this parcel - "excluding threatened braided river ecosystem" The inclusion of this limitation is confusing and overly prescriptive for the purpose of Table 2.3. what is the definition of 'threatened'? This should be addressed when applicants are applying for specific trails.	Retain Conservation Area - Tuckers Beach in Table 2.3 but delete the limitation. Identify the parts of the braided river that are 'threatened'.	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	25	Kevin Jennings	Devils Creek Conservation Area	There is a limitation against this parcel - "excluding remnant beech forest". Why has this new exclusion been introduced? What is the definition of remnant and what measurements or analysis are used to determine this? Is the same restriction going to be put on all other users/projects on p&l&w such as walking tracks? Does DOC intend to ban any future trails in Beech Forests? This will have monumental impact on the future of trail building in NZ. Overly prescriptive for Table 2.3	Retain Devils Creek Conservation Area in Table 2.3 but delete the limitation.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	26	Kevin Jennings	Greenstone Road Recreation Reserve	There is a limitation against this parcel - "excluding the Cherry Gardens (Sawmill Settlement) as defined by Heritage New Zealand Pouhere Taonga". The Cherry Gardens Sawmill settlement is underused, overgrown and falling into disrepair. Archaeological recommendations to QLDC from Heritage New Zealand noted that a historic pack track exists from Kinloch to the site and continues on to the Greenstone River. I support encouraging more people to become aware of and possibly visit this area. Mountain Bikes create access to Conservation. Perhaps local cycle enthusiasts could work with Local historical societies and Heritage New Zealand Pouhere Tonga to create access to this area with a cycle track.	Delete the limitation from this parcel. Encourage DOC to facilitate like minded user groups to embark on community conservation projects. Request justification for this exclusion.	Reject in part The Greenstone Road Recreation Reserve has been included in the CMS but the limitation has been retained to protect this heritage site. However, this does not stop groups getting involved in conservation projects.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	27	Kevin Jennings	Mt Crichton Scenic Reserve	There is a limitation against this parcel - "must avoid ridgelines and beech forest damage". Why is it necessary to avoid the ridgeline? Often the most scenic and safe passage is along the ridgeline. Will these criteria also apply to new hiking trails? Why is necessary to avoid beech forest damage? Beech forests contain some of the best potential for trails in NZ. How will DOC staff address this when considering a trail application? What is the definition of damage? Will this apply to any other work or projects on the DOC estate?	Retain Mt Crichton Scenic Reserve in Table 2.3, but delete limitation.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. Mt Crichton Scenic Reserve is excluding Mt Crichton Loop Track.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	28	Kevin Jennings	Lake Rere Recreation Reserve	There is a limitation against this parcel - to stock bridge access only and not on Rere Lake Walk. These limitations are not necessary for the purpose of this CMS review.	Delete limitations from Lake Rere Recreation Reserve	Accept in part Lake Rere Recreation Reserve limitation has been revised to read 'subject to minimum impact and limited access to the Rere Lake Walk'.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	29	Kevin Jennings	Lake Wakatipu (Whakatipu-wai-māori) Marginal Strip (2800830)	There is a limitation against this parcel - limiting access to the part of the marginal strip between the point where Walter Peak Road meets Beach Bay and eastwards along Beach Bay. What values to the other parts of this marginal strip necessitated its exclusion?	Delete limitation from Lake Wakatipu (Whakatipu-wai-māori) Marginal Strip or provide justification for the exclusion.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	30	Kevin Jennings	McChesney's Conservation Area	There is a limitation against this parcel - to 'several tracks (proposed tracks)'. Seems vague and unnecessary to qualify in this way.	Retain McChesney's Conservation Area in Table 2.3, but delete limitation.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	31	Kevin Jennings	Rastus Burn Recreation Reserve	There is a limitation against this parcel - to 'Remarkables Downhill Track (existing); and proposed tracks (must avoid ridgelines and prominent landscape features)'. The limitation relating to avoiding ridgelines does not make sense. Seek clarity as to why the reference to avoiding prominent landscape features has been included - what is the definition of 'avoid'? Rude Rock Trail is one of the region's shining assets, it is named after, raises awareness of, and encourages people to appreciate this prominent landscape feature. When is a landscape feature prominent? For instance, the Remarkables Downhill Track arguably bits on our most public and prominent landscape feature - The Remarkables. How would this limitation be administered?	Remove limitations from Rastus Burn Recreation Reserve	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	556	32	Kevin Jennings	Remarkables Conservation Area	There are various limitations against this parcel, including inconsistent references to the need to avoid/be limited to ridgelines. These inconsistencies reinforce the need to keep Table 2.3 free of limitations which can be efficiently addressed in the trail application phase.	Remove limitations from Remarkables Conservation Area.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Table 2.3: Access to Western Lakes and Mountains Place	556	33	Kevin Jennings	Remarkables Conservation Area	There is a limitation on this parcel referring to 'existing easements where mountain biking is allowed'. Why is this here? Who manages these easements?	Remove this limitation from Remarkables Conservation Area or amend wording to "including any easements..."	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Policy 2.4.5	556	34	Kevin Jennings	Reference to 'only as identified in Table 2.4'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.4.5 to remove 'only as identified in Table 2.4'	Reject See standard response
Places	Policy 2.5.6	556	35	Kevin Jennings	Reference to 'only as identified in Table 2.5'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.5.6 to remove 'only as identified in Table 2.5'	Reject See standard response
Places	Policy 2.6.10	556	36	Kevin Jennings	Reference to 'only as identified in Table 2.6'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.6.10 to remove 'only as identified in Table 2.6'	Reject See standard response
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	556	37	Kevin Jennings	Mahaka Katia Scientific Reserve	A more appropriate question would be to ask if mountain biking and e-biking should be allowed in Table 2.6 to allow DOC and the applicant to properly consider the project. Support including this parcel in Table 2.6. This will allow DOC to properly consider the trail and determine any significant effects and whether they can be avoided or mitigated; and undertake public notification if necessary. Submitters to this review do not have enough information or the opportunity to assess positive aspects of the project to decide whether it should or should not be allowed. It is also beyond the remit of the current review.	Include Mahaka Katia Scientific Reserve in Table 2.6.	Reject Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Places	Policy 2.7.13	556	38	Kevin Jennings	Reference to 'only as identified in Table 2.7'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.7.13 to remove 'only as identified in Table 2.7'	Reject See standard response
Places	Policy 2.8.7	556	39	Kevin Jennings	Reference to 'only as identified in Table 2.8'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.8.7 to remove 'only as identified in Table 2.8'	Reject See standard response
Specific Policy Requirements	3.3. MTB-intro text	556	40	Kevin Jennings	E-bikes	Support the approach to managing e-bikes and mountain bikes together.	Support the addition of e-bikes to section 3.3.	Accept
Specific Policy Requirements	3.3. MTB-intro text	556	41	Kevin Jennings	Terminology	Seems to be a lack of consistency when describing mountain biking and e-mountain bikers; mountain bike tracks and cycling tracks. In terms of downhill, there is relatively little difference between the two.	Suggest using the term 'mountain bikers' and 'mountain bike tracks' or 'bike tracks' throughout.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes, which includes e-bikes and definitions have been added to the Glossary.
Specific Policy Requirements	3.3. MTB-intro text	556	42	Kevin Jennings	Downhill	Reference is made to a need for more caution when considering downhill cyclists.	Replace with 'Should consider this and ways to mitigate risk, such as one-way trails, or signage'.	Accept in part On pcl&w caution is required when considering high speed and high impact activity. Consideration of the style of biking proposed on pcl&w has been added as a consideration under the 3.3 Policies and Policy 3.3.10 has been deleted.
Specific Policy Requirements	Policy 3.3.1	556	43	Kevin Jennings	Terminology	Support the addition of e-biking into the same policies as mountain biking. For greater simplicity perhaps a definition of mountain biking that includes e-bikes (cycling) could occur in 3.3 and negate the repetitive nature of most of the policies.	Suggest providing a definition of mountain biking as including e-bikes and amending policies accordingly.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes, which includes e-bikes and definitions have been added to the Glossary.
Specific Policy Requirements	Policy 3.3.4	556	44	Kevin Jennings		Support deletion of the reference to needing to follow the statutory amendment or review process.	Delete Policy 3.3.4 and roll back to previous policies 3.3.5 and 3.3.6 (deleting requirement to follow statutory amendment or review process).	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	556	45	Kevin Jennings		Oppose insertion of 'not identified in Policy 3.3.1' and of clause a) requiring a statutory amendment or review process to be followed.	Delete Policy 3.3.4	Reject See standard response.
Specific Policy Requirements	Policy 3.3.5	556	46	Kevin Jennings		This policy (as well as Policy 3.3.4 and 3.3.6) is overly onerous, restrictive and in many places redundant. It introduces three processes and significant layers of bureaucracy when one robust process would do.	Revert to the policies in the original Draft CMS as part of the 2016 review. Work with stakeholders to rework this [policy] into a functional management set of policies.	Reject See standard response. The partial review has added parcels of pcl&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.4	556	47	Kevin Jennings		This [policy] allows DOC to consider if they will accept an application. There is no need for any of the [amendments to this policy] except for the deletion of the requirement to follow the statutory amendment or review process in two places.	Accept deletion and reject insertion of 'follow the statutory amendment or review process'.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.5	556	48	Kevin Jennings	Criterion (a)	This is how DOC will assess a [track] proposal, but is not what is considered to grant authorisation to construct and maintain it. There appears to be no consideration as to the positive effects of the application. This should be added to the assessment criteria.	Amend Policy 3.3.5(a) to include "The positive conservation and recreation outcomes achieved as a part of this project" (or similar)	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	556	49	Kevin Jennings	Criterion (b)	This criterion is an arbitrary way to say no [to a track proposal]. How will an assessment of the long-term effects of climate change be performed, what triggers would affect an either positive or negative decision on an application?	Delete Policy 3.3.5(b).	Reject The long-term effects of climate change, including flooding and coastal erosion need to be a consideration of any proposal to determine if they are relevant. Policy 3.3.5 (now 3.3.6) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.'
Specific Policy Requirements	Policy 3.3.5	556	50	Kevin Jennings	Criterion (f)		Applicants should be able to take part in this consultation and/or present to conservation boards at a regularly scheduled meeting.	Accept in part The public are able to consult with the Conservation Board who regularly have open public sessions or you can request to speak with the Board.
Specific Policy Requirements	Policy 3.3.5	556	51	Kevin Jennings	Criterion (g)	Suggest that a new way of approaching this where applicants and DOC staff engage in this consultation together as opposed to the current procedures.	Support active cooperation between applicants and DOC regarding consultation.	Reject in part This is not a consideration that needs to be addressed in the CMS.
Specific Policy Requirements	Policy 3.3.5	556	52	Kevin Jennings	Criterion (h)	How will level of demand be determined, and by whom? Is this a standard condition for DOC or is it specific to Mountain Bike trails? This could be subjective and difficult to assess. If an applicant has come to DOC for approval, it is likely that they are confident of demand to a point where they are initiating and paying for the project.	Delete Policy 3.3.5(h)	Accept in part Policy 3.3.5(h) is required to determine the right opportunity is being provided in the right place. It is also elsewhere in the CMS. In particular Section 1.5.3 Recreation, Objective 1.5.3.1 and would be applied to other developments such as walking tracks and visitor facilities.

Specific Policy Requirements	Policy 3.3.5	556	53		Kevin Jennings	Criterion (f)	This will greatly stifle many community projects. Most projects seek to secure permission ahead of creating a fund-raising campaign.	Delete Policy 3.3.5(f); or Amend to 'Some approvals may be on the condition to demonstrate adequate funds or funding strategies'	Accept in part This Policy has been amended to read: 'if the ability to generate adequate funding ...'
Specific Policy Requirements	Policy 3.3.6	556	54		Kevin Jennings		Policy 3.3.6 outlines considerations mainly covered in Policies 3.3.4 and 3.3.5.	Suggest combining Policies 3.3.4, 3.3.5 and 3.3.6 (and removing redundant policies).	Reject See standard response. The partial review has added parcels of p&l&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.7	556	55		Kevin Jennings			Combine (Policy 3.3.7) with other policies in this section and remove redundant policies	Reject Policy 3.3.7 provides guidance for controls to be included in an authorisation if considered necessary to manage adverse effects. These matters are not addressed elsewhere in the Policies.
Specific Policy Requirements	3.4. Electric power-assisted pedal cycles	556	56		Kevin Jennings		Support deletion of this clause and combining management with Mountain Bikes.	Support deletion of clause 3.4	Accept
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	556	57		Kevin Jennings		I am not aware of any submitters who were consulted on these outcomes. Some of the assumptions require further clarification, such as: - the effects of cycling and how they are calculated; - the methodology that is used to determine 'important tramping values' - whether representatives from the Te Araroa Trail were consulted in reaching this position; - How significant change is assessed; - whether all change is considered negative; - Whether positive effects of significant change were assessed (and provide the assessment); - How DOC determined that cycling is not compatible with a backcountry experience; - Why narrowness of track is suitable for hikers and cattle, but not hikers and bikers; - How DOC equates more people riding bikes to more people walking dogs; - There appears to be an overly negative view on MTB in the Catlins area. Urge DOC to revisit this to see what opportunities could be enabled with a more proactive approach to recreational management.	Summarised submission	Accept in part After careful consideration, most proposed areas of p&l&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 policies. Some areas of p&l&w in Catlins Place remain excluded to protect wildlife values.
Specific Policy Requirements	Policy 3.3.6	556	58		Kevin Jennings		This policy (as well as Policy 3.3.4 and 3.3.5) is overly onerous, restrictive and in many places redundant. It introduces three processes and significant layers of bureaucracy when one robust process would do.	Revert to the policies in the original Draft CMS as part of the 2016 review. Work with stakeholders to rework this [policy] into a functional management set of policies.	Reject See standard response. The partial review has added parcels of p&l&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.6 (now 3.3.7) has been strengthened to provide direction for tracks to be constructed and maintained. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
General	general comments	556	58		Kevin Jennings		Submitter has provided an extensive submission raising a series of points in relation to the following themes: - shift in approach to conservation - Issues in DOC keeping up-to-date with CMS and NPMPs - Concern about reliance on definitions of terms in other statutes (and issues arising) (e.g. vehicle) - Issues with the current restrictive approach to MTB in Otago; - Apparent disconnect between aspirational statements around enabling biking in some parts of the CMS and restrictive approach elsewhere; - Concern about the policy shift in the CMS during the 2016 review; - Whether it is 'correct' that the CMS needs to identify where tracks can go; - Approach to marine limits.	No specific relief that is within the scope of the review not captured elsewhere in the submission. Noted here for context.	Noted See standard response.
General	general comments	562	1		Amber Frew				No content to the submission.
Places	Table 2.3: Access to Western Lakes and Mountains Place	566	1		Kevin Jennings	Whakaari Conservation Area	Whakaari Conservation Area was already listed in Table 2.3 of the CMS, allowing DOC to consider applications for new trails in the future. No need to amend this clause. No mention of the trail that was applied for by the Glenorchy Trails Trust in this parcel. The only amendments made were to introduce a restrictive clause to this area, leaving 5 existing trails with no possibility of expansion. By contrast DOC has an access arrangement with a mining company on the same conservation area (described in Resource Consent RM151033). This illustrates a discrepancy in the way that two very different activities are managed on this parcel.	XX check submission table that follows	Reject Whakaari Conservation Area was listed in the CMS prior to the partial review but was not available for the consideration of new bike tracks as it was limited to existing tracks. This p&l&w has significant conservation values, including the recreation activities already occurring. It is considered the cumulative effects of further tracks would have unacceptable impacts. The limitation of existing tracks only remains. The access arrangement issued for a limited period of time was for a specific number of test drilling sites, with minimal impact.
General	general comments	573	1		Dave McLeod		Neither support nor oppose the plan as it hasn't been targeted effectively. Local MTB club has carte blanché their proposal and not looked at where practicable MTB tracks might be located. MTB and hikers are not that compatible - I am in favour of tracks that are wide enough to accommodate both. Some tracks with require large budgets for construction and maintenance.	There must be a plan of the use of bikes on DOC parcels but further thought on the specific locations of these needs to be narrowed down.	Accept in part The partial review has added parcels of p&l&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
General	general comments	579	1	Cardrona Alpine Resort Limited	Ben Farrell		CARL supports the partial review of the Otago CMS to facilitate motorised vehicle, mountain bike and electric power-assisted pedal cycle access on or through the Otago Conservation estate to provide for greater recreation opportunities in the region.	No relief sought.	Accept in part The partial review has not provided for more motorised vehicle access through p&l&w in Otago. It does however allow for the consideration of bike tracks and the use of non-motorised bikes.
Places	Table 2.3: Access to Western Lakes and Mountains Place	579	2	Cardrona Alpine Resort Limited	Ben Farrell	Motatapu Conservation Area	CARL supports motorised vehicle access on or throughout the Motatapu Conservation Area to enable more year-round activities.	No relief sought.	Accept The partial review has not provided for more motorised vehicle access through p&l&w in Otago. It does however allow for the consideration of bike tracks and the use of non-motorised bikes.

Places	Table 2.3: Access to Western Lakes and Mountains Place	579	3	Cardrona Alpine Resort Limited	Ben Farrell	Treble Cone Access Road Conservation Area	CARL supports motorised vehicle access on or throughout the Treble Cone Access Road Conservation Area to enable more year-round activities.	No relief sought.	Accept The partial review has not provided for more motorised vehicle access through pcli&w in Otago. It does however allow for the consideration of bike tracks and non-motorised bike access.
Places	Table 2.3: Access to Western Lakes and Mountains Place	579	4	Cardrona Alpine Resort Limited	Ben Farrell	North Motatapu Conservation Area	CARL is neutral in respect of retaining or amending Policy 2.3.2 with respect to allowing motorised vehicle access on or throughout the Motatapu North Conservation Area.	No relief sought.	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
General	general comments	897	1		David Howard	Mapping	Support all tracks shown on the DOC interactive mapping.	Provide for these trails in the CMS	Accept After careful consideration, most of the areas of pcli&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcli&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	897	2		David Howard	Kidds Bush Loop Trail	Support the Kidds Bush Loop Trail.	Provide for this trail in the CMS	Accept Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	897	3		David Howard	Maungatika Trail	Support the Maungatika Trail. Extensive information is included in the submission with background about the trail.	Provide for this trail in the CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	897	4		David Howard		Strongly oppose all amendments to Policy 3.3.4.	No specific relief sought - see other submission points	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	897	5		David Howard	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	897	6		David Howard	Limitations	Oppose all the restrictions in the Tables in Part 2 as they are inconsistent with CGP Clause 9.5(b).	no specific relief sought.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	897	7		David Howard		Oppose the exclusion of cycling from these parcels in the Western Lakes and Mountains Place	Provide for cycling on these parcels in the CMS	Accept in part After careful consideration, most proposed areas of pcli&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.7 Eastern Otago and Lowlands / Maukaatua Place	897	8		David Howard		Oppose the exclusion of cycling from these parcels in the Eastern Otago and Lowlands Place	Provide for cycling on these parcels in the CMS	Accept After careful consideration, most proposed areas of pcli&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.8 Catlins/Te Ākau Tai Toka Place	897	9		David Howard		Oppose the exclusion of cycling from these parcels in the Catlins Place	Provide for cycling on these parcels in the CMS	Accept in part After careful consideration, most proposed areas of pcli&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	897	10		David Howard	Marginal Strips	Oppose the identification of individual parcels/parts of marginal strips in the Tables in Part 2.	All marginal strips should be added to the tables in Part 2	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	897	11		David Howard	Use of section 53(2) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(i) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
General	general comments	897	12		David Howard		Limiting the addition of potential cycle trail locations to a statutory process must stop. A more broad based identification system gets around the need to detail every trail down to the exact parcels. There is nothing stopping DOC making this change.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Appendix.	Reject See standard response. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Specific Policy Requirements	3.3. MTB-intro text	897	13		David Howard	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unspecific use of language. This should be deleted from all parts of Policy 3.3, as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' has been removed.

Specific Policy Requirements	Policy 3.3.4	897	14		David Howard	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of <u>possible</u> cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	897	15		David Howard	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering <u>the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	897	16		David Howard		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on p&f&w.	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The criteria in Policy 3.3.5 (now 3.3.6) have been strengthened to allow the proposed bike tracks to be added to the CMS and the consideration and assessment to be undertaken later. If we did not change these policies, the assessments would need to be completed prior to us undertaking the <u>partial review</u> .
Specific Policy Requirements	Policy 3.3.5	897	17		David Howard		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: " <u>May consider the following criteria where appropriate, when assessing, whether to develop or allow a new cycle trail...</u> "	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered cycle trail proposals. Discretion applies to those criteria that start with <u>'If, required'</u> .
Specific Policy Requirements	Policy 3.3.5	897	18		David Howard	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on p&f&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on p&f&w. (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of p&f&w.	Reject in part Policy 3.3.5 (now 3.3.6) b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion'. If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is p&f&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Rūnanga o Ngāi Tahu is required as part of the proposal and it only covers the p&f&w.
Specific Policy Requirements	Policy 3.3.5	897	19		David Howard	Criterion (i)	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 <u>address this concern</u> . DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5(i) as follows: " <u>If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated.</u> "	Accept The 'ability to generate' has been added to the Policy.
Specific Policy Requirements	Policy 3.3.5	897	20		David Howard	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " <u>(i) The positive effects on the purpose and outcomes for the place.</u> "	Accept in part The positive effects of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	897	21		David Howard	Criterion (b)	'Concerns raised' is such a broad and unspecific use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: " <u>b) implementing mechanisms to manage the adverse effects of concerns raised, including compliance with the latest version of the Department's cycle trail standards or commonly accepted national trail design guides.</u> "	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
General	general comments	931	1	Bike Wanaka	Dave Howard	Mapping	Support all tracks shown on the DOC interactive mapping.	Provide for these trails in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	931	2	Bike Wanaka	Dave Howard	Kidds Bush Loop Trail	Support the Kidds Bush Loop Trail.	Provide for this trail in the CMS	Accept Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	931	3	Bike Wanaka	Dave Howard	Maungatika Trail	Support the Maungatika Trail.	Provide for this trail in the CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 policies.
Specific Policy Requirements	Policy 3.3.4	931	4	Bike Wanaka	Dave Howard		Oppose all amendments to Policy 3.3.4.		Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	931	5	Bike Wanaka	Dave Howard	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.

General	general comments	931	6	Bike Wanaka	Dave Howard		Limiting the addition of potential cycle trail locations to a statutory process must stop. A more broad based identification system gets around the need to detail every trail down to the exact parcels. There is nothing stopping DOC making this change.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Appendix	Reject See standard response. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Specific Policy Requirements	3.3. MTB-intro text	931	7	Bike Wanaka	Dave Howard	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unpecific use of language. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' have been deleted.
Specific Policy Requirements	Policy 3.3.4	931	8	Bike Wanaka	Dave Howard	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of possible cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	931	9	Bike Wanaka	Dave Howard	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering the <u>balance of positive and adverse effects</u> (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be <u>enhanced/avoided, remedied, or mitigated.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Polices allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	931	10	Bike Wanaka	Dave Howard		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on p&w	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The criteria in Policy 3.3.5 (now 3.3.6) have been strengthened to allow the proposed bike tracks to be added to the CMS and the consideration and assessment to be undertaken later. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	931	11	Bike Wanaka	Dave Howard		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: " <u>May consider the following criteria where appropriate, when assessing, whether to develop or allow a new cycle trail...</u> "	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered cycle trail proposals. Discretion applies to those criteria that start with 'If...required'.
Specific Policy Requirements	Policy 3.3.5	931	12	Bike Wanaka	Dave Howard	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on p&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on p&w (e) If engagement is required with Rūnaka and Te Rūnanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of p&w	Reject in part Policy 3.3.5 (now 3.3.6) b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion'. If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is p&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Rūnanga o Ngāi Tahu is required as part of the proposal and it only covers the p&w.
Specific Policy Requirements	Policy 3.3.5	931	13	Bike Wanaka	Dave Howard	Criterion (i)	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.	Amend Policy 3.3.5(i) as follows: " <u>If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated.</u> "	Accept The 'ability to generate' has been added to the Policy.
Specific Policy Requirements	Policy 3.3.5	931	14	Bike Wanaka	Dave Howard	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " <u>(i) The positive effects on the purpose and outcomes for the place.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Polices allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	931	15	Bike Wanaka	Dave Howard	Criterion (b)	'Concerns raised' is such a broad and unpecific use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: " <u>Implementing mechanisms to manage the adverse effects of concerns raised, including compliance with the latest version of the Department's cycle trail standards or commonly accepted national trail design guides.</u> "	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
General	general comments	1063	1		Peter King	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1063	2		Peter King	Maungatika Trail	Support the Maungatika Trail. It is a great concept with a similar vision to the recently opened Paparua Great Walk. The track will provide great access to the Hawea Conservation Park for walking and mountain biking, as well as for hunting and ski touring. The track will be fully funded by private partners and DOC will not be asked to pick up the tab to build or maintain it.	No relief specified but presumably to amend CMS to provide for the Maungatika Trail	Accept After careful consideration Hawea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.

Specific Policy Requirements	Policy 3.3.4	1063	3		Peter King		This policy sets a high bar for any cycle track project and is much higher in terms of the environmental tests than for an equivalent walking track or 'authorised utility'. The amendments have not been sought by the cycling community. There is no evidence the current policy is not fit for purpose. The proposed wording is inconsistent with other CMS.	No relief specified but presumably revert to the original policy wording.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1063	4		Peter King		Support removal of 'should follow the statutory review process' from Policy 3.3.4. This clause is unnecessary and not justified in terms of the Conservation General Policy. Legal opinions obtained by the cycling community (and provided to the Director General of Conservation and the Minister of Conservation) demonstrate that the reason for the current CMS review is because of this clause. It is wasting valuable time and resources on all sites.	Amend Policy 3.3.4 to remove reference to any requirement to follow the statutory amendment or review process.	Reject See standard response.
General	general comments	1063	5		Peter King	Use of section 53(2)(j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
General	general comments	1085	1		Roisin Magee		All tracks should be open to all non-motorised transport without limitation because: - non-motorised transport is a low-impact way for everyone to enjoy New Zealand; - non-motorised transport is something to be encouraged as it brings social, health and financial benefits (tourism); - access will be self-limiting as cyclists and horse riders will not use tracks that don't suit them; - no need to place statutory, regulatory or other limits on non-motorised transport; - opportunities and constraints in relation to use of tracks are very similar for all forms of non-motorised transport.	No relief specified.	Reject See standard response.
General	general comments	1417	1		Brian and Jan MacPherson	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	1417	2		Brian and Jan MacPherson		Oppose all amendments to Policy 3.3.4	No relief specified, but presumably delete this policy.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1417	3		Brian and Jan MacPherson		Support removal of 'should follow the statutory review process' from Policy 3.3.4	No relief specified, but presumably remove the requirement to follow this process from the CMS.	Reject See standard response
General	general comments	1417	4		Brian and Jan MacPherson	Use of section 53(2)(j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
General	general comments	1421	1		Mary and John Thompson	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	1421	2		Mary and John Thompson		Oppose all amendments to Policy 3.3.4. The amendments will place unreasonable standards on cycle trails that are much higher than those imposed on new walking tracks under Policy 3.2.3. Amendments have not been sought by the cycling community. There is no evidence the current policy is not fit for purpose. The proposed wording is inconsistent with other CMS.	No relief specified, but presumably delete this policy.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1421	3		Mary and John Thompson		Support removal of 'should follow the statutory review process' from Policy 3.3.4. This clause is unnecessary and is not justified in terms of the CGP. It is the reason for the current CMS review and is wasting valuable time and resources on all sides.	No relief specified, but presumably remove the requirement to follow this process from the CMS.	Reject See standard response
General	general comments	1421	4		Mary and John Thompson	Use of section 53(2)(j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
Places	Policy 2.2.6	1480	1	Southern Eco Trails Trust	Henry van Asch		Oppose current policy. Neither the Conservation Act nor the CGP requires trails to be identified in Table 2.2.	Delete 'only as identified in Table 2.2' from this policy.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. Also see standard response.
Places	Policy 2.2.6	1480	2	Southern Eco Trails Trust	Henry van Asch		The document is overly complicated and circular in its references.	Reword policy as follows: " Should allow motorised vehicle, mountain bike and electric power-assisted pedal cycle use only as identified specified in Table 2.2 and Policies 2.2.1-2.2.12, and 3.3.1-3.3.12 in Part Three. "	Reject Policy 2.2.6 details where motorised and non-motorised bikes are allowed to go, and provides direction for the other policies that need to be taken into consideration. This Policy provides the guidance for the decision makers to ensure everything has been considered.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1480	3	Southern Eco Trails Trust	Henry van Asch		Support all additions to Table 2.2	Support addition of all areas to Table 2.2	Accept in part After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1480	4	Southern Eco Trails Trust	Henry van Asch	Use of limitations on parcel entries	The addition of exclusions, exceptions, limitations or other restrictive wording is contrary to the purpose of Table 2 and the review and are not appropriate in a table identifying areas where trails may be considered.	Delete any occurrence of 'limited to'; 'excluding'; 'avoid'; 'only' etc. from the Tables in Section 2.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1480	5	Southern Eco Trails Trust	Henry van Asch	Maungatika Trail	This appears to be prejudiced against the Maungatika Trail. The merits of the decision should be decided during the next phase, in DOC's words the second step is the consideration of the proposed cycle trail and assessment of effects and consultation.	Include all areas that the Maungatika traverses.	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1480	6	Southern Eco Trails Trust	Henry van Asch		[Use of a discussion box/approach] is beyond DOC's stated purpose of this CMS review; it appears as if [DOC] is trying to use this process to double as public consultation specific to this trail? DOC has stated that the second step (after review of the draft CMS) is where consultation will take place.	Include all areas that the Maungatika traverses.	Reject in part Discussion boxes are often used in statutory review to gauge the view of the public on use of public conservation land and waters. Hāwea Conservation Park has been retained and the limitation removed so the feasibility of the tracks can be undertaken, subject to the Policies in 3.3.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1480	7	Southern Eco Trails Trust	Henry van Asch	Listing individual tracks vs parcels	Is it necessary to list individual tracks or just the areas they could go in? Either way a consistent approach would be beneficial.	If DOC wants to catalogue trails, suggest keeping a separate database of individual trails, leave the CMS to identify where they could go.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	1480	8	Southern Eco Trails Trust	Henry van Asch	Marginal strips	Do not support the listing of individual marginal strips in the Tables in Part 2. The purpose of marginal strips in section 24C of the Conservation Act includes reference to enabling public access, and public recreational use of marginal strips. Only including certain marginal strips (or parts of marginal strips) in the Tables means that DOC will not comply with the purpose of marginal strips set out in the Conservation Act. Relying on this level of detail fails to recognise that DOCs mapping often fails to list marginal strips and does not allow for marginal strips handed over via tenure review etc.	Amend the Tables in Part 2 to include any marginal strip administered by DOC with no exceptions [limitations] [and without listing individual marginal strips].	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1480	9	Southern Eco Trails Trust	Henry van Asch	Marginal strips - limitations	Do not support the use of limitations in relation to marginal strips. This fails to comply with section 24C of the Conservation Act. What conservation values, consultation or otherwise would create the need to specify areas of marginal strips that are off limits? Use of limitations could result in DOC refusing to consider a trail that would otherwise be considered.	Amend the tables in Part 2 to remove any references to limitations or exclusions on marginal strips.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1480	10	Southern Eco Trails Trust	Henry van Asch	Hāwea Conservation Park	Hāwea Conservation Park 'and adjacent public conservation lands and waters' is included in the current CMS (with no limitations). Given that the Hāwea Conservation Area is directly adjacent to the Hāwea Conservation Park there is no doubt it should qualify as 'adjacent pcd&w' and was considered as such during the establishment of the operative CMS. This discussion box is redundant as the Hāwea Conservation Park and Hāwea Conservation Area are included as part of the public submissions etc. that informed the original 2016 CMS therefore there should be no need for discussion on this. If the issues is around DOC wanting to restrict access to the Hāwea Conservation Area from what is currently listed in the operative CMS, a more clearly stated approach would enable educated submission.	More transparency in what DOC is trying to achieve with the addition of 'limited to'	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1480	11	Southern Eco Trails Trust	Henry van Asch	Hāwea Conservation Park	Inclusion of the Hāwea Conservation Park in this discussion box is misleading. In the proposed draft [CMS] DOC has amended the operative 2016 CMS and introduced 'limited to'. To encourage informed discussion DOC could have clarified that Table 2.2 in the current plan specifically lists 'Hāwea Conservation Park and adjacent public conservation lands and waters'. There are no limitations listed and that they have introduced a clause that has extreme consequences beyond the Kidds Bush Loop trail and Maungatika Trail.	Oppose the inclusion of 'limited to' in respect of Hāwea Conservation Park. Seek a different approach of presenting the operative CMS vs inclusions that DOC has added to the Draft CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1480	12	Southern Eco Trails Trust	Henry van Asch		Reference to "leaving the north-western areas... for users that appreciate the remoteness and natural quiet." is a peculiar reference. There appears to be a philosophical assumption here that Mountain Bikers would not fit into the category of 'users that appreciate the remoteness and natural quiet.'	Clarify whether DOC views Mountain Bikers as a user group that appreciates remoteness and natural quiet.	Reject in part The reference in the 'Discussion Box' is taken from the CMS Outcome statement for Hāwea and applies to all users not just bikers. This is the area along the main divide of the Southern Alps/ka Tiritiri. The outcome statements are not under review and have not changed.
Places	Policy 2.3.2	1480	13	Southern Eco Trails Trust	Henry van Asch	Reference to 'only as identified in Table 2.3'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.3.2 to remove 'only as identified in Table 2.3'	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	14	Southern Eco Trails Trust	Henry van Asch		Support all additions to Table 2.3	Support addition of all areas to Table 2.3	Accept in part After careful consideration, most proposed areas of pcd&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	15	Southern Eco Trails Trust	Henry van Asch	Use of limitations on parcel entries	The addition of inclusions, exceptions, limitations or other restrictive wording is contrary to the purpose of Table 2 and the review and are not appropriate in a table identifying areas where trails may be considered.	Delete any occurrence of 'limited to', 'excluding', 'avoid', 'only' etc. from the Tables in Section 2.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	16	Southern Eco Trails Trust	Henry van Asch	Arrowtown Chinese Settlement (pt)	What is (pt)?	Please clarify definition of (pt)	Accept 'Pt' is in the name of the Historic Reserve - meaning part of. There are two parts to this reserve both with the same name.

Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	17	Southern Eco Trails Trust	Henry van Asch	Conservation Area - Kinloch Foreshore	There is a limitation against this parcel - "limited to Kinloch Road only". Query whether DOC administers the road. Oppose use of the limitation.	Remove the limitation from this parcel. Clarify id DOC has authority over activities on the road.	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	18	Southern Eco Trails Trust	Henry van Asch	Conservation Area - Mt Creighton	There is a limitation against this parcel - "Proposed tracks subject to future management plan (or other appropriate document) addressing recreation opportunities on this parcel." How is this relevant as to whether or not it should be included in Table 2.3? This is an unnecessary and vague addition. Future management plans will be able to address this if and when they are created.	Retain Conservation Area - Mt Creighton in Table 2.3 but delete the limitation.	Accept in part Conservation Area Mt Creighton has been included in the CMS and the limitation retained so further investigation can be made into the recreational opportunities for this p&w. However, it has been reworded to read: 'Conservation Area - Mt Creighton: subject to recreational opportunities feasibility study outcomes.'
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	19	Southern Eco Trails Trust	Henry van Asch	Conservation Area - Rees River	There is a limitation against this parcel - "Must avoid braided river ecosystem" The current CMS includes the Rees River Marginal Strip, in places this is part of the braided river ecosystem. The inclusion of this limitation is confusing and overly prescriptive for the purpose of Table 2.3. This should be addressed when applicants are applying for specific trails.	Retain Conservation Area - Rees River in Table 2.3 but delete the limitation.	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	20	Southern Eco Trails Trust	Henry van Asch	Conservation Area - Tuckers Beach	There is a limitation against this parcel - "excluding threatened braided river ecosystem" The inclusion of this limitation is confusing and overly prescriptive for the purpose of Table 2.3. what is the definition of 'threatened'? This should be addressed when applicants are applying for specific trails.	Retain Conservation Area - Tuckers Beach in Table 2.3 but delete the limitation. Identify the parts of the braided river that are 'threatened'.	Accept This limitation has been removed. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	21	Southern Eco Trails Trust	Henry van Asch	Devils Creek Conservation Area	There is a limitation against this parcel - "excluding remnant beech forest". Why has this new exclusion been introduced? What is the definition of remnant and what measurements or analysis are used to determine this? Is the same restriction going to be put on all other users/projects on p&w such as walking tracks? Does DOC intend to ban any future trails in Beech Forests? This will have monumental impact on the future of trail building in NZ. Overly prescriptive for Table 2.3	Retain Devils Creek Conservation Area in Table 2.3 but delete the limitation.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	22	Southern Eco Trails Trust	Henry van Asch	Greenstone Road Recreation Reserve	There is a limitation against this parcel - "excluding the Cherry Gardens (Sawmill Settlement) as defined by Heritage New Zealand Pouhere Taonga". The Cherry Gardens Sawmill settlement is underused, overgrown and falling into disrepair. Archaeological recommendations to QLDC from Heritage New Zealand noted that a historic pack track exists from Kinloch to the site and continues on to the Greenstone River. I support encouraging more people to become aware of and possibly visit this area. Mountain Bikes create access to Conservation. Perhaps local cycle enthusiasts could work with Local historical societies and Heritage New Zealand Pouhere Tonga to create access to this area with a cycle track.	Delete the limitation from this parcel. Encourage DOC to facilitate like minded user groups to embark on community conservation projects. Request justification for this exclusion.	Reject in part The Greenstone Road Recreation Reserve has been included in the CMS but the limitation has been retained to protect this heritage site. However, this does not stop groups getting involved in conservation projects.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	23	Southern Eco Trails Trust	Henry van Asch	Mt Crichton Scenic Reserve	There is a limitation against this parcel - "must avoid ridgelines and beech forest damage". Why is it necessary to avoid the ridgeline? Often the most scenic and safe passage is along the ridgeline. Will these criteria also apply to new hiking trails? Why is necessary to avoid beech forest damage? Beech forests contain some of the best potential for trails in NZ. How will DOC staff address this when considering a trail application? What is the definition of damage? Will this apply to any other work or projects on the DOC estate?	Retain Mt Crichton Scenic Reserve in Table 2.3, but delete limitation.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. Mt Crichton Scenic Reserve is excluding Mt Crichton Loop Track.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	24	Southern Eco Trails Trust	Henry van Asch	Lake Rere Recreation Reserve	There is a limitation against this parcel - to stock bridge access only and not on Rere Lake Walk. These limitations are not necessary for the purpose of this CMS review.	Delete limitations from Lake Rere Recreation Reserve	Accept in part Lake Rere Recreation Reserve limitation has been revised to read 'subject to minimum impact and limited access to the Rere Lake Walk'.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	25	Southern Eco Trails Trust	Henry van Asch	Lake Wakatipu Marginal Strip	All marginal strips should be included in Table 2.3. This is an example of one that has raised questions. What values do the other parts of the Marginal Strip have that necessitated its exclusion?	Delete mention of individual marginal strips and have one overarching inclusion of all marginal strips OR Provide conservation values that justify exclusion of certain areas of marginal strips as they relate to 24c of the Conservation Act.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	26	Southern Eco Trails Trust	Henry van Asch	McChesney's Conservation Area	There is a limitation against this parcel - to 'several tracks' (proposed track). Seems vague and unnecessary to qualify in this way.	Retain McChesney's Conservation Area in Table 2.3, but delete limitation.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	27	Southern Eco Trails Trust	Henry van Asch	Rastus Burn Recreation Reserve	There is a limitation against this parcel - to 'Remarkables Downhill Track (existing); and proposed tracks (must avoid ridgelines and prominent landscape features)'. The limitation relating to avoiding ridgelines does not make sense. Seek clarity as to why the reference to avoiding prominent landscape features has been included - what is the definition of 'avoid'? Rude Rock Trail is one of the region's shining assets, it is named after, raises awareness of, and encourages people to appreciate this prominent landscape feature. When is a landscape feature prominent? for instance, the Remarkables Downhill Track arguably sits on our most public and prominent landscape feature - The Remarkables. How would this limitation be administered?	Remove limitations from Rastus Burn Recreation Reserve	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	28	Southern Eco Trails Trust	Henry van Asch	Remarkables Conservation Area	There are various limitations against this parcel, including inconsistent references to the need to avoid/be limited to ridgelines. These inconsistencies reinforce the need to keep Table 2.3 free of limitations which can be efficiently addressed in the trail application phase.	Remove limitations from Remarkables Conservation Area.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	29	Southern Eco Trails Trust	Henry van Asch	Remarkables Conservation Area	There is a limitation on this parcel referring to 'existing easements where mountain biking is allowed'. Why is this here? Who manages these easements?	Remove this limitation from Remarkables Conservation Area or amend wording to "including any easements..."	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1480	30	Southern Eco Trails Trust	Henry van Asch	Whakaari Conservation Area	This area lends itself to great potential to expand an asset that has been developed by the community. There is no need to specify a moratorium on future trail development. This is unnecessary. DOC recently provided an 'access agreement' to enable mining in this conservation area that allows for significantly more access to areas with heavy machinery than is being proposed for mountain bikes. How does DOC compare mining activities as compared to the building of bike trails?	Remove limitations from Whakaari Conservation Area Engage with the relevant local community association to get their views before assuming these limits are supported.	Reject Whakaari Conservation Area was listed in the CMS prior to the partial review but was not available for the consideration of new bike tracks as it was limited to existing tracks. This p&w has significant conservation values, including the recreation activities already occurring. It is considered the cumulative effects of further tracks would have unacceptable impacts. The limitation of existing tracks only remains. The access arrangement issued for a limited period of time was for a specific number of test drilling sites, with minimal impact.
Places	Policy 2.4.5	1480	31	Southern Eco Trails Trust	Henry van Asch	Reference to 'only as identified in Table 2.4'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.4.5 to remove 'only as identified in Table 2.4'	Reject See standard response.
Places	Policy 2.5.6	1480	32	Southern Eco Trails Trust	Henry van Asch	Reference to 'only as identified in Table 2.5'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.5.6 to remove 'only as identified in Table 2.5'	Reject See standard response
Places	Policy 2.6.10	1480	33	Southern Eco Trails Trust	Henry van Asch	Reference to 'only as identified in Table 2.6'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.6.10 to remove 'only as identified in Table 2.6'	Reject See standard response
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	1480	34	Southern Eco Trails Trust	Henry van Asch	Mahaka Katia Scientific Reserve	A more appropriate question would be to ask if mountain biking and e-biking should be allowed in Table 2.6 to allow DOC and the applicant to properly consider the project. Support including this parcel in Table 2.6. This will allow DOC to properly consider the trail and determine any significant effects and whether they can be avoided or mitigated; and undertake public notification if necessary. Submitters to this review do not have enough information or the opportunity to assess positive aspects of the project to decide whether it should or should not be allowed. It is also beyond the remit of the current review.	Include Mahaka Katia Scientific Reserve in Table 2.6.	Reject Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Places	Policy 2.7.13	1480	35	Southern Eco Trails Trust	Henry van Asch	Reference to 'only as identified in Table 2.7'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.7.13 to remove 'only as identified in Table 2.7'	Reject See standard response
Places	Policy 2.8.7	1480	36	Southern Eco Trails Trust	Henry van Asch	Reference to 'only as identified in Table 2.8'	Oppose. Neither the Conservation Act nor the General Policy require trails to be identified [in a CMS].	Amend Policy 2.8.7 to remove 'only as identified in Table 2.8'	Reject See standard response
Specific Policy Requirements	3.3. MTB-intro text	1480	37	Southern Eco Trails Trust	Henry van Asch	E-bikes	Support the approach to managing e-bikes and mountain bikes together.	Support the addition of e-bikes to section 3.3.	Accept
Specific Policy Requirements	3.3. MTB-intro text	1480	38	Southern Eco Trails Trust	Henry van Asch	Terminology	Seems to be a lack of consistency when describing mountain biking and e-mountain bikers; mountain bike tracks and cycling tracks. In terms of downhill, there is relatively little difference between the two.	Suggest using the term 'mountain bikers' and 'mountain bike tracks' or 'bike tracks' throughout.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes, which includes e-bikes and definitions have been added to the Glossary.
Specific Policy Requirements	3.3. MTB-intro text	1480	39	Southern Eco Trails Trust	Henry van Asch	Downhill	Reference is made to a need for more caution when considering downhill cyclists.	Replace with 'Should consider this and ways to mitigate risk, such as one-way trails, or signage'.	Accept in part On p&w caution is required when considering high speed and high impact activity. Consideration of the style of biking proposed on p&w has been added as a consideration under the 3.3 Policies and Policy 3.3.10 has been deleted.
Specific Policy Requirements	Policy 3.3.1	1480	40	Southern Eco Trails Trust	Henry van Asch	Terminology	Support the addition of e-biking into the same policies as mountain biking. For greater simplicity perhaps a definition of mountain biking that includes e-bikes (cycling) could occur in 3.3 and negate the repetitive nature of most of the policies.	Suggest providing a definition of mountain biking as including e-bikes and amending policies accordingly.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes, which includes e-bikes and definitions have been added to the Glossary.
Specific Policy Requirements	Policy 3.3.4	1480	41	Southern Eco Trails Trust	Henry van Asch		Support deletion of the reference to needing to follow the statutory amendment or review process.	Delete Policy 3.3.4 and roll back to previous policies 3.3.5 and 3.3.6 (deleting requirement to follow statutory amendment or review process).	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1480	42	Southern Eco Trails Trust	Henry van Asch		Oppose insertion of 'not identified in Policy 3.3.1' and of clause a) requiring a statutory amendment or review process to be followed.	Delete Policy 3.3.4	Reject See standard response.
Specific Policy Requirements	Policy 3.3.5	1480	43	Southern Eco Trails Trust	Henry van Asch		This policy (as well as Policy 3.3.4 and 3.3.6) is overly onerous, restrictive and in many places redundant. It introduces three processes and significant layers of bureaucracy when one robust process would do.	Revert to the policies in the original Draft CMS as part of the 2016 review. Work with stakeholders to rework this [policy] into a functional management set of policies.	Reject See standard response. The partial review has added parcels of p&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.4	1480	44	Southern Eco Trails Trust	Henry van Asch		This [policy] allows DOC to consider if they will accept an application. There is no need for any of the [amendments to this policy] except for the deletion of the requirement to follow the statutory amendment or review process in two places.	Accept deletion and reject insertion of 'follow the statutory amendment or review process'.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.5	1480	45	Southern Eco Trails Trust	Henry van Asch	Criterion (a)	This is how DOC will assess a [track] proposal, but is not what is considered to grant authorisation to construct and maintain it. There appears to be no consideration as to the positive effects of the application. This should be added to the assessment criteria.	Amend Policy 3.3.5(a) to include "The positive conservation and recreation outcomes achieved as a part of this project" (or similar)	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.

Specific Policy Requirements	Policy 3.3.5	1480	46	Southern Eco Trails Trust	Henry van Asch	Criterion (b)	This criterion is an arbitrary way to say no (to a track proposal). How will an assessment of the long-term effects of climate change be performed, what triggers would affect an either positive or negative decision on an application?	Delete Policy 3.3.5(b).	Reject The long-term effects of climate change, including flooding and coastal erosion need to be a consideration of any proposal to determine if they are relevant. Policy 3.3.5 (now 3.3.6) b) has been revised to read: 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.'
Specific Policy Requirements	Policy 3.3.5	1480	47	Southern Eco Trails Trust	Henry van Asch			Applicants should be able to take part in this consultation and/or present to conservation boards at a regularly scheduled meeting.	Reject in part Meetings with the Conservation Board are not a consideration of the partial review, however members of the public are able to meet with the Conservation Board.
Specific Policy Requirements	Policy 3.3.5	1480	48	Southern Eco Trails Trust	Henry van Asch	Criterion (g)	Suggest that a new way of approaching this where applicants and DOC staff engage in this consultation together as opposed to the current procedures.	Support active cooperation between applicants and DOC regarding consultation.	Reject in part This is not a consideration that needs to be addressed in the CMS.
Specific Policy Requirements	Policy 3.3.5	1480	49	Southern Eco Trails Trust	Henry van Asch	Criterion (h)	How will level of demand be determined, and by whom? Is this a standard condition for DOC or is it specific to Mountain Bike trails? This could be subjective and difficult to assess. If an applicant has come to DOC for approval, it is likely that they are confident of demand to a point where they are initiating and paying for the project.	Delete Policy 3.3.5(h)	Accept in part This Policy has been amended to determine the right opportunity is being provided in the right place. It is also elsewhere in the CMS. In particular Section 1.5.3 Recreation, Objective 1.5.3.1 and would be applied to other developments such as walking tracks and visitor facilities.
Specific Policy Requirements	Policy 3.3.5	1480	50	Southern Eco Trails Trust	Henry van Asch	Criterion (i)	This will greatly stifle many community projects. Most projects seek to secure permission ahead of creating a fund-raising campaign.	Delete Policy 3.3.5(i); or Amend to 'Some approvals may be on the condition to demonstrate adequate funds or funding strategies'	Accept This Policy has been amended to read: 'if the ability to generate adequate funding ...'
Specific Policy Requirements	Policy 3.3.6	1480	51	Southern Eco Trails Trust	Henry van Asch		Policy 3.3.6 outlines considerations mainly covered in Policies 3.3.4 and 3.3.5.	Suggest combining Policies 3.3.4, 3.3.5 and 3.3.6 (and removing redundant policies).	Reject See standard response. The partial review has added parcels of p&w to the CMS and allow the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.7	1480	52	Southern Eco Trails Trust	Henry van Asch			Combine [Policy 3.3.7] with other policies in this section and remove redundant policies	Reject Policy 3.3.7 provides guidance for controls to be included in an authorisation if considered necessary to manage adverse effects. These matters are not addressed elsewhere in the Policies.
Specific Policy Requirements	3.4. Electric power-assisted pedal cycles	1480	53	Southern Eco Trails Trust	Henry van Asch		Support deletion of this clause and combining management with Mountain Bikes.	Support deletion of clause 3.4	Accept
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikiri a Rākaiahaū Place	1480	54	Southern Eco Trails Trust	Henry van Asch		I am not aware of any submitters who were consulted on these outcomes. Some of the assumptions require further clarification, such as: - the effects of cycling and how they are calculated; - the methodology that is used to determine 'important tramping values' - whether representatives from the Te Ararua Trail were consulted in reaching this position; - How significant change is assessed; - whether all change is considered negative; - Whether positive effects of significant change were assessed (and provide the assessment); - How DOC determined that cycling is not compatible with a backcountry experience; - Why narrowness of track is suitable for hikers and cattle, but not hikers and bikers; - How DOC equates more people riding bikes to more people walking dogs; - There appears to be an overly negative view on MTB in the Catlins area. Urge DOC to revisit this to see what opportunities could be enabled with a more proactive approach to recreational management.	Submission summarised	Accept in part After careful consideration, most proposed areas of p&w have been added to the CMS, so a bike track can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies. Some areas of p&w in Catlins Place remain excluded to protect wildlife values.
General	general comments	1542	1	Clutha District Council	Jules Witt	2.8 Description	Amend the description of the Catlins Place in 2.8 to include reference to future cycleway development	Amend the description of the Catlins Place in 2.8 as follows: "There is an opportunity to establish an extended coastal walk and include future cycle way development."	Reject in part The paragraph detailing the opportunity for the establishment of the extended coastal walkway was not included in the partial review. The cycle trail developments are those listed in Table 2.8
General	general comments	1542	2	Clutha District Council	Jules Witt	Policy 2.8.4	Support this policy	No relief specified.	Reject Policy 2.8.4 is outside the scope of this partial review.
General	general comments	1542	3	Clutha District Council	Jules Witt	Policy 2.8.5	Support this policy	No relief specified.	Reject Policy 2.8.5 is outside the scope of this partial review.
General	general comments	1542	4	Clutha District Council	Jules Witt	Policy 2.8.6	Amend this policy to refer to new cycling tracks (as well as walking tracks).	Amend Policy 2.8.6 as follows: "May consider development of new recreational tracks on public conservation lands and waters in the Catlins/Te Ākau Tai Tōka Place (including community-led initiatives for new public walking tracks and cycle way developments), where adverse impacts..."	Accept in part The example in this Policy uses a new public walking track but the change is not required as the cycle way development or mountain bike track is captured by 'new recreational tracks' at the start of the policy.
Places	Policy 2.8.7	1542	5	Clutha District Council	Jules Witt	Policy 2.8.7	Amend the policy to exclude mountain bikes from the vehicle category.	Reward policy to exclude 'mountain bike' from the vehicle category.	Reject The function of this policy is to set the scene for where access for all three types of vehicles can occur. No change required.
Specific Policy Requirements	3.3. MTB-intro text	1542	7	Clutha District Council	Jules Witt		Amend the introductory text to include reference to the opportunities that exist in the Catlins along with the other key trails referenced.	Amend the introductory text in 3.3. to include "The Catlins is another area which would benefit from future walkway and cycleway development opportunities."	Reject Walkways are not part of the partial review. Where biking can occur is listed in Table 2.8 and any new proposal would be subject to the Policies in 3.3.
Places	Table 2.8: Access to Catlins Place	1542	8	Clutha District Council	Jules Witt	Catlins Coastal Trail	Add all parcels that are affected by the Catlins Coastal Trail to Table 2.8.	Add all parcels that are affected by the Catlins Coastal Trail to Table 2.8.	Reject Much of the Catlins Coastal Trail remains unapproved and has not been included in the CMS, due to impacts of threatened species and their habitats and the significant hazards present.
Specific Policy Requirements	Policy 3.3.4	1542	9	Clutha District Council	Jules Witt	Criterion (a)		Delete criterion (a) requiring a statutory review process.	Reject See standard response.
Places	Table 2.8: Access to Catlins Place	1542	10	Clutha District Council	Jules Witt			Add to the top of Table 2.8 "contents may be amended, reviewed or updated during the term of this CMS as detailed in 3.3.4."	Reject See standard response.

Places	Table 2.8: Access to Catlins Place	1542	11	Clutha District Council	Jules Witt	Catlins Traverse Track	Support the land parcels [that contribute to this trail] being included in the CMS. Refer to the submission for details as to how the trail proposal will relate to natural values, construction impacts, visual effects and managing conflicts with other users.	No relief sought, presume to retain those parcels that the track proposes to traverse in the CMS.	Reject After careful consideration, most of the areas of p&l&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&l&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.8: Access to Catlins Place	1542	12	Clutha District Council	Jules Witt	Catlins Lake Track	Add all parcels that are affected by the Catlins Lake Trail to Table 2.8.	Add all parcels that are affected by the Catlins Lake Trail to Table 2.8.	Reject Neither Catlins Lake (Kuramea) Scenic Reserve or Catlins Lake (Kuramea) Marginal Strip have been included in the CMS. A cycle track will cause fragmentation of the saltmarsh habitat and ongoing disturbance to wildlife values. Recommended the use of the existing road which runs alongside the reserve.
Places	Table 2.8: Access to Catlins Place	1542	14	Clutha District Council	Jules Witt	Catlins Rail Track	Support the land parcels [that contribute to this trail] being included in the CMS. Refer to the submission for details as to how the trail proposal will relate to natural values, construction impacts, visual effects and managing conflicts with other users.	No relief sought, presume to retain those parcels that the track proposes to traverse in the CMS.	Accept While most of this track is not on p&l&w the Table Hill Scenic Reserve is included in the CMS.
Specific Policy Requirements	Policy 3.3.5	1547	1	Otago Fish and Game Council	Nigel Paragreen	critereon (f)	Fish and Game supports in part the criteria listed in Policy 3.3.5. The relevant Sports Fish and Game Council should be specifically considered for consultation. As outlined in the other parts of F&G submission, some activities managed by the Council are sensitive to or incompatible with cycle trails. Fish and Game has a statutory interest, which is separate to the interests listed in 3.3.5(g).	Amend Policy 3.3.5(f) as follows: "f) consultation with relevant conservation boards and Fish and Game Councils."	Accept A new criteria has been added to Policy 3.3.5 to read 'if consultation with relevant Fish and Game Councils is required'.
Specific Policy Requirements	3.3. MTB-intro text	1547	1	Otago Fish and Game Council	Nigel Paragreen		Fish and Game is supportive of the changes to the wording of sections 3.3 and 3.4. Amalgamation of the two sections simplifies and modernises the CMS. However, amendments do not appear to have addressed the structural issue of the CMS needing to be reviewed to enable consideration of bike trails in new areas. Fish and Game is concerned that this inflexibility has created a gold rush style mentality for cycle trail development, may lead to oversupply. It appears a resolution to this issue is outside the scope of this review - even if it is possible with current legislation.	No specific relief, but see other submission points for particular amendments to policies.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.5	1547	2	Otago Fish and Game Council	Nigel Paragreen	New criterion	When considering the development of a new cycle trail, regard should be given to relevant management plans, including the Sports Fish and Game Management Plan. This plan for Otago is inherently useful in identifying catchments where the development may put recreational users in conflict.	Amend Policy 3.3.5 to add a new criterion as follows: "x) consistency with relevant management plans and strategies prepared under the Conservation Act 1987 and other Acts."	Accept in part This criteria does not need to be added to Policy 3.3.6. However, a new criteria has been added to read 'if consultation with relevant Fish and Game Councils is required'.
Specific Policy Requirements	Policy 3.3.5	1547	3	Otago Fish and Game Council	Nigel Paragreen	Criterion (c)	Policy 3.3.5 should be amended to enable DOC to gather information via specialist reports to assess adverse effects on recreation and amenity.	Amend Policy 3.3.5 (c) to add a new sub-criterion as follows: "c) if specialist reports are required, to assess the adverse effects of the cycle track or trail, including but not limited to: ... v. recreation and amenity."	Accept Recreational values has been added to Policy 3.3.6 (c).
Accompanying Info	2.8 Catlins/Te Ākua Tai Toka Place	1547	4	Otago Fish and Game Council	Nigel Paragreen	Catlins Lake (Kuramea) Scenic Reserve	Fish and Game staff have identified this [parcel] as a hunting area and an area where waterfowl and wetlands are sensitive to disturbance.	Note that F&G seeks removal of this parcel from Table 2.8 but it was one of the parcels that DOC team did not recommend be put forward - is included in the 'recommended decline' list.	Accept Catlins Lake (Kuramea) Scenic Reserve has not been included in the revised CMS.
Places	Table 2.4: Access to Central Otago Uplands Place	1547	5	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Dunstan Creek	Dunstan Creek is a backcountry fishery and additional tracks along the marginal strip would affect its character. Fish and Game is opposed to new tracks, however, is neutral to bikes travelling along an existing 4wd track.	No specific relief sought, however presume seek amendment to this entry to limit cycle use to existing 4WD track.	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. A new criteria has been added to Policy 3.3.6 to read 'if consultation with relevant Fish and Game Councils is required'.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1547	6	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Manuhēkia River Catchment	The Manuhēkia River above Falls Dam is a backcountry fishery. The area is largely accessible by 4WD already. A cycle trail along the river will disturb the amenity of the fishery and is unnecessary, as cyclists can follow formed roads which are close by. However, cycle trails along Rocks Creek are of no concern to Fish and Game. (see submission for more context around the backcountry fisheries in Otago).	No specific relief sought, however presume seek amendment to this entry to limit cycle use to existing 4WD track on the Manuhēkia River above Falls Dam, but no issue with cycle trails along Rocks Creek.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1547	7	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Lochy River	Fish and Game opposes the inclusion of this parcel in the CMS. The Lochy River has been identified as a backcountry river of national importance (see submission for further details).	Remove Marginal Strip - Lochy River from Table 2.3	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. A new criteria has been added to Policy 3.3.6 to read 'if consultation with relevant Fish and Game Councils is required'.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1547	8	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Lake Wakatipu (Whakatipu-wai-māori) (2804920)	Fish and Game opposes the inclusion of this parcel in the CMS. This particular marginal strip parcel also runs along the Lochy River. The Lochy River has been identified as a backcountry river of national importance (see submission for further details).	Remove Marginal Strip - Lake Wakatipu (Whakatipu-wai-māori) (2804920) from Table 2.3	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. A new criteria has been added to Policy 3.3.6 to read 'if consultation with relevant Fish and Game Councils is required'.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1547	9	Otago Fish and Game Council	Nigel Paragreen	Von River Marginal Strip	Fish and Game opposes the inclusion of this parcel in the CMS. The Von is a backcountry river and there is a formed road adjacent, which can serve cyclists. Fish and Game is opposed to trails along the marginal strip. However, if the associated limitation refers only to cycle trails being able to cross the river on the trail via the QTT Queenstown to Walter Peak Trail, shown on the map as only crossing the river near the confluence, then Fish and Game is neutral to the proposal. In this case, the language should be made clear so that the location of the one crossing is easily identified.	Either remove Von River Marginal Strip from Table 2.3; or amend to make it clear that only one crossing is enabled, and the location of the crossing.	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. A new criteria has been added to Policy 3.3.6 to read 'if consultation with relevant Fish and Game Councils is required'.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1547	10	Otago Fish and Game Council	Nigel Paragreen	Greenstone Road Recreation Reserve	Fish and Game opposes the inclusion of this parcel in the CMS (where adjacent to the Greenstone River). The Greenstone is a backcountry fishery of national importance. It already has a controlled fishery to manage recreational pressure upstream of this parcel (and Lake Rere Recreation Reserve - see 1547/11)	Remove Greenstone Road Recreation Reserve from Table 2.3.	Reject in part The Greenstone Road Recreation Reserve has been included in the CMS but the limitation has been retained to protect this heritage site. However, consultation with relevant Fish and Game Councils is required has been added to the 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1547	11	Otago Fish and Game Council	Nigel Paragreen	Lake Rere Recreation Reserve	Fish and Game opposes the inclusion of this parcel in the CMS (where adjacent to the Greenstone River). The Greenstone is a backcountry fishery of national importance. It already has a controlled fishery to manage recreational pressure upstream of this parcel (and Greenstone Road Recreation Reserve - see 1547/10)	Remove Lake Rere Recreation Reserve from Table 2.3	Accept in part Lake Rere Recreation Reserve limitation has been revised to read 'subject to minimum impact and limited access to the Rere Lake Walk'.

Places	Table 2.3: Access to Western Lakes and Mountains Place	1547	12	Otago Fish and Game Council	Nigel Paragreen	Diamond Lake & Lake Reid Wildlife Management Reserve	Fish and Game supports in part the inclusion of this parcel in Table 2.3. Diamond Creek is a backcountry fishery and Diamond Lake is valued for its remote characteristics. Impacts will be mitigated by the restrictions in Table 2.3, which ensure cycling is kept to existing tracks and roads. Provided use rates are kept reasonably low to minimise disturbance to anglers and wildlife in the reserve, Fish and Game is supportive of the proposal. This may be achieved through the use of restrictions on cycling if it becomes so popular in the future that the character of the place changes.	No specific relief sought.	Accept
Places	Table 2.4: Access to Central Otago Uplands Place	1547	13	Otago Fish and Game Council	Nigel Paragreen	Conservation Area - Clutha River Islands	Fish and Game opposes the inclusion of this parcel in the CMS. This (and other parcels between Lake Dunstan and the Lindis confluence) are used for hunting, which may be pushed out if a cycle trail were to be built. The Lake Dunstan delta and associated areas immediately upstream contain habitat for waterfowl which are sensitive to disturbance.	Note that F&G submission refers to 'Clutha River Parcels between Lake Dunstan and the Lindis Confluence'; I have deduced that these are the parcels based on the public GIS project viewer.	Reject in part Conservation Area - Clutha River Island has been added to the CMS. However, Fish and Game have been added the policies in 3.3, if consultation is required.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1547	14	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Nevis River	Fish and Game opposes the inclusion of this parcel in the CMS. The Nevis is a backcountry fishery with voluntary controls in place to manage existing excessive recreational pressure. A suitable formed road exists along the river which cyclists could use. There is no need for duplication.		Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. A new criteria has been added to Policy 3.3.6 to read 'if consultation with relevant Fish and Game Councils is required'.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	1547	15	Otago Fish and Game Council	Nigel Paragreen		Fish and Game supports the recommendation that parcels in the wider Greenstone and Caples catchments be not supported, as these are backcountry fisheries of national significance whose character should be protected.	The Wider Greenstone And Caples Catchments Be Not Supported, As These Are Backcountry Fisheries Of National	Reject After careful consideration Conservation Area Greenstone has been added to Table 2.3, so a cycle trail in this area can be investigated. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.6: Access to Central Otago Drylands Place	1547	17	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Dunstan Creek	Dunstan Creek is a backcountry fishery and additional tracks along the marginal strip would affect its character. Fish and Game is opposed to new tracks, however, is neutral to bikes travelling along an existing 4wd track.	No specific relief sought, however presume seek amendment to this entry to limit cycle use to existing 4WD track.	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. A new criteria has been added to Policy 3.3.6 to read 'if consultation with relevant Fish and Game Councils is required'.
Places	Table 2.4: Access to Central Otago Uplands Place	1547	18	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Clutha River (2804748)	Fish and Game opposes the inclusion of this parcel in the CMS. This (and other parcels between Lake Dunstan and the Lindis confluence) are used for hunting, which may be pushed out if a cycle trail were to be built. The Lake Dunstan delta and associated areas immediately upstream contain habitat for waterfowl which are sensitive to disturbance.	Note that F&G submission refers to 'Clutha River Parcels between Lake Dunstan and the Lindis Confluence'; I have deduced that these are the parcels based on the public GIS project viewer.	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.4: Access to Central Otago Uplands Place	1547	19	Otago Fish and Game Council	Nigel Paragreen	Marginal Strip - Clutha River (2804747)	Fish and Game opposes the inclusion of this parcel in the CMS. This (and other parcels between Lake Dunstan and the Lindis confluence) are used for hunting, which may be pushed out if a cycle trail were to be built. The Lake Dunstan delta and associated areas immediately upstream contain habitat for waterfowl which are sensitive to disturbance.	Note that F&G submission refers to 'Clutha River Parcels between Lake Dunstan and the Lindis Confluence'; I have deduced that these are the parcels based on the public GIS project viewer.	Reject Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.4: Access to Central Otago Uplands Place	1547	20	Otago Fish and Game Council	Nigel Paragreen	Conservation Area - Clutha River/South Lindis	Fish and Game opposes the inclusion of this parcel in the CMS. This (and other parcels between Lake Dunstan and the Lindis confluence) are used for hunting, which may be pushed out if a cycle trail were to be built. The Lake Dunstan delta and associated areas immediately upstream contain habitat for waterfowl which are sensitive to disturbance.	Note that F&G submission refers to 'Clutha River Parcels between Lake Dunstan and the Lindis Confluence'; I have deduced that these are the parcels based on the public GIS project viewer.	Reject in part Conservation Area - Clutha River/South Lindis has been added to the CMS. However, Fish and Game have been added the policies in 3.3, if consultation is required.
Places	Table 2.4: Access to Central Otago Uplands Place	1547	21	Otago Fish and Game Council	Nigel Paragreen	Conservation Area - Clutha River Islands	Fish and Game opposes the inclusion of this parcel in the CMS. This (and other parcels between Lake Dunstan and the Lindis confluence) are used for hunting, which may be pushed out if a cycle trail were to be built. The Lake Dunstan delta and associated areas immediately upstream contain habitat for waterfowl which are sensitive to disturbance.	Note that F&G submission refers to 'Clutha River Parcels between Lake Dunstan and the Lindis Confluence'; I have deduced that these are the parcels based on the public GIS project viewer.	Reject in part Conservation Area - Clutha River Island has been added to the CMS. However, Fish and Game have been added the policies in 3.3, if consultation is required.
Places	Table 2.4: Access to Central Otago Uplands Place	1568	1	Quail Terraces Limited	Johnathan & Toni Bird	Newcastle Scenic Reserve	We oppose the introduction of this section of proposed track (Newcastle Track Extension - Upper Clutha Trails Trust) that will surround our property on three boundaries. The track will have a significant impact on our general amenity, privacy and property security. We have never been consulted on the location of this proposal and have noted since the recent introduction of a 'trial track' which this proposal will formalise, there has been ongoing conflict between other scenic reserve users such as moto-cross riders, 4x4 off-roaders, illegal freedom campers and shooters.	Oppose the formation of a track/trail on the Newcastle Scenic Reserve.	Accept in part Newcastle Scenic Reserve has been included in the CMS. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including consultation with adjoining landowners, conservation assessments and if there is a need for further public consultation.
General	general comments	1569	1	Joseph Mooney	Mapping		Support all tracks indicated on the interactive mapping across Otago. Cycling is a key way that modern communities access the conservation estate, engage with our natural landscapes, improve the health of our communities, provide alternative forms of transport, and create low impact economic opportunities. Creation of trails for this purpose also provide opportunities for other groups focussed on pest elimination, wilding tree control, and native reforestation. Key to the ongoing health and wellbeing of our communities that we are able to have an ongoing discussion about where new cycle trails should be developed to support and further these objectives.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	3.3. MTB-intro text	1569	2	Joseph Mooney	E-bikes		I oppose most proposed amendments to Policy 3.3.4, but I support the addition of 'and e-biking (cycling) throughout 3.3.1 - 3.3.4.	No relief specified, presumably to retain the combined approach to MTB and e-bikes (cycling)	Reject in part See standard response. E-biking has been retained.
Specific Policy Requirements	Policy 3.3.4	1569	3	Joseph Mooney			I support removal of 'should follow the statutory review process' from Policy 3.3.4	No relief specified.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.5	1569	4	Joseph Mooney			Support the amendment of 'should assess' to 'may assess' for the reasons outlined by the Queenstown Trails Trust in their submission.	No relief specified, but presume to retain this wording.	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered cycle trail proposals. Discretion applies to those criteria that start with 'if...required'.
Specific Policy Requirements	Policy 3.3.5	1569	5	Joseph Mooney	Additional criterion		Support the Queenstown Trails Trust submission that an additional criterion be added to Policy 3.3.5 to enable consideration of positive effects associated with cycling. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to include an additional sub-criterion: <i>x) The positive effects on the purpose and outcomes for the place.</i>	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.

Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1569	6	Joseph Mooney	Conservation Area - Greenstone	Oppose DOC ruling out the possibility of e-biking and mountain biking trails in these conservation areas - DOC has proven with the new Paparoa Trail that dual use Great Walk/Cycle Trails are possible, and in my view that fantastic initiative by DOC should be encouraged.	No relief specified, but presume to add this parcel to the CMS.	Accept in part. Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1569	7	Joseph Mooney	Conservation Area - Mavora Lakes (Manawapōpōre/Hikuraki)	Oppose DOC ruling out the possibility of e-biking and mountain biking trails in these conservation areas - DOC has proven with the new Paparoa Trail that dual use Great Walk/Cycle Trails are possible, and in my view that fantastic initiative by DOC should be encouraged.	No relief specified, but presume to add this parcel to the CMS.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1569	8	Joseph Mooney	Moke Lake Recreation Reserve	Oppose the removal of cycling on the Peninsula portion of the Moke Lake Loop Track.	No relief specified, but presume to remove the limitation to this effect from this parcel.	Reject Moke Lake Recreation Reserve has been retained however the peninsula portion of the Moke Lake Loop Track is excluded due to health and safety concerns and the track not being suitable for shared use.
General	general comments	1570	1	John Williamson	Mountain Bikers of Alexandra Incorporated (MOA)	MOA supports all the additional areas for biking inserted into the CMS partial review.	No specific relief sought	Accept After careful consideration, most proposed areas of po&w have been added to the CMS, so a bike track can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1570	2	John Williamson	Oteake Conservation Park	Support inclusion of this parcel excluding the Buster Diggings site	Retain this provision	Accept
Places	Table 2.5: Access to Old Man Range/Kopuwai, Old Woman Range, and Garvie Mountains Place	1570	3	John Williamson	Mountain Bikers of Alexandra Incorporated (MOA)	Support the inclusion of the catch all clause to enable bicycles to access areas "where motorised vehicles are provided for in this table as above - Motorised vehicle access."	Retain this provision	Accept
Places	Table 2.5: Access to Old Man Range/Kopuwai, Old Woman Range, and Garvie Mountains Place	1570	4	John Williamson	Kopuwai Conservation Area	Support inclusion of this parcel	Retain this provision	Accept
Places	Table 2.5: Access to Old Man Range/Kopuwai, Old Woman Range, and Garvie Mountains Place	1570	5	John Williamson	Scenic Reserve - Barn Creek	Support inclusion of this parcel	Retain this provision	Accept
Places	Table 2.5: Access to Old Man Range/Kopuwai, Old Woman Range, and Garvie Mountains Place	1570	6	John Williamson	Old Man Range Scenic Reserve	Request inclusion of this parcel. This was included in our proposal for inclusion but must have been missed in the draft as it is coloured white in the interactive map viewer. This is a small area connecting with the South end of the Old Man Range at Hyde Rock and borders the Conservation Area that will be created if the Glenaray Station tenure review is concluded. There is the potential for new tracks on the Kopuwai Conservation Area to extend into this parcel.	Include this parcel in Table 2.5	Accept You are correct this had been missed. Old Man Range/Kopuwai Scenic Reserve has been added to Table 2.5.
Places	Table 2.5: Access to Old Man Range/Kopuwai, Old Woman Range, and Garvie Mountains Place	1570	7	John Williamson	Bain Block Conservation Area (LINZ Parcel ID 3033086 Run 758 and Parcel ID 3154277 Run 758)	Request inclusion of this parcel. This parcel is coloured green and supported on the interactive map viewer but is not specified in the Table so must be an omission. This is a small area connecting with the South end of the Old Man Range at Hyde Rock and borders the Conservation Area that will be created if the Glenaray Station tenure review is concluded. There is the potential for new tracks on the Kopuwai Conservation Area to extend into this parcel.	Include this parcel in Table 2.5	Accept Bain Block (Old Man Range/Kopuwai) Conservation Area was available for motorised vehicles and has now been included in Table 2.5 available for biking.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	8	John Williamson	Mountain Bikers of Alexandra Incorporated (MOA)	Support the inclusion of the catch all clause to enable bicycles to access areas "where motorised vehicles are provided for in this table as above - Motorised vehicle access."	Retain this provision	Accept
Places	Table 2.6: Access to Central Otago Drylands Place	1570	9	John Williamson	Aldinga Conservation Area	Support inclusion of this parcel	Retain this provision	Accept
Places	Table 2.6: Access to Central Otago Drylands Place	1570	10	John Williamson	Blackstone Hill Conservation Area	Support inclusion of this parcel	Retain this provision	Accept
Places	Table 2.6: Access to Central Otago Drylands Place	1570	11	John Williamson	Flat Top Hill Conservation Area	Support inclusion of this parcel	Retain this provision	Accept
Places	Table 2.6: Access to Central Otago Drylands Place	1570	12	John Williamson	Clutha River and Clutha/Mata-au Marginal Strips	Support inclusion of these parcels	Retain this provision	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	13	John Williamson	Marginal Strip - Clutha River/Mata-Au (2799923, 2799924, 2799943)	Support inclusion of these parcels	Retain this provision	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	14	John Williamson	Flat Top Hill Conservation Area	In our proposals for inclusion, we requested that the Flat Top Hill Conservation Area include the indicative tracks marked on the plan accompanying our proposal; and further tracks that MOA identifies in future for development and that are approved by DOC for construction. While the parcel is shown as green on the map, there is no reference to these trails in the table, which appears to be an omission.	Amend the entry for Flat Top Hill Conservation Area to include "new cycle tracks in the Flat Top Hill Conservation Area constructed in accordance with Policies 3.3.5 and 3.3.6."	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.

Places	Table 2.6: Access to Central Otago Drylands Place	1570	15	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	Flat Top Hill Scenic Reserve	In our proposals for inclusion, we requested that the Flat Top Hill Scenic Reserve include the indicative tracks marked on the plan accompanying our proposal; and further tracks that MOA identifies in future for development and that are approved by DOC for construction. While the parcel is shown as green on the map, there is no reference to these trails in the table, which appears to be an omission.	Amend the entry for Flat Top Hill Scenic Reserve to include "new cycle tracks in the Flat Top Hill Scenic Reserve constructed in accordance with Policies 3.3.5 and 3.3.6."	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	16	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	Marginal Strip - Clutha River/Mata-Au (2799923, 2799924, 2799943)	We believe that this extends south only as far as Mutton Town Gully. It is difficult to determine if there is any conservation land south of this point (on the East bank), but if there is, it needs to be included in Table 2.6.	Ensure Table 2.6 contains all the conservation land down the full length of the east bank of the Clutha/Mata-au River from Clyde to Alexandra.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	17	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	Marginal Strip - Clutha River/Mata-Au	The interactive viewer supports NaPALIS 2799912 and NaPALIS 3429500 but they are not included in the Tables.	Update Table 2.6 to include these marginal strips	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	18	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	Marginal Strip - Clutha River/Mata-Au (2799925)	This parcel is limited to the Roxburgh Gorge Trail	Amend entry to remove limitation.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	19	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson		MOA supports the inclusion of the marginal strip down the east bank of the Clutha River/Lake Roxburgh from Graveyard Gully to McKenzies Beach, which is coloured green and supported on the interactive map viewer. Table 2.6 includes: - Graveyard to Butchers Point Track (existing) - Lake Roxburgh Walkway (existing) - Lake Roxburgh to Butchers Point Track (existing)	Ensure Table 2.6 authorises mountain biking down the full length of the marginal strip down the east side of the Clutha River/Roxburgh Gorge from Graveyard Gully to McKenzies Beach.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.6: Access to Central Otago Drylands Place	1570	20	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson		There are multiple references to variations of the Marginal Strip - Clutha River/Mata-au - are these not all the same thing?	Remove the duplicated provisions.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	1570	21	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	Mahaka Katia Scientific Reserve	MOA supports the cycle track going through the scientific reserve provided it is limited to the extent shown. We consider that any adverse effects can be mitigated by track construction conditions, and this is critical to enable the Wanaka-Cromwell trail to proceed.	Enable cycling within Mahaka Katia Scientific Reserve to the extent shown on the interactive map accompanying the draft review of the Otago CMS.	Reject Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Specific Policy Requirements	Policy 3.3.5	1570	22	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson		There is a distinction between allowing cycling in a conservation area and allowing the construction of tracks and trails in an area. The desirable approach is to allow cycling in the Tables and separately allow for the construction of the tracks and trails using criteria. Policies 3.3.5 and 3.3.6 are necessary and desirable to allow for the construction of cycling tracks and trails.	Retain Policy 3.3.5	Accept
Specific Policy Requirements	Policy 3.3.6	1570	23	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson		There is a distinction between allowing cycling in a conservation area and allowing the construction of tracks and trails in an area. The desirable approach is to allow cycling in the Tables and separately allow for the construction of the tracks and trails using criteria. Policies 3.3.5 and 3.3.6 are necessary and desirable to allow for the construction of cycling tracks and trails.	Retain Policy 3.3.6	Accept
General	general comments	1570	24	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	E-bikes	MOA supports treating independent electric power assisted pedal cycles, without hand throttles, in the same way as mountain bikes and supports combining them in the policies.	Retain the amendments made to combine the approach to mountain bikes and e-bikes in sections 3.3 and 3.4.	Accept
General	general comments	1570	25	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	E-bikes - glossary	E-bikes with hand throttles can be ridden just with the hand throttle and have the potential to roost a bike track (like a motor bike). The definition should be changed to exclude e-bikes with hand throttles. MOA supports the simplicity of using the term 'e-bike' rather than 'electric power-assisted pedal cycle' and seeks that the definition be amended accordingly.	Amend the term and definition of 'electric power-assisted cycle' in the glossary as follows: "Electric power-assisted cycle E-bike: A pedal cycle to which is attached one or more auxiliary electric propulsion motors without a hand throttle, and having a combined maximum power output not exceeding 300 watts."	Accept in part The definition for e-bike has been updated and now reads 'Electric power-assisted pedal cycle (e-bike) - A bicycle to which one or more auxiliary electric propulsion motors are attached having a combined maximum output not exceeding 300 watts, excluding bicycles with a throttle device controlling the power output.'
General	general comments	1570	26	Mountain Bikers of Alexandra Incorporated (MOA)	John Williamson	Cycling - glossary	Amendments to Part Three introduces a definition of 'cycling' in the opening paragraph to 3.3. If 'cycling' is intended to have a definition then this should be included in the Glossary (as opposed to defining it in the text).	Include a definition of 'cycling' in the glossary that encompasses mountain bikes and e-bikes.	Accept Cycling is no longer use but instead, bike tracks and bikes or biking. Access is a for non-motorised bikes. Definitions are now included in the CMS.
General	general comments	1571	1	Federated Mountain Clubs	Jan Finlayson	E-bikes	E-bikes present issues. They are increasingly popular, but as battery power and wattage increase, their speed increases and thus their potential risk to other users can increase (particularly when coupled with their quiet operation). The CMS should provide some controls on them. Another implication is the limitation of battery life and implications for search and rescue where users run out of charge long distances from trail heads. FMC supports the use of e-bikes with a wattage under 300 watts and without a throttle, but the CMS will need to regulate this. This poses a challenge for enforcement. One option is for bike retailers/clubs/others to run a certification scheme whereby compliant bikes are issued a sticker (similar to for events).	Amend CMS to limit the use of E-Bikes as set out in the submission point.	Accept in part The definition of e-bike already states they are pedal assisted and are 300 watts or under. The additional policy is not required. However, the definition has been updated to read 'Electric power-assisted pedal cycle (e-bike) A bicycle to which one or more auxiliary electric propulsion motors are attached having a combined maximum output not exceeding 300 watts, excluding bicycles with a throttle device controlling the power output.'
General	general comments	1571	2	Federated Mountain Clubs	Jan Finlayson	Mapping	FMC is supportive of the vast majority of proposed tracks listed in the Tables in Part 2 and shown on the interactive map online. FMC would like to congratulate DOC on providing an excellent tool for consultation with stakeholders.		Accept Thank you.

General	general comments	1571	3	Federated Mountain Clubs	Jan Finlayson	Funding	It is not clear how the proposed tracks will be funded, maintained and operated. DOC does not have the funding. Much of the amendments hint at the tracks being applied for by organisations under the concession framework, when in fact they could be built under a number of arrangements.	No specific relief sought	Accept in part The changes to the CMS allow track proposals to be considered, this applies to tracks proposed and funded by others, including Bike Clubs and Trusts etc. It also applies to the bike track developed and managed by the Department. Policy 3.3.5 provides direction to the decision makers for new proposals not listed in the CMS. Policy 3.3.6 provides direction to the decision maker for the assessment of proposals listed in the CMS. Policy 3.3.7 provides direction for the decision maker for the construction and maintenance of bike tracks, including those managed by the Department. Policy 3.3.8 provides direction for any limitations that may be necessary to manage the activity. Policy 3.3.9 provides for the activity to be managed.
General	general comments	1571	4	Federated Mountain Clubs	Jan Finlayson		The policy framework as written may risk a substantial privatisation, or exclusion of the recreational public, from the new tracks. The framework provides no direction for how a charging regime will be considered, and how that charging regime is consistent with the underlying land.	No specific relief sought	Reject Public access is to remain full and free. If an application for an exclusive lease was applied for it would be assessed and processed under Part 38 of the Conservation Act 1987. The additional policy is not required.
General	general comments	1571	5	Federated Mountain Clubs	Jan Finlayson	Use of NaPALIS IDs	FMC suggests looking into whether the use of NaPALIS land and parcel IDs, which is an internal DOC system, is consistent with the legal requirements of a CMS to use the actual legal land descriptors from the cadastre.	Look into this issue.	Accept in part The NAPALIS ID's have been removed and the legal name of the public conservation lands and waters details. Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1571	6	Federated Mountain Clubs	Jan Finlayson	Lake Wanaka Circuit East	FMC supports this proposed track - it would be a great asset in providing access to the Albert Burn and other valleys on the west shore of Lake Wanaka.	No specific relief sought	Accept Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1571	7	Federated Mountain Clubs	Jan Finlayson	Lake Hawea Circuit	FMC supports this proposed track - it would improve access to the Hunter Valley.	No specific relief sought	Accept
General	general comments	1571	8	Federated Mountain Clubs	Jan Finlayson	Motatapu Valley Track to Arrowtown	FMC supports this proposed track - it follows a logical route, avoiding conflict with the existing Motatapu Track. Provides an alternative route for bikers from Wanaka to Queenstown away from the traffic of the Crown Range Road.	No specific relief sought	Accept
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1571	9	Federated Mountain Clubs	Jan Finlayson	Mahu Whenua Traverse and Treble Cone Trails	FMC supports DOC not providing for these trails. It is a high alpine environment where the construction of cycle trails would have a major impact on the landscape. It is also mostly not on public conservation land.	Retain position on these trails.	Reject After careful consideration, most proposed trails have been added to the CMS, so a cycle trail in this area can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1571	10	Federated Mountain Clubs	Jan Finlayson	Greenstone to Te Anau bike trail	FMC supports DOC not providing for this trail. The trail would follow the upper Mararoa River Valley, which is swampy by nature. Any trail would require construction similar to a road, with multiple bridges. The development would have a major impact on the existing Mavora Walkway which is also a section of the Te Araroa Trail.	Retain position on these trails.	Reject Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1571	11	Federated Mountain Clubs	Jan Finlayson	Mt Crichton Scenic Reserve	Mt Crichton is a popular trip for walkers and mountaineers. The bike trails proposed as 'epic loop' would have a major impact on the landscape, and the experience of current recreational users. The setting of Lake Isobel would be severely impacted. FMC is opposed to this trail proposal. Mt Crichton is the only relatively undeveloped mountain in the immediate surroundings of Queenstown. Mt Crichton Scenic Reserve should not have cycling enabled upon it.	Remove Mt Crichton Scenic Reserve from Table 2.3	Reject in part Mt Crichton Scenic Reserve has been retained, excluding the Mt Crichton Loop Track. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1571	12	Federated Mountain Clubs	Jan Finlayson	Remarkables Conservation Area	FMC has long been advocating for the establishment of a Remarkables National Park and opposing any expansion of the ski field into Doolans Creek. Proposed trail on the ridgelines at the head of Doolans Creek, and within the boundaries of the proposed Remarkables National Park would have similarly adverse effects. FMC opposes the development of the Ben Cruachan Trail. Remarkables Conservation Area should not have cycling enabled on it.	Remove Remarkables Conservation Area from Table 2.3	Reject in part Remarkables Conservation Area has been retained. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1571	13	Federated Mountain Clubs	Jan Finlayson	Silverpeaks Scenic Reserve	The Dunedin Links trail follows the popular Rocky Ridge from Silver Peak to the Gap in Dunedin's Silverpeaks. This is the number 1 'remote' tramping opportunity in the Silverpeaks and is extremely popular with trampers. The development of this MTB trail should be a no go - there is an over-abundance of existing MTB trails in the Dunedin area and a scarcity of opportunities for remote tramping experiences. The popular tramping track to Green Hill should also be retained as trampers-only track.	Remove Silverpeaks Scenic Reserve from Table 2.7	Accept in part The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.2: Access to Te Papanui, Otago and Hawea Conservation Parks Place	1571	14	Federated Mountain Clubs	Jan Finlayson	Otago Conservation Park	The proposed tracks shown on the map over Mt St Bathans are already popular with both trampers and MTBers in summer, and with ski toasters in winter. MTBers who use the area need to be very fit and well prepared in what is a severe alpine environment. The development of any MTB or bike trails on Mt St Bathans would be an eye-sore on the landscape values and would impact on existing recreational users. Trails could push unprepared MTBers into a risky alpine environment.	No MTB trails should be developed in the alpine regions of Mt St Bathans.	Accept in part Any proposed track would be subject to an assessment under the 3.3 Policies, including landscape and risks.
Places	Table 2.8: Access to Catlins Place	1571	15	Federated Mountain Clubs	Jan Finlayson	Catlins Conservation Park	The development of the Catlins Traverse Cycling trail would require extensive engineering and the formation of a benched, hard surfaced track given the boggy nature of the terrain. The opportunity should not be ruled out, but should not impact on the existing Thisbe Valley Tramping Track over Calliope Saddle to McLenman Hut. It is the only 'remote' tramping experience in the Catlins Conservation Park.	Suggest that the bike track should seek a line that keeps out of Thisbe Stream and away from Calliope Saddle.	Accept in part The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including impacts on other users.

Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1571	16	Federated Mountain Clubs	Jan Finlayson	Maungatika Trail	FMC has some reservations about some of the detail of this track: - Timaru River is a popular tramping route up a narrow river gorge. - Deep Spur Creek is a steep mountain creek surrounded entirely by stee slopes and eroding rock. Any trail up this valley would be subject to frequent damage and erosion. - the proposed trail conflicts with the Te Araroa Trail, and with existing popular tramping routes up Timaru River and to Moonlight and Roses Huts. - the sector of Hawea Conservation Park to the east of Lake Hawea is better suited to limited development of bike trails confined to existing 4WD track or <i>technical low impact routes</i> .	No specific relief sought	Accept After careful consideration Hawea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1571	17	Federated Mountain Clubs	Jan Finlayson	Kidds Bush Loop Trail	FMC opposes the development of Kidds Bush Loop Trail. Kidds Bush is a significant remnant of native beech forest in an area that has lost most of its original vegetation cover. The steep nature of the terrain means that the Kidds Bush Loop Trail would be a benched trail with numerous tight switchbacks. Would have a significant impact on a forest that has already lost much of its original area.	The whole sector of Hawea Conservation Park between Lakes Wanaka and Hawea should not be supported for cycling.	Reject After careful consideration Hawea Conservation Park has been retained in Table 2.2, without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1571	18	Federated Mountain Clubs	Jan Finlayson	Matatahiho Conservation Area	FMC opposes the development of the Matatahiho Trail. Mt Burke Creek holds the only significant patch of native forest left on the Isthmus in Lake Wanaka. Steep nature of the terrain means that any bike trail would need to be a benched trail with multiple switch backs. Would have a significant impact on landscape and forest.	The Matatahiho Conservation Area should not be supported for cycling.	Reject in part Matatahiho Conservation Area has been retained. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.4: Access to Central Otago Uplands Place	1571	19	Federated Mountain Clubs	Jan Finlayson	Pisa Conservation Area	FMC considers that the development of any new bike trails in the Pisa Conservation Area would be inappropriate due to high landscape and ecological values, severe alpine environment, and popularity with a wide range of users. Several of the existing tracks and routes are suitable as they are for fit, competent and well prepared bikers.	No specific relief sought - presumably to not enable any further cycling on this parcel of land.	Reject in part Pisa Conservation Area has been retained. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1571	20	Federated Mountain Clubs	Jan Finlayson	Dublin Bay - Outlet - Albert Town Recreation Reserve	FMC requests that Deans Bank Track is added back in as this is a mountain bike park.	Reinstate Deans Bank Track in the list of cycling tracks on this parcel.	Accept Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. Albert Town Recreation Reserve is included in Table 2.3.
Specific Policy Requirements	3.3. MTB-intro text	1571	21	Federated Mountain Clubs	Jan Finlayson	E-bikes - new policy	Further to other submission points on e-bikes made by FMC, FMC seeks that an additional policy relating to assessing suitable e-bikes for use on public conservation land.	Insert the following new policy into Section 3.3: <i>"E-bikes are to be assessed by independent assessors as compliant (pedal assisted under 300 watts under the conditions of this CMS) and prominently marked with this wattage."</i>	Accept in part The definition of e-bike already states they are pedal assisted and are 300 watts or under. The additional policy is not required. However, the definition has been updated to read <i>Electric power-assisted pedal cycle (e-bike)</i> <i>A bicycle to which one or more auxiliary electric propulsion motors are attached having a combined maximum output not exceeding 300 watts; excluding bicycles with a throttle device controlling the power output."</i>
Specific Policy Requirements	Policy 3.3.7	1571	22	Federated Mountain Clubs	Jan Finlayson		Further to other submission points made by FMC about protecting public access to pcd&w even on tracks constructed by others, FMC seeks that an additional policy is included in Section 3.3, on this matter.	Insert the following new criterion under Policy 3.3.7 <i>"Ensuring full and free public access, ownership, and overall control to and of the track remains with the Crown through the Department of Conservation regardless of any concession, maintenance or funding agreement."</i>	Reject Public access is to remain full and free. If an application for an exclusive lease was applied for it would be assessed and processed under Part 3B of the Conservation Act 1987. The additional policy is not required.
General	general comments	1572	1	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		Seek that specific tracks do not need to be listed individually within the CMS, nor that a statutory amendment is required for further bike trail development for trails which are not listed in the CMS. This is not appropriate and is not in line with DOC's own policies.	Request that parcels are approved for bicycle tracks in general, with no more stipulations than that of a walking track.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	1572	2	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Limitations	Seek that any comments or exclusions that depend on detailed planning or assessment are left out of the CMS. The role of the CMS is not to make these assessments, and they should be made in the detailed planning stage when specific mitigation measures can be considered.	no specific relief sought.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
General	general comments	1572	3	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		Seek that the aspirations of the Queenstown community, which are conveyed through Vision Beyond 2050 are taken into account in the development of the CMS. Submission highlights some key themes relating to: - accessibility for all people; - vision of kaitiaki - more bike trails enable more access to pcd&w so that residents and visitors can grow appreciation of the natural environment and desire to care for and protect it through bicycle based recreation; - active travel being an integral part of an accessible and safe network for all.	No specific relief sought	Accept in part After careful consideration, most proposed areas of pcd&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies. Also see standard response.
General	general comments	1572	4	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		Request that DOC ensures it is doing all it can to deliver its own Destination Management Framework, outcomes and targets by enabling the community bicycle access to all pcd&w throughout the CMS.	No specific relief sought in relation to the draft CMS. Seeking that DOC support and enable cycling.	Accept in part DOC systems, such as DMF are not statutory. They provide direction for how different matters are addressed in statutory planning documents like the CMS. After careful consideration, most proposed areas of pcd&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies. Also see the standard response.

General	general comments	1572	5	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		Alterations should be made to the CMS to ensure that biking and e-biking is treated in the same way as walking and that cycle trails are no more onerous to develop than a walking trail.	No specific relief sought.	Accept in part Biking and e-biking are being treated the same in this partial review and are now referred to as non-motorised bikes. A new definition has been added to the CMS for non-motorised bikes. When walking tracks are developed or infrastructure improved the same considerations detailed in the CMS are undertaken, including the specialist reports and assessments.
General	general comments	1572	6	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Statutory review process	Request that DOC remove the requirement to undertake a statutory review process to make alterations to the CMS.	No specific relief sought.	Reject See standard response.
General	general comments	1572	7	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		Support all tracks added to the CMS. Inclusion of all these trails aligns with the purpose of DOC. Will enable our community and visitors to engage with natural environment and become greater stewards of our land through cycling recreation.	Retain all trails which have been added to the CMS as part of this review.	Accept in part After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1572	8	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		Oppose the removal of any cycling tracks from the CMS e.g. the Peninsula section of the Moke Lake Track.	Unless the removal of specific track listings is required in order to grant overarching approval for bike tracks in that area, retain all tracks in the CMS.	Reject The Peninsula section of the Moke Lake Track is not suitable for shared use due to health and safety risks.
General	general comments	1572	9	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		Oppose the exclusion of any tracks that were put forward but have not been provided for in the CMS. Any specific issues with a particular track can be worked through at the detailed planning phase.	Oppose that any proposed tracks are opposed within the CMS.	Accept After careful consideration, most proposed areas of p&f&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	1572	10	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		This policy (and others) makes it more onerous to create a cycling track than a walking track (under Policy 3.2.3). The amendments have not been sought by the cycling community and are not justified. There is not appropriate evidence that the current approach requires changing – less restrictions and a more agile policy approach is required.	Oppose any amendment to Policy 3.3.4 that makes it more onerous to create a cycling trail than a walking trail.	Reject See standard response. Policy 3.3.4 (now 3.3.5) provides direction to the decision makers for new p&f&w not listed in the CMS. Policy 3.3.5 (now 3.3.6) provides direction to the decision maker for the assessment of proposals listed in the CMS. Policy 3.3.6 (now 3.3.7) provides direction for the decision maker for the construction and maintenance of bike tracks, including those managed by the Department. When walking tracks are developed or infrastructure improved the same considerations detailed in the CMS are undertaken, including the specialist reports and assessments.
General	general comments	1572	11	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Limitations	Strongly oppose wording in some of the tables that exclude tracks from Beech Forest. This approach of complete exclusion is absolutely unnecessary and undermines DOC own concept of developing stewardship and love of our native forest.	These exclusions should be removed and replaced with more positive outcome driven sentences such as 'should ensure beech forest is respected'	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	12	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Mt Crichton Scenic Reserve	Do not agree with the wording 'must avoid beech forest damage'.	Wording should be replaced with wording such as 'should ensure beech forest is respected' or 'should be developed in a way which aligns with desired outcomes.'	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. Mt Crichton Scenic Reserve is included and the limitation around the beech forest is removed and will be addressed by the policies in section 3.3. However bikes are not permitted on the Crichton Loop Track due to safety concerns. Signage is in place and is on the DOC website.
General	general comments	1572	13	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Limitations	Oppose wording such as 'must avoid ridgelines and prominent landscape features'. This wording could be used to unnecessarily inhibit track development. Too much interpretation as to what a prominent landscape is. Specific issues can be addressed at detailed planning stage.	These exclusions should be removed and replaced with more positive outcome driven sentences such as 'should be developed on ridgelines in a respectful manner'	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	14	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Ben Lomond Scenic Reserve	There are existing trails in this parcel which are missing from the list (e.g. Fernhill Loop Trail and Salmon Run). Request that no specific trails are listed.	Change wording to 'current and future proposed tracks', or remove limitation entirely.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	15	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Mt Crichton Scenic Reserve	Oppose listing of specific tracks. Phoenix is not a climb, and is in the Wilson Bay Recreation Reserve	Change wording to 'current and future proposed tracks', or remove limitation entirely.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	16	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Lower Shotover Conservation Area	Oppose removal of this parcel from Table 2.3	Reinstate this parcel in Table 2.3	Accept Lower Shotover Conservation Area has been retained and is now listed under its proper name Conservation Area - Lower Shotover.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	17	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	McChesney's Conservation Area	Oppose listing of specific tracks.	Change wording to 'current and future proposed tracks', or remove limitation entirely.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	18	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Marginal Strip - Arrow River	Request removing limitations entirely. This area is not particularly sensitive to trails and additional access will support weed and predator control.	Remove limitations from this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	19	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Marginal Strip - Bush Creek	Request removing limitations entirely. This area is not particularly sensitive to trails and additional access will support weed and predator control.	Remove limitations from this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1572	20	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Wilson Bay Recreation Reserve	Request removing limitations entirely. This area is a recreation reserve and abuts other scenic reserves with no limitations.	Remove limitations from this parcel.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	1572	21	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway		A link from the top of Lake Wakatipu through the Mavora Lakes via the Greenstone should be included as it forms an important connection between places. Potential concerns can be worked through at the detailed design stage.	Oppose the exclusion of this link from the CMS.	Accept Mavora Lakes (and part of the Ngāi Tahu Lessobad Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area - Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautū Place	1572	22	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	North Motatapu Conservation Area	There is potential to construct a world class alpine trail in this area linking Treble Cone to Macetown. These are limited opportunities in NZ.	Oppose the exclusion of this parcel from the CMS	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
General	general comments	1572	23	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Terms	different references throughout the document to 'mountain biking', 'cycling' and 'electric power assisted cycle' etc. This can be confusing.	Request that cycling, mountain biking and e-biking are treated equally.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes, which includes e-bikes and definitions have been added to the Glossary.
General	general comments	1572	24	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Positive effects	There is a lack of acknowledgement throughout the CMS to positive effects, with a focus on adverse effects.	Ensure that in all places where potential negative impacts are mentioned, these are equally balanced with positive impacts.	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	3.3. MTB-intro text	1572	25	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	E-bikes	Strongly support the addition of e-bikes into Section 3.3 and that they are treated in the same way as a bike.	Support e-bikes being included in Section 3.3.	Accept
General	general comments	1572	26	Queenstown Mountain Bike Club (QMTBC)	Christopher Conway	Marginal Strips	All marginal strips should be considered and assessed as one, and not broken into individual parcels for assessment.	Approve all marginal strips for bike and e-bike tracks within the CMS.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Specific Policy Requirements	Policy 3.3.4	1633	1	Transpower NZ Ltd		Criterion (b)	Development in close proximity to the National Grid can pose risks to the National Grid e.g. by earthworks. Transpower acknowledges that the proposed cycle trail locations are to be confirmed, and that resource consents would be required to construct them. Transpower seeks policy wording to ensure that any potential adverse effects are avoided, remedied or mitigated, and are considered in terms of construction and ongoing operation. Transpower seeks policy wording in the CMS to ensure that potential safety risks are taken into account via early and ongoing consultation with Transpower.	Amend Policy 3.3.4 (b) as follows: "undertake consultation with cycling clubs, ... other interested parties (including Transpower New Zealand Limited) and the public;	Accept in part Policy 3.3.4 (now 3.3.5) is for the consideration of bike tracks on pCl&w where the pCl&w is not listed in the CMS and the need for a partial review to include the pCl&w. The proposed changes are not required as Transpower New Zealand Limited is covered by 'other interested parties'. The partial review would be subject to public consultation.
Specific Policy Requirements	Policy 3.3.4	1633	2	Transpower NZ Ltd		Criterion (c)	Development in close proximity to the National Grid can pose risks to the National Grid e.g. by earthworks. Transpower acknowledges that the proposed cycle trail locations are to be confirmed, and that resource consents would be required to construct them. Transpower seeks policy wording to ensure that any potential adverse effects are avoided, remedied or mitigated, and are considered in terms of construction and ongoing operation. Transpower seeks policy wording in the CMS to ensure that potential safety risks are taken into account via early and ongoing consultation with Transpower.	Change wording to 'current and future proposed tracks', or remove limitation entirely.	Reject Policy 3.3.4 (now 3.3.5) is for the consideration of bike tracks on pCl&w where the pCl&w is not listed in the CMS and the need for a partial review to include the pCl&w. The proposed changes are not required.
Specific Policy Requirements	Policy 3.3.5	1633	3	Transpower NZ Ltd		Criterion (a)	Development in close proximity to the National Grid can pose risks to the National Grid e.g. by earthworks. Transpower acknowledges that the proposed cycle trail locations are to be confirmed, and that resource consents would be required to construct them. Transpower seeks policy wording to ensure that any potential adverse effects are avoided, remedied or mitigated, and are considered in terms of construction and ongoing operation. Transpower seeks policy wording in the CMS to ensure that potential safety risks are taken into account via early and ongoing consultation with Transpower.	Add new sub-clause to Policy 3.3.5 (a) as follows: "to infrastructure, including the National Grid"	Accept in part Policy 3.3.5 a) (now 3.3.6 a)) is for consideration of the adverse effects of biking on natural, heritage, cultural and recreational values. However 3.3.6 (h) now reads if consultation with interested parties, concessionaires, local authorities, adjacent landowners and affected parties is required.
Specific Policy Requirements	Policy 3.3.5	1633	4	Transpower NZ Ltd		Criterion (g)	Development in close proximity to the National Grid can pose risks to the National Grid e.g. by earthworks. Transpower acknowledges that the proposed cycle trail locations are to be confirmed, and that resource consents would be required to construct them. Transpower seeks policy wording to ensure that any potential adverse effects are avoided, remedied or mitigated, and are considered in terms of construction and ongoing operation.	Amend Policy 3.3.5(g) as follows: "If consultation with interest groups, infrastructure providers (including Transpower New Zealand Limited), local authorities and adjacent landowners is required."	Accept in part Policy 3.3.5 a) (now 3.3.6 a)) is for consideration of the adverse effects of biking on natural, heritage, cultural and recreational values. However 3.3.6 (h) now reads if consultation with interested parties, concessionaires, local authorities, adjacent landowners and affected parties is required.

Specific Policy Requirements	Policy 3.3.6	1633	5	Transpower NZ Ltd			Transpower supports the wording of this policy that requires authorisations to be granted only where certain standards are met, provided that it achieves its relief on Policy 3.3.5.	Retain wording (conditional support)	Accept
General	general comments	1634	1		Geoff Kernick		Support all tracks. Having a finite list of tracks in the CMS limits the possible locations of future tracks. Could mean time is spent assessing a listed track when there is a better option that is not listed.	No specific relief sought.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. Also see standard response.
Specific Policy Requirements	Policy 3.3.4	1634	2		Geoff Kernick		Oppose all amendments to Policy 3.3.4. The policy sets a high bar for any cycle track and is more rigorous than that for a walking track or authorised utility. The changes have not been sought by the cycling community and are not justified. No evidence that the policy is not fit for purpose.	No specific relief sought	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1634	3		Geoff Kernick	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	1652	1	Te Anau Cycling Incorporated	James Reardon		I do not support the blanket permitting of trail development on p&f&w without a sensitive and informed assessment of trail standards to ensure that the riding experience justifies the impacts and that the impacts are minimised. Measures should include: - minimising impacts by building the smallest practicable footprint, preference for hand built single track. Concerned that there is a conflict here with DOC's trail standards. - boardwalk type structures should be used where sensitive vegetation or wetlands are present. - New trails should be designed by skilled trail designers and builders. - do not support further development of 'road-like' trails (wider than 1.2m).	No specific relief sought.	Accept in part This is not a blanket permitting of trail development. Including the proposed trails in the CMS allows for the consideration and necessary assessments to address the concerns you have raised. The changes made to the 3.3 policies allows these considerations to be undertaken.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikiri a Rākaiahautō Place	1652	2	Te Anau Cycling Incorporated	James Reardon		A link from the top of Lake Wakatipu through the Mavora Lakes via the Greenstone should be included as it forms an important connection between places. Potential concerns can be worked through at the detailed design stage.	Oppose the exclusion of this link from the CMS.	Accept Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Specific Policy Requirements	3.3. MTB-intro text	1652	3	Te Anau Cycling Incorporated	James Reardon	E-Bikes	Support the approach to managing e-bikes and mountain bikes together.	Support the addition of e-bikes to section 3.3.	Accept
Specific Policy Requirements	3.3. MTB-intro text	1652	4	Te Anau Cycling Incorporated	James Reardon	Terms	different references throughout the document to 'mountain biking', 'cycling' and 'electric power assisted cycle' etc. This can be confusing.	Request that cycling, mountain biking and e-biking are treated collectively.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes, which includes e-bikes and definitions have been added to the Glossary.
Specific Policy Requirements	3.3. MTB-intro text	1652	5	Te Anau Cycling Incorporated	James Reardon		Caution is required when considering downhill cycling.	Replace with 'Should consider this and ways to mitigate risk, such as one-way trails, or signage'.	Reject On p&f&w caution is required when considering high speed and high impact activity. The proposed change is not required to the descriptive text.
General	general comments	1653	1	Mount Creighton Station Limited	Gerald Fitzgerald	Mount Creighton Station	Parts of the Otago CMS identify areas on Mount Creighton Station for bike access. This is opposed. When it was agreed to allow public access through parts of Mount Creighton Station, it was agreed that bikes would not be permitted to access any part of Mount Creighton Station. This remains Mount Creighton Station's position. Allowing biking could result in user conflict. The identification of various parcels of private land on Mount Creighton as being made available to bikes is objectionable and contrary to the rule of law.	Delete from the CMS any proposals for bike access to any land forming part of Mount Creighton Station or any land in which Mount Creighton Station has a legal interest (including the land in the Moonlight Gorge).	Reject Conservation Area - Mt Creighton has been included so opportunities can be considered in the future.
General	general comments	1654	1	Queenstown Lakes District Council	Jim Boulton		Support in principle on behalf of Queenstown Lakes District Council for the formal submission of the Queenstown Trails Trust in relation to DOC's partial review of the CMS. The proposed trails will form part of a critical network which supports the enabling of active travel, economic recovery, and the Council's pursuit of its Climate Change Action Plan.	That DOC work with the community to achieve outcomes that will future proof the health and wellbeing of residents and visitors alike.	Noted See standard response.
General	general comments	1655	1		Joe Sherriff		I appreciate the huge amount of work that DOC staff has undertaken in producing this document. I endorse the submission made by Mountain Bikers of Alexandra.	Accept the decisions sought by Mountain Bikers of Alexandra.	Noted and thank you.
General	general comments	1655	2		Joe Sherriff	Mapping	The interactive map shows areas in green that indicate that the CMS recommendation is supported, and purple lines showing proposed tracks, some of which are supported, and others left blank.	Give a clear indication that cycling is allowed and tracks may be built under the terms of Section 3 of the CMS in all of the areas shown in green on the interactive map.	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1655	3		Joe Sherriff	Maungatika Trail	I strongly support the development of the Maungatika Trail. It will be an outstanding addition to Hawea Conservation Park. It will be used by both trampers and cyclists and will enable effective pest control (access to trap lines by e-bike).	Support the Maungatika Trail in the CMS.	Accept After careful consideration Hawea Conservation Park has been retained in Table 2.2, without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	1655	4		Joe Sherriff	Mahaka Katia Scientific Reserve	Given that the incursions into the reserve are across stream beds and the scientific values of the reserve lie on the adjacent raised river terrace, the track will have no adverse effects on the reserve.	Include the sections of trail in the Mahaka Katia Scientific reserve as shown on the interactive map.	Reject Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikiri a Rākaiahautō Place	1655	5		Joe Sherriff	North Motatapu Conservation Area	Cycling should be supported in this area. The CMS should enable cycling to be considered as acceptable in this parcel at some future date.	Support the inclusion of the North Motatapu Conservation Area in the CMS	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
Places	Table 2.8: Access to Catlins Place	1655	6		Joe Sherriff		The CMS should provide for a long-distance track through the Catlins and enable assessment of it to be done under the terms of Section 3. I strongly oppose the exclusion of cycling from the Catlins Place.	No relief specified.	Reject After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.

Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautō Place	1655	7		Joe Sherriff	Greenstone Mavora Lakes	The CMS should allow consideration of mountain biking through this area.	No relief specified.	Accept Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
General	general comments	1662	1	Walking Access Commission	Ric Cullinane		Support the inclusion of biking in the additional places.	Retain all tracks indicated on maps and inclusions.	Accept After careful consideration, most proposed areas of pōi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1662	2	Walking Access Commission	Ric Cullinane		The Walking Access Commission does not support the rigid listing of tracks in the CMS. This approach does not provide for agility and flexibility.	Replace the tables with the following statement: "Should allow cycling and may allow guided cycling or events on all tracks, trails and named roads including those yet to be identified and constructed providing: (i) adverse effects of the activity on natural, historic and cultural values can be avoided, remedied or mitigated, and (ii) is consistent with the desired outcome and policies for the Place.	Reject See standard response.
General	general comments	1662	3	Walking Access Commission	Ric Cullinane	Marginal strips	Include all marginal strips in the CMS. One of the purposes in Section 24(c) of the Conservation Act is to enable public access and public recreational use to/of any adjacent watercourses or bodies of water.	Reword the policies and tables to include all marginal strips.	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1662	4	Walking Access Commission	Ric Cullinane		Provision should be made for trails on land acquired by DOC during the life of the CMS and not yet known, e.g. through the Tenure review process, Crown Pastoral Lease renewal or other disposition of Crown Land.	No specific relief sought.	Reject in part The CMS can only consider land that is pōi&w at the time the CMS is reviewed. It cannot predetermine the outcome of the tenure review process.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1662	5	Walking Access Commission	Ric Cullinane	Kidds Bush Loop Trail	We support the inclusion of this trail. Kidds Bush is a popular camping and recreation destination. Biking opportunities in the Hawea Conservation Park and Hawea Conservation Area will complement the park's natural values.	No specific relief sought.	Accept Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1662	6	Walking Access Commission	Ric Cullinane	Maungatika Trail	We support the inclusion of this trail. Deer Spur Creek Marginal Strip and Timaru River Marginal Strip provide links to the proposed Maungatika Trail.	No specific relief sought.	Accept After careful consideration Hawea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1662	7	Walking Access Commission	Ric Cullinane	Kawarau River Marginal Strip and adjacent conservation areas	This parcel facilitates a crucial link in the Central Otago Queenstown trails linking project - without it there will be no link. The government-supported linking project will considerably enhance existing local but disconnected cycle trails into a connected regional network.	Seek reinstatement of Kawarau River Marginal Strip and adjacent conservation areas	Accept in part This entry was not deleted, but rather moved to its correct name. However, Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.4: Access to Central Otago Uplands Place	1662	8	Walking Access Commission	Ric Cullinane	Conservation Area - Lepidium Kawarau Habitat	Seek inclusion of this parcel in the CMS	Seek inclusion of this parcel in the CMS	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	1662	9	Walking Access Commission	Ric Cullinane	Marginal Strip - Bush Creek	The small waterway is prone to occasional flooding which from time to time erodes the existing track. Both sides of the creek should be included to provide more resilient future options and flexibility.	Amend the entry to include both sites of the marginal strip.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Specific Policy Requirements	3.3. MTB-intro text	1662	10	Walking Access Commission	Ric Cullinane	Benefits of new biking trails.	The draft does not acknowledge the vision, hard work and service provided by the many community trail groups. These groups are the lifeblood of recreation (and ecological enhancement) in Aotearoa and provide services that statutory agencies cannot or will not provide. The draft does not acknowledge the benefits that biking infrastructure provides to walkers.	Amend to include an acknowledgement of the substantial benefit that new biking trails provide.	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.4	1662	11	Walking Access Commission	Ric Cullinane	Criterion (a)	We oppose this clause - it is redundant.	Delete criterion (a) requiring a statutory review process.	Reject See standard response.
Specific Policy Requirements	3.3. MTB-intro text	1662	12	Walking Access Commission	Ric Cullinane		We oppose policies 3.3.5 - 3.3.7. Assessment criteria are provided in 3.3.4 (c)(i). Specifics are more practically provided for within consents.	No specific relief sought.	Reject Policy 3.3.4 provides direction to the decision makers for new proposals not listed in the CMS. Policy 3.3.5 provides direction to the decision maker for the assessment of proposals listed in the CMS. Policy 3.3.6 provides direction for the decision maker for the construction and maintenance of bike tracks, including those managed by the Department. Policy 3.3.7 provides direction for any limitations that may be necessary to manage the activity. Policy 3.3.8 provides for the activity to be monitored.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākahautō Place	1662	13	Walking Access Commission	Ric Cullinane	Greenstone	Provided that Aukaha and rūnanga support this trail, the Commission supports inclusion of this trail.	Include this trail.	Accept Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.

Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1662	14	Walking Access Commission	Ric Cullinane	CR - Leaseback - Ngāi Tahu Lease back Area (2892717)	Provided that Aukaha and rūnanga support this trail, the Commission supports inclusion of this trail.	Include this trail.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1662	15	Walking Access Commission	Ric Cullinane	Conservation Area - Mavora Lakes (Manawapōpōre/Hikuraki)	This trail will provide significant cross regional enhancement to the bike trail network.	Include this trail.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.8 Catlins/Te Ākau Tai Toka Place	1662	16	Walking Access Commission	Ric Cullinane		The draft states that the parcels listed are in extremely close proximity to the coast and are not practical to establish cycle tracks on. Providing the proposed trails are consistent with the purpose for which the pCi&w exists and desired outcomes and policies for the place, the Commission supports inclusion of all areas listed.	Include these areas.	Reject After careful consideration, most of the areas of pCi&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pCi&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1663	1		Samantha Marsh	Kidds Bush Loop Trail	I support this trail. It will open up unique recreational opportunity to connect with Kā Tiritiri o Te Moana.		Accept Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1663	2		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Table	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Policy 2.2.6	1663	3		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Policy	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1663	4		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Table	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Policy 2.3.2	1663	5		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Policy	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.4: Access to Central Otago Uplands Place	1663	6		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Table	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Policy 2.4.5	1663	7		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Policy	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.5: Access to Old Man Range/Kopuwai, Old Woman Range, and Garvie Mountains Place	1663	8		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Table	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Policy 2.5.6	1663	9		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Policy	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.6: Access to Central Otago Drylands Place	1663	10		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Table	Accept After careful consideration, most proposed areas of pCi&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.

Places	Policy 2.6.10	1663	11		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Policy	Accept After careful consideration, most proposed areas of pōtūw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1663	12		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Table	Accept After careful consideration, most proposed areas of pōtūw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Policy 2.7.13	1663	13		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Policy	Accept After careful consideration, most proposed areas of pōtūw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Table 2.8: Access to Catlins Place	1663	14		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Table	Accept After careful consideration, most proposed areas of pōtūw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Policy 2.8.7	1663	15		Samantha Marsh		I support the proposed access for cycles on public conservation lands and waters in this place. Cycling increases accessibility to the wilderness for people of all ages and abilities. The proposed trails provide opportunities for our community to connect with pathways and connection of travelling Ki uta ki tai. Cycle trails also open up access for community groups to expand their predator trapping lines and corridors.	Retain Policy	Accept After careful consideration, most proposed areas of pōtūw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	1663	16		Samantha Marsh	Mahaka Katia Scientific Reserve	I support the Wanaka Link Trail. It is important to connect communities and build stewardship for the 'in between places'. I would consider building a boardwalk in this high value ecological area. It could be a great opportunity to encourage interpretation for threatened species and help promote their care and value to the larger community.	Include the Wanaka Link Trail in the Mahaka Katia Scientific Reserve with conditions to protect the threatened ecosystems.	Reject Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1663	17		Samantha Marsh	Maungatika Trail	I support this trail. It will open up unique recreational opportunity to connect with Kā Tiritiri o Te Moana.	No relief specified	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Specific Policy Requirements	3.3. MTB-intro text	1663	18		Samantha Marsh	E-bikes	Support the section being inclusive of e-bikes. Enables accessibility by differently abled users.	No relief specified	Accept
Specific Policy Requirements	3.3. MTB-intro text	1663	19		Samantha Marsh		No connection in the text currently about the recreational value benefitting the conservation value.	Amend to include the conservation values that are enhanced by recreational opportunity.	Accept in part The benefits of recreational and conservation values are in other parts of the CMS not under review. The positive effects of cycling opportunities are acknowledged in the descriptive text at the start of Section 3.3.
General	general comments	1664	1	Generation Zero	Jeff Gannaway		Generation Zero strongly supports the CMS review. Especially support the proposed changes within the Eastern Otago and Lowlands/Maukaatua Place. Allowing new cycle tracks and trails to be constructed on conservation land will promote a number of positive outcomes (health, wellbeing, promoting modal shift etc.).	No relief specified.	Accept After careful consideration, most proposed areas of pōtūw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1664	1	Generation Zero	Jeff Gannaway		The criteria DOC has developed for evaluating the appropriateness of new cycle trails appears to be thorough, and we support it.	No relief specified.	Accept
Specific Policy Requirements	Policy 3.3.5	1665	1		Tarn Pilkington		Assessments of the listed criteria should not be discretionary. The use of 'should' is defined in the CMS on page 12 as meaning a strong expectation of outcome.	Replace references to 'should' with 'will' in Policy 3.3.5.	Reject in part The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 11(i) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.2, and subject to Policies 3.2.1-3.2.12 and 3.3.1- 3.3.11 in Part Three.' See standard response.
General	general comments	1672	1	Mountain Biking Otago	Hamish Seaton		Oppose listing all tracks in the CMS. Why not simply list the conservation areas in their entirety and leave it at that?	No relief specified.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	1672	2	Mountain Biking Otago	Hamish Seaton	Proposed tracks	Many parcels are included without being track-specific. We presume this leaves open the option to develop tracks in these areas. Some conservation areas are listed as allowing 'proposed tracks' but there is no detail to show where these are. Does the track information on the map viewer form part of the CMS? If it doesn't, we don't have any way of determining which are proposed tracks, and which are not.	No relief specified.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	1672	3	Mountain Biking Otago	Hamish Seaton		Support all tracks listed in the CMS, included those tagged for discussion.	No relief specified.	Accept After careful consideration, most proposed areas of pōtūw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.

Specific Policy Requirements	Policy 3.3.4	1672	4	Mountain Biking Otago	Hamish Seaton		Oppose all amendments to Policy 3.3.4. They set a high bar for cycle tracks and much higher than for walking tracks or authorised utilities. Amendments have not been sought by the cycling community, are unjustified, and no evidence that the current policy is not fit for purpose.	No relief specified.	Reject See standard response. The criteria in Policy 3.3.5 (now 3.3.6) have been strengthened to allow the proposed bike tracks to be added to the CMS and the consideration and assessment to be undertaken later. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.4	1672	5	Mountain Biking Otago	Hamish Seaton	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	1672	6	Mountain Biking Otago	Hamish Seaton	Use of section 53(2) of the Conservation Act	Support DOC and the Director General using its powers under Section 53(2) of the Conservation Act 1987 and the definition of an 'Authorised Utility' and Policy 3.2.3 to give approval to the cycle trails currently funded and designed in Otago in the same way they have done for the Bennett's Bluff Carpark	No relief specified	Reject See standard response.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	7	Mountain Biking Otago	Hamish Seaton	Tunnel Beach Recreation Reserve	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	8	Mountain Biking Otago	Hamish Seaton	Marginal Strip - Tunnel Beach	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	9	Mountain Biking Otago	Hamish Seaton	Boulder Beach/Highdill Block Conservation Area	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	10	Mountain Biking Otago	Hamish Seaton	Boulder Beach / WWF Block Conservation Area	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	11	Mountain Biking Otago	Hamish Seaton	Sandfly Bay Conservation Area	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	12	Mountain Biking Otago	Hamish Seaton	Sandymount Recreation Reserve	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	13	Mountain Biking Otago	Hamish Seaton	Silverpeaks Scenic Reserve	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	14	Mountain Biking Otago	Hamish Seaton	Careys Creek Conservation Area	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	15	Mountain Biking Otago	Hamish Seaton	Burns Park Scenic Reserve	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	16	Mountain Biking Otago	Hamish Seaton	Mount Cargill Scenic Reserve	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Places	Table 2.7: Access to Eastern Otago and Lowlands Place	1672	17	Mountain Biking Otago	Hamish Seaton	Conservation Area - Mt Cargill Scenic Reserve	Support the inclusion/retention of this parcel in the CMS	Retain parcel in the CMS	Accept
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1672	18	Mountain Biking Otago	Hamish Seaton	Conservation Area - Greenstone	Oppose the proposal to exclude mountain biking and e-biking from this parcel.	Include this parcel in the CMS	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1672	19	Mountain Biking Otago	Hamish Seaton	Kidds Bush Loop Trail	Support the proposal for the Kidds Bush Loop Trail	Provide for this trail in the CMS	Accept Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1672	20	Mountain Biking Otago	Hamish Seaton	Maungatika Trail	Support the proposal for the Maungatika Trail	Provide for this trail in the CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	1674	1	Otago Regional Council	Richard Saunders		ORC supports the Partial Review in principle as it will improve assisting the implementation of the Regional Land Transport Plan policies for Otago and supports a modal shift required in transport. ORC recognises the DCC submission on the CMS and its support for the changes as they relate to its jurisdiction.	No relief specified.	Noted
Specific Policy Requirements	Policy 3.3.5	1674	2	Otago Regional Council	Richard Saunders	Criterion (c)	ORC broadly supports this criterion which requires that consideration is given to the need for any specialist reporting on risk and natural hazards.	This criterion could be improved by requiring a hazard assessment to always be required for new trails and tracks.	Accept in part A hazard assessment may not always be necessary particularly if it a small joining trail. The other criteria will help determine if the risks and natural hazard assessment is required.
General	general comments	1676	1	Te Anau Cycling Incorporated	Vaughn Filmer		I do not support the blanket permitting of trail development on pūāhau without a sensitive and informed assessment of trail standards to ensure that the riding experience justifies the impacts and that the impacts are minimised. Measures should include: - minimising impacts by building the smallest practicable footprint, preference for hand built single track. Concerned that there is a conflict here with DOC's trail standards. - boardwalk type structures should be used where sensitive vegetation or wetlands are present. - New trails should be designed by skilled trail designers and builders. - do not support further development of 'road-like' trails (wider than 1.2m).	No specific relief sought.	Accept in part This is not a blanket permitting of track development. Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1676	2	Te Anau Cycling Incorporated	Vaughn Filmer		A link from the top of Lake Wakatipu through the Mavora Lakes via the Greenstone should be included as it forms an important connection between places. Potential concerns can be worked through at the detailed design stage.	Oppose the exclusion of this link from the CMS.	Accept Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.

Specific Policy Requirements	3.3. MTB-intro text	1676	3	Te Anau Cycling Incorporated	Vaughn Filmer	E-Bikes	Support the approach to managing e-bikes and mountain bikes together.	Support the addition of e-bikes to section 3.3.	Accept
Specific Policy Requirements	3.3. MTB-intro text	1676	4	Te Anau Cycling Incorporated	Vaughn Filmer	Terms	different references throughout the document to 'mountain biking', 'cycling' and 'electric power assisted cycle' etc. This can be confusing.	Request that cycling, mountain biking and e-biking are treated collectively.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes which includes e-bikes and definitions have been added to the Glossary.
Specific Policy Requirements	3.3. MTB-intro text	1676	5	Te Anau Cycling Incorporated	Vaughn Filmer		Caution is required when considering downhill cycling.	Replace with 'Should consider this and ways to mitigate risk, such as one-way trails, or signage'.	Reject On pci&w caution is required when considering high speed and high impact activity. The proposed change is not related to the descriptive text.
Specific Policy Requirements	Policy 3.3.5	1682	1		Ken and Rezija Gousmett		The assessment of the listed criteria in this policy should be mandatory, not discretionary.	Amend policy 3.3.5 to replace 'should' with 'will'	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and are used in decision making policies particularly around authorisations, such as guided biking. Should policies have a strong expectation of outcome. A 'may' policy has more discretion, particularly in ensuring consistency with the Part Two Tables. The Policy will remain 'Should allow'. This policy is not about the consideration of bike trails that is covered under Policy 3.3.6.
General	general comments	1698	1	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple	ONL/ONF	The Society's members are concerned that if unchecked, insensitive development in Arthurs Point will not only ruin the outstanding landscape and compromise the Shotover River (an outstanding natural feature) but will severely compound the problems we already see with our over-stretched local transport network and infrastructure.	Support policies that give protection to the ONL and ONF in the vicinity of Arthurs Point, oppose policies that do not give protections to the ONL and ONF in the vicinity of Arthurs Point	Accept in part ONL and ONF matters are considered under the RMA and district plans. Trails proposed to go through these ONL and ONF will need a resource consent (including if on pci&w). The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1698	3	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple	Arthurs Point Gorge Scenic Reserve	We oppose 'automatic' inclusion of Table 2.3 areas in the vicinity of Arthurs Point that have not been fully assessed under Policy 3.3.5.	No specific relief sought, but presumably either delete this parcel from Table 2.3; or provide evidence that it has been assessed against Policy 3.3.5.	Reject in part The purpose of inclusion in the CMS is so the trails can be considered - not an automatic approval. If they are not included, they cannot be considered. Any proposed trail would be subject to the assessment requirements detailed in the 3.3 Policies and any necessary resource consents.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1698	4	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple	Conservation Area - Big Beach/Shotover River	We oppose 'automatic' inclusion of Table 2.3 areas in the vicinity of Arthurs Point that have not been fully assessed under Policy 3.3.5.	No specific relief sought, but presumably either delete this parcel from Table 2.3; or provide evidence that it has been assessed against Policy 3.3.5.	Reject in part The purpose of inclusion in the CMS is so the trails can be considered - not an automatic approval. If they are not included, they cannot be considered. Any proposed trail would be subject to the assessment requirements detailed in the 3.3 Policies and any necessary resource consents.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1698	5	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple	Marginal Strip - Shotover River	We oppose 'automatic' inclusion of Table 2.3 areas in the vicinity of Arthurs Point that have not been fully assessed under Policy 3.3.5.	No specific relief sought, but presumably either delete this parcel from Table 2.3; or provide evidence that it has been assessed against Policy 3.3.5.	Reject in part The purpose of inclusion in the CMS is so the trails can be considered - not an automatic approval. If they are not included, they cannot be considered. Any proposed trail would be subject to the assessment requirements detailed in the 3.3 Policies and any necessary resource consents.
General	general comments	1698	6	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple	ONL/ONF	There should be an identification at the table level of ONL and ONF land that is sensitive and requiring further assessment.	Sensitive ONL and ONF land should be designated as requiring favourable assessment under Policy 3.3.5 (and other relevant policies).	Accept in part ONL and ONF matters are considered under the RMA and district plans. Trails proposed to go through these ONL and ONF will need a resource consent (including if on pci&w). The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Specific Policy Requirements	Policy 3.3.1	1698	7	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple		We support new tracks and trails in the areas identified in Table 2.3 provided that all new and proposed trails and tracks (that are to be developed or further developed) are subject to favourable assessment under Policy 3.3.5.	Amend Policy 3.3.1 to include a third category [criterion?] that requires favourable assessment prior to any development of the 'tracks, trails and named roads or other areas'.	Accept in part The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Specific Policy Requirements	Policy 3.3.5	1698	8	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple			Amend Policy 3.3.5 as follows: "Should Must assess the following..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. Must is not provided for in the Conservation General Policy. A 'may' policy would allow for discretion, particularly in applying the 3.3 policies. The Policy will remain 'Should allow'.
Specific Policy Requirements	Policy 3.3.5	1698	9	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple	Criterion (d)	Persons affected by works should be involved in the consenting process as affected parties.	Amend Policy 3.3.5 to require that persons affected by works are involved in the consenting process and notified as affected parties.	Accept in part Policy 3.3.5 already includes 'if consultation is required' so no additional change is required. Many of your concerns will be addressed through the RMA consent process.
Specific Policy Requirements	Policy 3.3.8	1698	10	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple			Amend Policy 3.3.8 as follows: "Must monitor the effects of mountain bike..."	Reject This policy provides direction for DOC in monitoring the activity. It is not providing decision making direction for an authorisation therefore the changes suggested is not necessary.
Specific Policy Requirements	Policy 3.3.9	1698	11	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple			Amend Policy 3.3.9 as follows: "Must review mountain bike and e-bike use on tracks..."	Reject This policy provides direction for DOC in reviewing the findings of the monitoring of effects. It is not providing decision making direction for an authorisation therefore the changes suggested is not necessary.
General	general comments	1698	12	Arthurs Point Outstanding Natural Landscape Society Inc.	Matthew Semple		All policy assessments and decisions should be visible to the public.	All policy assessments and decisions should be visible to the public and subject to public scrutiny	Accept in part This review process is the opportunity for the public to have their say over the first stages of the proposed tracks and trails and the proposed changes to the CMS. Policy 3.3.6 also now includes a requirement for public notification if required. The criteria detailed in the policies along with public interest and the Otago Conservation Board will be part of determining what trails are publicly notified.

General	general comments	1707	1		Andrew Digby		Support the proposed increase in provision for cycling in observation lands in Otago because: - in many areas of Otago there are few opportunities for cycling away from roads and insufficient to cater for growing demand, - Off road biking provides a safe, environmentally friendly, and widely accessible method for the public to visit conservation areas and enables certain groups to experience parts of the country they cannot otherwise access.	Support all new cycle access to areas listed.	Accept After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikiri a Rākaiahautū Place	1707	2		Andrew Digby	Conservation Area - Mavora Lakes (Manawapōpōre/Hikurangi)	It is unclear if the intent is to ban cycling in the Mavora Lakes area since the maps and the CMS review are ambiguous. If this is the case, I strongly disagree with this proposal. Motor vehicles are allowed into the Mavora Lakes Conservation Area (as far as Boundary Hut) - it would be ludicrous to ban bikes. The Te Ararua trail follows the track alongside North Mavora Lake where 4WD vehicles frequent and ruin the track. How is it acceptable for 4WD to use this section of the popular tramping trail, but not for bikes to use the adjacent section?	Delete the section banning cycling in Conservation Area - Mavora Lakes.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikiri a Rākaiahautū Place	1707	3		Andrew Digby	Conservation Area - Greenstone	The review intends to ban cycling in the Conservation Area of Greenstone because cycling would impact on the important tramping values that are present. The Te Ararua trail follows the track alongside North Mavora Lake where 4WD vehicles frequent and ruin the track. How is it acceptable for 4WD to use this section of the popular tramping trail, but not for bikes to use the adjacent section?	Delete the section banning cycling in Conservation Area - Greenstone.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikiri a Rākaiahautū Place	1707	4		Andrew Digby	North Motatapu Conservation Area	The review states that cycling [on this parcel] is "not considered to be compatible with" the experience of "a remote, quiet and tranquil location." This statement is outdated, extremely biased and ignorant of the realities of backcountry tramping and biking. Backcountry biking trips cause no more disturbance than tramping trips. Bike packers do not conform to the dated stereotype of mountain bikers screaming and whooping down trails. They are in the backcountry for solitude and quiet as much as any trampler. Or hunters - how is it acceptable to fire a gun in the backcountry, but not to ride?	Remove the ban of cycling in the North Motatapu Conservation Area, and other areas where it is inferred that cycling is detrimental to the backcountry experience.	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1709	1		Jonny Benson	Maungatika Trail	Support the Maungatika Trail. Extensive information is included in the submission with background about the trail.	Provide for this trail in the CMS	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	1709	2		Jonny Benson	Mapping	Support all tracks shown on the DOC interactive mapping.	Provide for these trails in the CMS	Accept After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	1709	3		Jonny Benson		Strongly oppose all amendments to Policy 3.3.4.	No specific relief sought - see other submission points	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1709	4		Jonny Benson	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	1709	5		Jonny Benson	Limitations	Oppose all the restrictions in the Tables in Part 2 as they are inconsistent with CGP Clause 9.5(b).	no specific relief sought.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikiri a Rākaiahautū Place	1709	6		Jonny Benson		Oppose the exclusion of cycling from these parcels in the Western Lakes and Mountains Place	Provide for cycling on these parcels in the CMS	Accept After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.7 Eastern Otago and Lowlands / Maukaotua Place	1709	7		Jonny Benson		Oppose the exclusion of cycling from these parcels in the Eastern Otago and Lowlands Place	Provide for cycling on these parcels in the CMS	Reject in part After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.8 Catlins/Te Ākau Tai Toka Place	1709	8		Jonny Benson		Oppose the exclusion of cycling from these parcels in the Catlins Place	Provide for cycling on these parcels in the CMS	Reject in part After careful consideration, most of the areas of pcl&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcl&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1709	9		Jonny Benson	Marginal Strips	Oppose the identification of individual parcels/parts of marginal strips in the Tables in Part 2.	All marginal strips should be added to the tables in Part 2	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1709	10		Jonny Benson	Use of section 53(2) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.

General	general comments	1709	11		Jonny Benson		Limiting the addition of potential cycle trail locations to a statutory process must stop. A more broad based identification system gets around the need to detail every trail down to the exact parcels. There is nothing stopping DOC making this change.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Appendix	Reject See standard response. It is not necessary to move the tracks not yet approved to an Appendix.
Specific Policy Requirements	3.3.MTB-intro text	1709	12		Jonny Benson	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unambiguous use of language. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' have been deleted.
Specific Policy Requirements	Policy 3.3.4	1709	13		Jonny Benson	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of possible cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1709	14		Jonny Benson	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering the <u>balance of positive and adverse effects</u> (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be <u>enhanced/avoided, remedied, or mitigated.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	1709	15		Jonny Benson		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on pCl&w	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The partial review has added parcels of pCl&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	1709	16		Jonny Benson		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: " <u>May consider the following criteria where appropriate, when assessing, whether to develop or allow a new cycle trail...</u> "	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considering bike track proposals. Discretion applies to those criteria that start with 'if...required'.
Specific Policy Requirements	Policy 3.3.5	1709	17		Jonny Benson	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on pCl&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on pCl&w (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of pCl&w	Reject in part Policy 3.3.5 (now 3.3.6) b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion'. If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is pCl&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Runanga o Ngāi Tahu is required as part of the proposal and it only covers the pCl&w.
Specific Policy Requirements	Policy 3.3.5	1709	18		Jonny Benson	Criterion (i)	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.	Amend Policy 3.3.5(i) as follows: " <u>If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated.</u> "	Accept This Policy has been amended to read: 'if the ability to generate adequate funding ...'
Specific Policy Requirements	Policy 3.3.5	1709	19		Jonny Benson	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " <u>(i) The positive effects on the purpose and outcomes for the place.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	1709	20		Jonny Benson	Criterion (b)	'Concerns raised' is such a broad and unambiguous use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: "b) implementing mechanisms to manage the adverse effects of <u>concerns-raised</u> , including compliance with the latest version of the Department's cycle trail <u>standards or commonly accepted national trail design guides.</u>	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
Accompanying Info	2.3 Western Lakes and Mountains / Ngā Puna Wai Karikari a Rākaiahautū Place	1709	21		Jonny Benson	Conservation Area - Greenstone	Understand that QIT has received cautious support for a trail from Aukaha and rūnanga for public access to the marginal strip between the Greenstone Stock Bridge and Black Gorge, Elin Bay, Lake Wakatipu / Whakātipu-wai-Māori, subject to more detailed information. DOC mapping for Otago does not identify this parcel of marginal strip, the Trust has researched the certificate of title which is subject to Part IVA of the Conservation Act (see submission for further extensive details on this matter).	Include this parcel in Table 2.3 of the CMS	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.

Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1709	22		Jonny Benson	CR - Leaseback - Ngāi Tahu Lease back Area (2892717)	Understand that QTT has engaged with rūnanga to consider this route as far as the Pass Burn Saddle. For most of its length, the proposed alignment follows an unformed legal road. The existing track is suitable for shared use as far as Pass Burn. The track is suitable for a seasonal period for shared use on this trail, which has proved successful on the Heaphy Track. The Greenstone-Mavora walkway between the Pass Burn and Mavora Lakes is a wide open valley with long sightlines, zero conflict and limited use. The existence of an unformed legal road overlaying and adjacent to the existing track supports cycling on this route. Sharing the trail where it deviates from the unformed legal road is likely to result in far better conservation outcomes than forcing the development of a new parallel trail.	Include this parcel in Table 2.3 of the CMS	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1709	23		Jonny Benson	Conservation Area - Mavora Lakes (Manawapōpōre/Hikurangi)	The Southland Murihiku CMS contradicts DOC's position on this trail, where table 2.2 on page 75 suggests mountain biking is permitted from the North Mavora Swing Bridge to the Kiwi Burn Swing Bridge	Seek that cycling on the Mavora Walkway from the bridge downstream is supported, which would allow a connection to the Kiwi Burn Track for a proposed route to Te Anau.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1709	24		Jonny Benson	North Motatapu Conservation Area	The establishment of the backcountry ski-touring route and hut network from Treble Cone to Coronet Peak via a series of "turk" huts provides the perfect opportunity to develop a new recreational opportunity along the same alignment. It would complement the existing ski touring and alpine skiing activities at the back of a commercial ski area and would enable more people to enjoy a backcountry experience.	Include this parcel in the CMS	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
General	general comments	1711	1		Deidre Vercoe		Support the proposed increase in provision for cycling in conservation lands in Otago because: - in many areas of Otago there are few opportunities for cycling away from roads and insufficient to cater for growing demand; - Off road biking provides a safe, environmentally friendly, and widely accessible method for the public to visit conservation areas and enables certain groups to experience parts of the country they cannot otherwise access.	Support all new cycle access to areas listed.	Accept in part After careful consideration, most proposed areas of pcf&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1711	2		Deidre Vercoe	Conservation Area - Mavora Lakes (Manawapōpōre/Hikurangi)	It is unclear if the intent is to ban cycling in the Mavora Lakes area, since the maps and the CMS review are ambiguous. If this is the case, I strongly disagree with this proposal. Motor vehicles are allowed into the Mavora Lakes Conservation Area (as far as Boundary Hut) so bikes should be allowed. The Te Araroa trail follows the track alongside North Mavora Lake where 4WD access is permitted. Other multi-day tramping tracks are successfully shared with bikers, such as the Old Ghost Road. Both user groups should be given opportunities and there are currently far more opportunities for backcountry walking than biking.	Delete the section banning cycling in Conservation Area - Mavora Lakes.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1711	3		Deidre Vercoe	Conservation Area - Greenstone	The review intends to ban cycling in the Conservation Area of Greenstone because cycling would impact on the important tramping values that are present. The Te Araroa trail follows the track alongside North Mavora Lake where 4WD vehicles frequent and ruin the track. How is it acceptable for 4WD to use this section of the popular tramping trail, but not for bikes to use the adjacent section?	Delete the section banning cycling in Conservation Area - Greenstone.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	1711	4		Deidre Vercoe	North Motatapu Conservation Area	The review states that cycling [on this parcel] is "not considered to be compatible with" the experience of "a remote, quiet and tranquil location." I completely disagree with this statement. There are different genes within the biking community. Bike packing is increasing in popularity and is a completely different experience (for the user and onlookers) to more adrenaline seeking mountain bikers on fast trails.	Remove the ban of cycling in the North Motatapu Conservation Area, and other areas where it is inferred that cycling is detrimental to the backcountry experience.	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
General	general comments	1725	1	Recreation Aotearoa	Sam Newton	Mapping	Support all the tracks in Otago shown on the DOC interactive mapping.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of pcf&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcf&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1725	2	Recreation Aotearoa	Sam Newton		Recreation Aotearoa has reservations about the general notion that individual tracks should be listed in the CMS. This appears to limit the ability of the Department and the community to consult, collaborate and partner with each other to best provide biking opportunities. Recreation Aotearoa opposes any mechanism that restricts a community's ability to explore the development of recreation opportunities - in this case bike trails.	No specific relief sought.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Specific Policy Requirements	Policy 3.3.4	1725	4	Recreation Aotearoa	Sam Newton		Oppose the amendments to Policy 3.3.4. The amendments place additional and unnecessary requirements on the development of a biking trail and creates a higher threshold for bike trail development than, for example, walking trail development.	No specific relief sought, but presumably retain 3.3.4 as originally worded (noting opposition in 1725.5 to the reference to needing to follow statutory amendment process).	Reject The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Specific Policy Requirements	Policy 3.3.4	1725	5	Recreation Aotearoa	Sam Newton		Support for the removal of 'should follow the statutory removal process' from Policy 3.3.4. It is unclear why a resulting statutory review is necessary, and we submit that it may have a basis in misinterpretation of the Conservation Act. If this aspect is not removed [from the policy], the Department and community will be locked into a circular and expensive process, time and resources could be better utilised pursuing its legal requirement under the Conservation Act to foster recreation.	Return to the relevant pre-2016 policy.	See standard response.

General	general comments	1725	6	Recreation Aotearoa	Sam Newton	Marginal strips	It is unnecessary to list individual Marginal Strips. All marginal strips managed by the Department should be eligible for consideration with regard to the development of new bike trails.	No specific relief sought.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1727	1		Clayton Fraser	Cardrona Alpine Cycle Track	Support the proposed Alpine cycle trail from Wanaka to Arrowtown. A safe cycle trail would be a huge asset to the area from a safety perspective enabling cyclists to keep off the road (increasing traffic). The trail would also attract tourists, which is a positive spin off.	No specific relief sought.	Accept After careful consideration, most proposed areas of p&bw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1728	1		Rachel Brown	Maungatika Trail	I oppose the Maungatika Trail: - constructing trails through these areas is not consistent with the desired outcome and policies for the Place; - adverse effects cannot be avoided, remedied or mitigated; - The present cycling opportunities in the targeted parcels of p&bw (and in the vicinity) will readily meet demand for at least the ten-year period of this strategy; - The most accessible parts of Hāwea Conservation Park already provide a more front-country recreational experience - cycling is permitted on the high level Timaru River route to Junction Hut, along the east shore of Lake Hawea to Green Bush Hut; up Boundary Creek, Mt Prospect, Mt Melina and along Melina Ridge. There are also existing networks of cycle tracks along the Grandview Range and Pisa Range. Surveys determine that these opportunities are currently underutilised;	Do not enable the Maungatika Trail to proceed.	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1728	2		Rachel Brown	Maungatika Trail	Maungatika Trust's proposal describes the Hawea Conservation Park as 'underutilised'. I believe there are far more users than immediately obvious, using the area in a private and passive way.	Before considering management decisions for the Hawea conservation Park, the Department should undertake a substantive survey of user groups to establish quantity and quality of park use.	Accept After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1728	3		Rachel Brown	Maungatika Trail	Constructing a trail to the standards of the Old Ghost Road is akin to building a road, albeit narrow, destroying the natural nature of the forested and tussock zones.	Do not enable the Maungatika Trail to proceed.	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1728	4		Rachel Brown	Maungatika Trail	The rationale for not including the North Motatapu Conservation Area in the CMS states that cycling in this area would be a significant change/impact to the existing backcountry recreational activities...	The CMS should include the same statement for the area encompassing the wider Dingle and Timaru catchments (above Junction Hut).	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	1728	5		Rachel Brown	Maungatika Trail	The rationale for not including Ngāi Tahu Lease Back Area in the CMS states that the effects of bike trails cannot be avoided or mitigated, and would impact on the important tramping values present... Timaru Creek is a significantly and appreciatively 'wild' section of the Te Araroa Trail and the Dingleburn hosts a long-established multiday classic tramp with 4 huts.	The CMS should include the same statement for the area encompassing the wider Dingle and Timaru catchments (above Junction Hut).	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	1731	1	Central Otago Queenstown Trails Trust	Janeen Wood	Kawarau Gorge Track	Support this track. Submission provides extensive additional detail about the track proposal.	Ensure this track is provided for in the CMS	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1731	2	Central Otago Queenstown Trails Trust	Janeen Wood	Roxburgh Gorge Track	Support this track. Submission provides extensive additional detail about the track proposal.	Ensure this track is provided for in the CMS	Accept Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1731	3	Central Otago Queenstown Trails Trust	Janeen Wood	Wanaka Link Track	Support this track. Submission provides extensive additional detail about the track proposal.	Ensure this track is provided for in the CMS	Accept in part After careful consideration, most proposed areas of p&bw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1731	4	Central Otago Queenstown Trails Trust	Janeen Wood	Clyde Link Track	Support this track. Submission provides extensive additional detail about the track proposal.	Ensure this track is provided for in the CMS	Accept After careful consideration, most proposed areas of p&bw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1731	5	Central Otago Queenstown Trails Trust	Janeen Wood	Mapping	Support all tracks indicated on the interactive mapping across Otago	No specific relief sought	Accept After careful consideration, most of the areas of p&bw excluded from the Catlins Place remain excluded to protect wildlife values. For the p&bw included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	1731	6	Central Otago Queenstown Trails Trust	Janeen Wood		Strongly oppose all amendments to Policy 3.3.4.	No specific relief sought - see other submission points	Reject See standard response
Specific Policy Requirements	Policy 3.3.4	1731	7	Central Otago Queenstown Trails Trust	Janeen Wood	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	1731	8	Central Otago Queenstown Trails Trust	Janeen Wood		Limiting the addition of potential cycle trail locations to a statutory process must stop. Otherwise, we will see the wasteful cost of the Otago Partial CMS review repeated again and again.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Appendix	Reject See standard response. It is not necessary to move the trails not yet approved to an Appendix.

Specific Policy Requirements	3.3. MTB-intro text	1731	9	Central Otago Queenstown Trails Trust	Janeen Wood	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unspecific use of language. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' have been deleted.
Specific Policy Requirements	Policy 3.3.4	1731	10	Central Otago Queenstown Trails Trust	Janeen Wood	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of <u>possible</u> cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1731	11	Central Otago Queenstown Trails Trust	Janeen Wood	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "....which may require considering <u>the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	1731	12	Central Otago Queenstown Trails Trust	Janeen Wood		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on p&f&w	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response.
Specific Policy Requirements	Policy 3.3.5	1731	13	Central Otago Queenstown Trails Trust	Janeen Wood		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: " <u>May consider the following criteria where appropriate, when assessing whether to develop or allow a new cycle trail...</u> "	Reject A 'should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered bike track proposals. Discretion applies to those criteria that start with 'if...required'.
Specific Policy Requirements	Policy 3.3.5	1731	14	Central Otago Queenstown Trails Trust	Janeen Wood	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on p&f&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on p&f&w (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of p&f&w	Reject in part Policy 3.3.5 (now 3.3.6 b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion. If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is p&f&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Rūnanga o Ngāi Tahu is required as part of the proposal and it only covers the p&f&w.
Specific Policy Requirements	Policy 3.3.5	1731	15	Central Otago Queenstown Trails Trust	Janeen Wood	Criterion (i)	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.	Amend Policy 3.3.5(i) as follows: " <u>If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated.</u> "	Accept This Policy has been amended to read: 'If the ability to generate adequate funding ...'
Specific Policy Requirements	Policy 3.3.5	1731	16	Central Otago Queenstown Trails Trust	Janeen Wood	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " <u>(i) The positive effects on the purpose and outcomes for the place.</u> "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	1731	17	Central Otago Queenstown Trails Trust	Janeen Wood	Criterion (b)	'Concerns raised' is such a broad and unspecific use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: " <u>b) implementing mechanisms to manage the adverse effects or concerns raised, including compliance with the latest version of the Department's cycle trail standards or commonly accepted national trail design guides.</u> "	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
General	general comments	1732	1	Upper Clutha Tracks Trust	John Wellington	Mapping	Support all tracks shown on the DOC interactive mapping.	Provide for these trails in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	1732	2	Upper Clutha Tracks Trust	John Wellington		Oppose all amendments to Policy 3.3.4.	No specific relief sought - see other submission points	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1732	3	Upper Clutha Tracks Trust	John Wellington	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response.
General	general comments	1732	4	Upper Clutha Tracks Trust	John Wellington		Linking the addition of potential cycle trail locations to a statutory process must stop. Otherwise, we will see the wasteful cost of the Otago Partial Review repeated again and again.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Appendix	Reject See standard response.
Specific Policy Requirements	3.3. MTB-intro text	1732	5	Upper Clutha Tracks Trust	John Wellington	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unspecific use of language. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' have been deleted.

Specific Policy Requirements	Policy 3.3.4	1732	6	Upper Clutha Tracks Trust	John Wellington	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of possible cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1732	7	Upper Clutha Tracks Trust	John Wellington	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated."	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Polices allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	1732	8	Upper Clutha Tracks Trust	John Wellington		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on pCl&W	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The partial review has added parcels of pCl&W to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	1732	9	Upper Clutha Tracks Trust	John Wellington		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: "May consider the following criteria where appropriate, when assessing whether to develop or allow a new cycle trail..."	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered bike tracks proposals. Discretion applies to those criteria that start with 'if required'.
Specific Policy Requirements	Policy 3.3.5	1732	10	Upper Clutha Tracks Trust	John Wellington	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on pCl&W. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on pCl&W (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of pCl&W	Reject in part Policy 3.3.5 (now 3.3.6) (b) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion'. If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is pCl&W it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Runanga o Ngāi Tahu is required as part of the proposal and it only covers the pCl&W.
Specific Policy Requirements	Policy 3.3.5	1732	11	Upper Clutha Tracks Trust	John Wellington	Criterion (i)	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.	Amend Policy 3.3.5(i) as follows: "If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated."	Accept This Policy has been amended to read: 'if the ability to generate adequate funding ...'
Specific Policy Requirements	Policy 3.3.5	1732	12	Upper Clutha Tracks Trust	John Wellington	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " (i) The positive effects on the purpose and outcomes for the place. "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Polices allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	1732	13	Upper Clutha Tracks Trust	John Wellington	Criterion (b)	'Concerns raised' is such a broad and unhelpful use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: "b) implementing mechanisms to manage the adverse effects or concerns raised, including compliance with the latest version of the Department's cycle trail standards or commonly accepted national trail design guides.	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	14	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Hawea River	UCT supports inclusion of this parcel to provide for the Hawea True Right Track	Retain this parcel in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	15	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Lake Wanaka (East Side)	UCT supports inclusion of this parcel to provide for the Dublin Bay Track Extension	Retain this parcel in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	16	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Quartz Creek	UCT supports inclusion of this parcel to provide for the Dublin Bay Track Extension	Retain this parcel in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	17	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Clutha River	UCT supports inclusion of this parcel to provide for the Outlet High Track	Retain this parcel in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	18	Upper Clutha Tracks Trust	John Wellington	Hikuwai Conservation Area	UCT supports inclusion of this parcel to provide for the Outlet High Track	Retain this parcel in Table 2.3	Accept

Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	41	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Lake Wanaka (East Side)	UCTT supports inclusion of this parcel to provide for the Lake Wanaka Circuit East Track	Retain this parcel in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	42	Upper Clutha Tracks Trust	John Wellington	Matatiaho Conservation Area	UCTT supports inclusion of this parcel to provide for the Lake Wanaka Circuit East Track	Retain this parcel in Table 2.3	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	43	Upper Clutha Tracks Trust	John Wellington	Boundary Creek Scenic Reserve	UCTT supports inclusion of this parcel to provide for the Lake Wanaka Circuit East Track	Retain this parcel in Table 2.3	Accept Boundary Creek Scenic Reserve is in Table 2.2.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	44	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Makarora River	UCTT supports inclusion of this parcel to provide for the Lake Wanaka Circuit East Track	Retain this parcel in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	45	Upper Clutha Tracks Trust	John Wellington	Manuhaha Stewardship Area	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit East Track	Retain this parcel in Table 2.3	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	46	Upper Clutha Tracks Trust	John Wellington	Lake Hawea Conservation Area	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.3	Accept
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1732	47	Upper Clutha Tracks Trust	John Wellington	Hawea Conservation Park	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.2	Accept After careful consideration Hāwea Conservation Park has been added to Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1732	48	Upper Clutha Tracks Trust	John Wellington	Lake Hawea (Western Shore) Recreation Reserve	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.2	Accept
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1732	49	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Hunter River	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.2	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1732	50	Upper Clutha Tracks Trust	John Wellington	Turihuka Conservation Area	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.2	Accept
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1732	51	Upper Clutha Tracks Trust	John Wellington	Rocky Point Conservation Area	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.2	Accept
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1732	52	Upper Clutha Tracks Trust	John Wellington	Lake Hawea Conservation Area	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.2	Accept
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1732	53	Upper Clutha Tracks Trust	John Wellington	Gladstone Conservation Area	UCTT supports inclusion of this parcel to provide for the Lake Hawea Circuit Track	Retain this parcel in Table 2.2	Accept
Places	Table 2.3: Access to Western Lakes and Mountains Place	1732	54	Upper Clutha Tracks Trust	John Wellington	Marginal Strip - Makarora River	UCTT supports inclusion of this parcel to provide for the Makarora River Track	Retain this parcel in Table 2.3	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
General	general comments	1734	1	NZ Horse Network	Brenda Reading	Horse riding	The CMS is limited to e-bikes only and should include recreational horse riding as well. This has been requested on prior occasions and has not been followed through.	Reword the CMS to include horse riding access to the same areas at least.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
Places	Table 2.4: Access to Central Otago Uplands Place	1734	2	NZ Horse Network	Brenda Reading	Conservation Area - Otekaieke Access Strip (2809840)	Horse riding should be enabled on this parcel as it is an area with an historic bridle track.	Enable horse riding on this parcel.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
Places	Table 2.4: Access to Central Otago Uplands Place	1734	3	NZ Horse Network	Brenda Reading	Otekaieke River Conservation Area	Horse riding should be enabled on this parcel as it is an area with an historic bridle track.	Enable horse riding on this parcel.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
Places	Table 2.4: Access to Central Otago Uplands Place	1734	5	NZ Horse Network	Brenda Reading	Trotters Gorge Scenic Reserve	Trotters Gorge area and its tracks are NOT suitable for e-bikes or motorised bikes, the trails should be slower trail users only.	Do not enable motorised bikes on this parcel.	Reject in part The entry of Trotters Gorge Scenic Reserve in Table 2.4 (under motorised vehicles, bikes, and horses) was an administrative error correction as the parcel was entered in both the Eastern Otago and Lowlands Place (Table 2.7 existing entries); but also Central Otago Uplands Place. Trotters Gorge Scenic Reserve is not a new addition.
Specific Policy Requirements	Policy 3.3.3	1734	6	NZ Horse Network	Brenda Reading		Promotion of opportunities should include all users or trails, not just be limited to cycling. The current wording [of this policy] excludes other users such as horse riders and walkers.	No specific relief sought.	Reject This partial review is only addressing non-motorised bike access. Horses and walking are outside the scope of this review.
General	general comments	1734	7	NZ Horse Network	Brenda Reading		Enabling faster users on e-bikes [on tracks that are shared with other users who travel at different speeds (e.g. walkers and horse riders)] will be detrimental to those travelling at walking speed. Some trails need to be for walking speed users only. If e-bikes are to become trail users, we need some trails that are exclusive for walkers and horse riders. Trails should be separated by user speeds rather than trail user types.	No specific relief sought	Reject E-bikes are allowed where bikes can go. The definition of e-bike already states they are pedal assisted and are 300 watts or under. The definition has been updated to read "Electric power-assisted pedal cycle (e-bike) A bicycle to which one or more auxiliary electric propulsion motors are attached having a combined maximum output not exceeding 300 watts; excluding bicycles with a throttle device controlling the power output."
General	general comments	1735	1		Brenda Reading	Horse riding	The CMS is limited to e-bikes only and should include recreational horse riding as well. This has been requested on prior occasions and has not been followed through.	Reword the CMS to include horse riding access to the same areas at least.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
Places	Table 2.4: Access to Central Otago Uplands Place	1735	2		Brenda Reading	Conservation Area - Otekaieke Access Strip (2809840)	Horse riding should be enabled on this parcel as it is an area with an historic bridle track.	Enable horse riding on this parcel.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
Places	Table 2.4: Access to Central Otago Uplands Place	1735	3		Brenda Reading	Otekaieke River Conservation Area	Horse riding should be enabled on this parcel as it is an area with an historic bridle track.	Enable horse riding on this parcel.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.

Places	Table 2.4: Access to Central Otago Uplands Place	1735	4		Brenda Reading	Trotters Gorge Scenic Reserve	Trotters Gorge area and its tracks are NOT suitable for e-bikes or motorised bikes, the trails should be slower trail users only.	Do not enable motorised bikes on this parcel.	Reject in part The entry of Trotters Gorge Scenic Reserve in Table 2.4 (under motorised vehicles, bikes, and horses) was an administrative error correction as the parcel was entered in both the Eastern Otago and Lowlands Place (Table 2.7 existing entries); but also Central Otago Uplands Place. Trotters Gorge Scenic Reserve is not a new addition.
Specific Policy Requirements	Policy 3.3.3	1735	5		Brenda Reading		Promotion of opportunities should include all users or trails, not just be limited to cycling. The current wording [of this policy] excludes other users such as horse riders and walkers.	No specific relief sought.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
General	general comments	1735	6		Brenda Reading		Enabling faster users on e-bikes (on tracks that are shared with other users who travel at different speeds (e.g. walkers and horse riders)) will be detrimental to those travelling at walking speed. Some trails need to be for walking speed users only. If e-bikes are to become trail users, we need some trails that are exclusive for walkers and horse riders. Trails should be separated by user speeds rather than trail user types.	No specific relief sought	Reject E-bikes are allowed where bikes can go. The definition of e-bike already states they are pedal assisted and are 300 watts or under. The definition has been updated to read "Electric power-assisted pedal cycle (e-bike) A bicycle to which one or more auxiliary electric propulsion motors are attached having a combined maximum output not exceeding 300 watts; excluding bicycles with a throttle device controlling the power output."
General	general comments	1737	1	Cromwell Mountain Bike Club	Andy McDonald	Mapping	Support all tracks shown on the DOC interactive mapping.	Provide for these trails in the CMS	Accept After careful consideration, most of the areas of p&f&w excluded from the Catlins Place remain excluded to protect wildlife values. For the p&f&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	1737	2	Cromwell Mountain Bike Club	Andy McDonald		Oppose all amendments to Policy 3.3.4.	No specific relief sought - see other submission points.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1737	3	Cromwell Mountain Bike Club	Andy McDonald	Statutory review process	Support removal of the requirement to follow the statutory review process from Policy 3.3.4	No specific relief sought	Reject See standard response
General	general comments	1737	4	Cromwell Mountain Bike Club	Andy McDonald		Limiting the addition of potential cycle trail locations to a statutory process must stop. Otherwise, we will see the wasteful cost of the Otago Partial CMS review repeated again and again.	Insert the following at the top of all Part Two Tables: "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" (noting submitter's request re amend Policy 3.3.4). Or relocate a list of trails that are not yet approved to an updateable appendix to the CMS and insert the same text above at the beginning of this Appendix.	Reject See standard response. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Specific Policy Requirements	3.3. MTB-intro text	1737	5	Cromwell Mountain Bike Club	Andy McDonald	Reference to 'concerns raised' in section 3.3	'Concerns raised' is such a broad and unspecific use of language. This should be deleted from all parts of Policy 3.3. as it has no basis in sound policy or decision making. This sort of use of vague language cannot be found in the CMS glossary and is not used in the Conservation Act, which is the defining document under which a CMS is created.	Delete all occurrences of the words 'concerns raised' within the rewritten policies in Part Three.	Accept 'Concerns raised' have been deleted.
Specific Policy Requirements	Policy 3.3.4	1737	6	Cromwell Mountain Bike Club	Andy McDonald	Criterion (a)	Reference to the requirement to 'follow the statutory amendment or review process' is in contradiction to the Conservation Act. The policy instructs the CMS to undergo a statutory review of itself (creating a circular conflict within the CMS document). There is no evidence or mandate to insert statutory review. Two independent legal views have confirmed that DOC's interpretation of the Conservation Act is flawed and illegal. This statutory review clause was added to the 2016 CMS without any mandate to do so, despite public feedback at the time stating that it would create the partial CMS review mess we are in today. There is no parallel or reasonable justification why a statutory process and the associated time and cost should be incurred to update a list of possible cycle trails.	Delete 3.3.4(a)	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	1737	7	Cromwell Mountain Bike Club	Andy McDonald	Criterion (c)(i)	There is a lack of balance [in the criteria] when considering new cycle trails. DOC has taken a deficit mindset with a single focus on negative concerns. The Conservation Act, CMS objective and goals are supportive of recreation and cycling but positive concerns are entirely absent from Policy 3.3.4 consideration as written.	Amend Policy 3.3.4(c)(i) as follows: "...which may require considering the balance of positive and adverse effects (including cumulative effects) of the activity on natural, historic, and cultural values and other recreational users can be enhanced/avoided, remedied, or mitigated."	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.5	1737	8	Cromwell Mountain Bike Club	Andy McDonald		Proposed policy 3.3.5 is a substantial expansion on the assessment criteria of the current CMS policy 3.3.4(c). The current four criteria in the current policy have been expanded with 15 criteria which is disproportionately large compared with the assessment of other activities on p&f&w	Delete Policy 3.3.5 and replace with current CMS Policy 3.3.4(c).	Reject See standard response. The partial review has added parcels of p&f&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.5	1737	9	Cromwell Mountain Bike Club	Andy McDonald		As currently written, it is possible that DOC will interpret 3.3.5 as 'must assess all criteria. This will likely create unnecessary and substantive compliance costs where some of the criteria may not be relevant for the application.	Amend Policy 3.3.5 as follows: "May consider the following criteria where appropriate, when assessing whether to develop or allow a new cycle trail..."	Reject A 'Should' policy has a strong expectation of outcome and provides clear guidance when considering authorisations. It is appropriate this remains a 'Should' policy as the detailed criteria needs to be taken into account when considered cycle trail proposals. Discretion applies to those criteria that start with 'if...required'.

Specific Policy Requirements	Policy 3.3.5	1737	10	Cromwell Mountain Bike Club	Andy McDonald	Criterion (b), (c), and (e)	As drafted, DOC appears to be assessing the merits of the entire cycle trail in the first paragraph of Policy 3.3.5, regardless of how much of the trail might be on pcli&w. It is important that the assessment is only for the section of trail on DOC land. DOC is at risk of overstepping its mandate. Consultation overload is being designed into each isolated part of the process without considering the entire process. E.g. consultation requirements in 3.3.4, 3.3.5, 3.3.5 notified stage, resource consent.	If Policy 3.3.5 is to be retained, amend as follows: (b) If the long term effects of climate change, including flooding and erosion are relevant. (c) If specialist reports are required, to assess the adverse effects of the cycle track or trail on pcli&w (e) If engagement is required with Rūnaka and Te Runanga o Ngāi Tahu, it has been carried out to inform the assessment of the proposed cycle track or trail as related to the section of pcli&w	Reject in part Policy 3.3.5 (now 3.3.6) has been revised to read, 'any carbon emissions associated with the biking activity and the long-term effects of climate change, including flooding and coastal erosion.' If, at the beginning of the Policy provides for the assessment of relevance. 3.3.5 (c) the CMS only covers land that is pcli&w it does not apply to private lands. 3.3.5 (e) engagement with the Rūnaka and Te Runanga o Ngāi Tahu is required as part of the proposal and it only covers the pcli&w.
Specific Policy Requirements	Policy 3.3.5	1737	11	Cromwell Mountain Bike Club	Andy McDonald	Criterion (f)	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.	Amend Policy 3.3.5(f) as follows: "If the ability to generate adequate funding for the construction and ongoing maintenance of the proposed track or trail can be demonstrated."	Accept This Policy has been amended to read: 'If the ability to generate adequate funding ...'
Specific Policy Requirements	Policy 3.3.5	1737	12	Cromwell Mountain Bike Club	Andy McDonald	New criterion	DOC has taken a deficit mindset with a focus on negative criteria. The Conservation Act, CMS objectives and goals are supportive of recreation and cycling but positive criteria are absent from the assessment criteria.	Amend Policy 3.3.5 to insert a new criterion: " (j) The positive effects on the purpose and outcomes for the place. "	Accept in part The positive effects for public health and the financial benefits of biking are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for biking opportunities while ensuring adverse effects are addressed. Policy 3.3.4 is also about the promotion of the opportunities.
Specific Policy Requirements	Policy 3.3.6	1737	13	Cromwell Mountain Bike Club	Andy McDonald	Criterion (b)	'Concerns raised' is such a broad and unspecific use of language. These words should be deleted as it has no basis in sound policy and decision making. DOC may not be the authority on cycle trail best practise and/or have an up-to-date design standard.	Amend Policy 3.3.6(b) as follows: "b) implementing mechanisms to manage the adverse effects of concerns raised , including compliance with the latest version of the Department's cycle trail standards or commonly accepted national trail design guides.	Accept in part 'Concerns raised' has been removed from the Policy 3.3.6. DOC cycle trail standards have been developed using the current design guides and will be updated if any new techniques or improvements are developed.
General	general comments	1738	1		Ian Turnbull		The Partial Review is in general hard to follow, disjointed, and confusing in its layout.	Undertake a thorough edit and revision of the layout and simplify it by shifting the tables to the end.	Accept in part The changes made as a result of submissions will improve the final document before it is incorporated into the CMS.
General	general comments	1738	2		Ian Turnbull		The grounds used to classify areas into 'not allowed' and 'allowed' only become apparent on page 23 (of the partial review). These reasons must be applied consistently. It appears that conservation values have only been seriously considered in some parts of the Western Lakes and Mountains, and the Eastern Otago Lowlands places.	Insert the grounds on which various areas of pcli&w have been classified as 'allowed' and 'not allowed' as an introduction to the partial review.	Reject After careful consideration, most proposed areas of pcli&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	1738	3		Ian Turnbull		There are so many areas and tracks listed in the various Tables that it is not practicable to comment on the recommendation status of all areas. The blanket approach of categorising pcli&w into two categories obscures some potentially highly intrusive proposals.	It would be easier to understand the intent of this Partial Review if it were restructured so that areas where trails are not allowed were described first; areas where trails already exist were in another category; and areas where trails may have been (or may be) proposed are in a third category.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
General	general comments	1738	4		Ian Turnbull		Without compulsory public notification, and mandatory requirements for all proposals to go through a rigorous assessment process (Section 3.3), I fear for much of Otago's public conservation estate.	The default position should be that any new (proposed) trails should be automatically not allowed unless the proponents can demonstrate at their own expense - that they can meet the criteria listed under Policies 3.3.1 to 3.3.5.	Accept The proposed changes to the CMS are not the approval process for new bike tracks, they allow the bike track to be considered subject to the strengthened criteria in Section 3.3. If a track is to be developed the proponents are required to meet the tests of the 3.3 Policies are their expense.
Places	Policy 2.2.6	1738	5		Ian Turnbull		Change wording [of this policy] so that cycling (all types) is not allowed as of right.	Amend Policy 2.2.6 as follows: "Should <u>May</u> allow motorised vehicle..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(f) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.2, and subject to Policies 3.2.1-3.2.12 and 3.3.1-3.3.11 in Part Three.'
General	general comments	1738	6		Ian Turnbull		Many of the tracks in the Tables are totally unsuitable for 4WD vehicles so the wording should reflect this. This Partial Review is about cycle access: 4WD access should be dealt with separately.	Remove reference to 4WD vehicle or clarify which existing tracks they may be allowed on.	Accept in part Non-motorised bikes can go where motorised vehicles can go. However, the Tables are not allowing for motorised vehicles to go on bike tracks, they have separate Tables which are not part of this partial review. The Policy at the start of the Place section detailed in the partial review are for both motorised vehicles and non-motorised bikes and in accordance with their separate Tables.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1738	7		Ian Turnbull	Hāwea Conservation Park	The wording in Section 2.2 effectively states that cycle access should be allowed in the Hāwea Conservation Park.	Remove Hāwea Conservation Park from Table 2.2 and put it into the 'not supported' category.	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	1738	8		Ian Turnbull		The tables state that 'proposed' tracks are allowed (albeit with conditions). Given that this review is aimed at isolating areas where such 'proposed' tracks may be allowed, it is quite inappropriate to list them with existing tracks until all due process has been followed.	Take all 'proposed' tracks out of all tables and place in a separate table.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. A separate Table is not required.
Places	Table 2.2: Access to Te Papanui, Oteake and Hāwea Conservation Parks Place	1738	9		Ian Turnbull	Hāwea Conservation Park	The reasons that are cited on page 23 in respect of the parcels of pcli&w that are not supported in the Western Lakes and Mountains Place also apply to Hāwea Conservation Park and to many other areas of pcli&w in the area under review.	Change the status of the Hāwea Conservation Park from 'allowed' to 'not allowed' with the exceptions of areas where there are existing 4WD tracks (Mt Melina, Breast Hill, Boundary Creek).	Reject After careful consideration Hāwea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.

Places	Policy 2.3.2	1738	10		Ian Turnbull		Change wording (of this policy) so that cycling (all types) is not allowed as of right.	Amend Policy 2.3.2 as follows: " Should <i>May</i> allow motorised vehicle..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.3, and subject to Policies 3.2.1-3.2.12 and 3.3.1-3.3.11 in Part Three.'
Places	Table 2.4: Access to Central Otago Uplands Place	1738	11		Ian Turnbull	Pisa Conservation Area	Inclusion of 'proposed tracks' on Mt Hocken and Mt Scott in the Pisa Conservation Area is another example of potentially allowing inappropriate development (as) of right. These tracks would have a devastating effect on the landscape values of the Conservation Area.	All proposed tracks should be in a separate Table and not be 'allowed' without all due public notification and debate.	Accept in part Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied. The proposed tracks do not need to be in a separate Table.
Places	Discussion box- Mahaka Katia Scientific Reserve (Pisa Flats)	1738	12		Ian Turnbull	Mahaka Katia Scientific Reserve	Mahaka Katia [Scientific Reserve] has been set aside for protection of threatened and nationally critical dryland plants. How can anyone even think of putting a cycle trail through it? Any proposal for a cycle trail alongside must be publicly notified so all interested parties - especially those keen on conservation of threatened species - can comment.	All parts of this reserve must be in the 'not allowed' category.	Accept Due to the endangered species Mahaka Katia Scientific Reserve has not been included in the CMS.
Specific Policy Requirements	Policy 3.3.1	1738	13		Ian Turnbull		As worded, this policy allows both existing and proposed cycle trails in the areas in the relevant tables.	Remove all 'proposed' trails from all tables and place them in a separate category. Require all the sub-policies to be followed without exception.	Accept in part The proposed tracks do not need to be in a separate Table, however have been removed from the Tables which now identify where biking can occur and where bike tracks can be considered subject to the Policy 3.3.6. The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d) and are used in decision making policies particular around authorisations, such as guided biking. Should policies have a strong expectation of outcome. A 'may' policy has more discretion, particularly in ensuring consistency with the Part Two Tables. The Policy will remain 'Should allow'. This policy is not about the consideration of bike trails that is covered under Policy 3.3.6.
Specific Policy Requirements	Policy 3.3.2	1738	14		Ian Turnbull		Support this policy.	No specific relief sought.	Accept This Policy is now 3.3.3 and has been revised to read 'Where biking is restricted to tracks or roads, bikers must remain on the formed bike track or road at all times.'
Specific Policy Requirements	Policy 3.3.3	1738	15		Ian Turnbull		Promotion of opportunities (for cycling) would be acceptable for existing tracks, trails, and other routes.	Amend Policy 3.3.3 as follows: <i>Promote opportunities for mountain biking... on existing tracks, ...</i>	Accept in part Promoting where biking can occur on the Department's website and working with the bike clubs and visitor information provides is an important tool in managing the activity of biking to ensure it is undertaken in the appropriate places with consideration to other users of the area. The Policy is now 3.3.4 and has been reworded to read 'Promote opportunities for approved bike tracks on public conservation lands and waters in Otago via the Department's website; and through liaison with biking advocates and visitor information providers.'
Specific Policy Requirements	Policy 3.3.4	1738	16		Ian Turnbull	Criterion (c)(i)	This clause gives too much discretion. Detrimental effects MUST be remedied or mitigated.	Amend Policy 3.3.4(c)(i) as follows: <i>"is consistent with the purposes for which the lands and waters concerned are held (which may must include...)</i>	Accept in part The Policy has been revised to state: 'is consistent withare held (which requires considering the extent of'
Specific Policy Requirements	Policy 3.3.4	1738	17		Ian Turnbull		The current wording of this policy allows too much discretion. As written, this policy only applies to areas not in the Tables. Which are these new areas? Those where cycling is not allowed? Are those tables not comprehensive?	Amend Policy 3.3.4 as follows: <i>"Should Must, when considering new opportunities not identified in Policy 3.3.1 for..."</i>	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. Must is not provide for in the Conservation General Policy.
Specific Policy Requirements	Policy 3.3.5	1738	18		Ian Turnbull		The current wording of this policy allows too much discretion. (assessment of these matters) must be obligatory. The sub-policies are comprehensive, and I support the requirements. However, the surveys and assessments referenced must be provided by the proponents of new cycle trails, not funded by DOC (the public).	Amend Policy 3.3.5 as follows: <i>"Should Must assess the following..."</i>	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. Must is not provide for in the Conservation General Policy. The Policy will remain 'Should allow'.
Specific Policy Requirements	Policy 3.3.5	1738	19		Ian Turnbull	Criterion (d)	These are public lands. Public notification must be mandatory.	Amend criterion (d) to the following wording: <i>"that the public has been notified of the proposal and given the opportunity to comment."</i>	Reject in part The criteria detailed in the policies along with public interest and the Otago Conservation Board will be part of determining what trails need to be publicly notified. Notification may not always be necessary. The Policy has been revised to read 'if public notification is required for the bike track once the route and facilities are known'.
Specific Policy Requirements	Policy 3.3.6	1738	20		Ian Turnbull		Is this what 'conservation' means? By all means grant authorisations (with conditions) [to build and maintain cycle trails], but should DOC be building cycle trails?	Amend Policy 3.3.6 as follows: <i>"Construct and maintain, and may grant authorisations to construct and maintain..."</i>	Reject DOC does have a responsibility to enable recreation opportunities and the CMS needs to reflect there are times when the construction and maintenance of trails built by the DOC is required subject to the same scrutiny as those built by others.
Specific Policy Requirements	Policy 3.3.7	1738	21		Ian Turnbull		Support this policy.	No specific relief sought.	Accept
Specific Policy Requirements	Policy 3.3.8	1738	22		Ian Turnbull		Support this policy.	No specific relief sought.	Accept
Specific Policy Requirements	Policy 3.3.9	1738	23		Ian Turnbull		Support this policy.	No specific relief sought.	Accept

Specific Policy Requirements	Policy 3.3.10	1738	24		Ian Turnbull		Downhill, freestyle and dirt jumping can have a much greater physical impact from construction, so should assessment criteria be far more rigorous?	No specific relief sought.	Accept in part The use of the word 'Should' comes from the Conservation General Policy 2005, policy 1(d). Should policies have a strong expectation of outcome. Policy 3.3.10 has now been moved and has been added to Policy 3.3.6 as one of the assessments when determining the appropriateness of a bike track.
Places	Policy 2.4.5	1738	27		Ian Turnbull		Change wording [of this policy] so that cycling (all types) is not allowed as of right.	Amend Policy 2.4.5 as follows: " Should <u>May</u> allow motorised vehicle..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.4, and subject to Policies 3.2.1-3.2.12 and 3.3.1-3.3.11 in Part Three.'
Places	Policy 2.5.6	1738	28		Ian Turnbull		Change wording [of this policy] so that cycling (all types) is not allowed as of right.	Amend Policy 2.5.6 as follows: " Should <u>May</u> allow motorised vehicle..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.5, and subject to Policies 3.2.1-3.2.12 and 3.3.1-3.3.11 in Part Three.'
Places	Policy 2.6.10	1738	29		Ian Turnbull		Change wording [of this policy] so that cycling (all types) is not allowed as of right.	Amend Policy 2.6.10 as follows: " Should <u>May</u> allow motorised vehicle..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.6, and subject to Policies 3.2.1-3.2.12 and 3.3.1-3.3.11 in Part Three.'
Places	Policy 2.7.13	1738	30		Ian Turnbull		Change wording [of this policy] so that cycling (all types) is not allowed as of right.	Amend Policy 2.7.13 as follows: " Should <u>May</u> allow motorised vehicle..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.7, and subject to Policies 3.2.1-3.2.12 and 3.3.1-3.3.11 in Part Three.'
Places	Policy 2.8.7	1738	31		Ian Turnbull		Change wording [of this policy] so that cycling (all types) is not allowed as of right.	Amend Policy 2.8.7 as follows: " Should <u>May</u> allow motorised vehicle..."	Reject The use of the word 'Should' comes from the Conservation General Policy 2005, Policy 1(d) and used in decision making policies particularly around authorisations. Should policies have a strong expectation of outcome. The Policy will remain 'Should allow', however has been reworded to read 'Should allow motorised vehicle and non-motorised bike use only on tracks and roads purposely formed and maintained for vehicle use on public conservation lands and waters identified, and in accordance with any criteria in Table 2.8, and subject to Policies 3.2.1-3.2.12 and 3.3.1-3.3.11 in Part Three.'
General	general comments	1739	1	Horse Trails South Trust	Pete Hurst	Horse riding	All tracks and trails should be inclusive of all forms of non-motorised transport. Track design should be for all forms of non-motorised transport. Bridges should be constructed to enable horse passage. Various user groups should work together on public tracks to enable better cohesion and a better overall result.	No specific relief sought in respect of the contents of the Partial Review.	Reject This partial review is only addressing non-motorised bike access. Horses are outside the scope of this review.
Places	Table 2.4: Access to Central Otago Uplands Place	1740	1	Otekaieke Station	Antony Bayley	Otekaieke River Conservation Area	We oppose the proposal for cycle access within the Otekaieke River Conservation Area as the only current viable safe cycling route would be out of the river's marginal strip and this would require access instead across private land. The land is a working sheep and beef farm, so access would need to be restricted during certain times of the year. There are also regular pig hunters on the land, and hill country cattle can present a danger. A permanently open cycleway access would not be a viable option in this area. The Danseys Pass Road would offer a much better alternative to reach the Waitaki Valley from Danseys Pass.	No specific relief sought in respect of the contents of the Partial Review.	Reject Otekaieke River Conservation Area has been retained. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including consultation with adjoining landowners.
General	general comments	1741	1	Dunedin Tracks Network Trust	Rhys Millar, Rachel Elder, Sarah Davie-Nittis		Supports DOC considering the development of tracks and trails in specified listed areas. Also support the inclusion of any tracks that enable the Oamaru to Dunedin trail (extension of Alps to Ocean Trail), extension of the Otago Central Rail trail from Middlemarch to Dunedin, the extension of the Lawrence to Waihola (Clutha Gold to Dunedin).	Support for CMS	Accept in part After careful consideration, most proposed areas of pōiāw have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.

General	general comments	1741	2	Dunedin Tracks Network Trust	Rhys Millar, Rachel Elder, Sarah Davie-Nitis		The Trust wishes to support the alignment of organisation strategy across key stakeholders including DOC, DCC, ORC Kiwi rail, NZTA and Iwi, for the development of an inter-regional, Otago wide, integrated network of cycleways and shared tracks. The Dunedin Tracks Network Trust identifies the opportunity for dialogue between key stakeholders to create partnerships alongside community groups to support and enable the development of a larger Track Network vision connecting tracks and trails across the region with our breath-taking natural environments.	Otago CMS creates an opportunity to create a whole new vision for tracks and trails in the Dunedin region. Alignment of Strategies and policies of local stakeholders (Dunedin City Council, Otago Regional Council, NZTA, Kiwi rail, DOC and local communities).	Accept in part After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	Form 4	1	members (QMTBC)			Seek that specific tracks do not need to be listed individually within the CMS, nor that a statutory review is required for alterations. This is not appropriate and is not in line with DOC's own policies. Individual tracks can be assessed and constructed outside the CMS.	Remove all references to specific tracks from the CMS (except already existing tracks potentially) and instead approve pcl&w areas for cycle and mountain bike trail construction.	See standard response.
General	general comments	Form 4	2	members (QMTBC)			Seek that the aspirations of the community, which are conveyed through Vision Beyond 2050 are taken into account in the development of the CMS. Submission highlights some key themes relating to: - accessibility for all people; - vision of kaitiaki - more bike trails enable more access to pcl&w so that residents and visitors can grow appreciation of the natural environment and desire to care for and protect it through bicycle based recreation; - active travel being an integral part of an accessible and safe network for all.	No specific relief sought	Accept in part After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	Form 4	3	members (QMTBC)			Request that DOC ensures it is doing all it can to deliver its own Destination Management Framework, outcomes and targets by enabling the community bicycle access to all pcl&w throughout the CMS.	No specific relief sought in relation to the draft CMS. Seeking that DOC support and enable cycling. Finding ways to simplify and speed up planning.	Accept in part After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	Form 4	4	members (QMTBC)			Alterations should be made to the CMS to ensure that biking and e-biking is treated in the same way as walking and that cycle trails are no more onerous to develop than a walking trail.	No specific relief sought.	Accept in part Biking and e-biking are being treated the same in this partial review. When walking tracks are developed or infrastructure improved the same considerations detailed in the CMS are undertaken, including the specialist reports and assessments.
General	general comments	Form 4	5	members (QMTBC)		Statutory review process	Request that DOC remove the requirement to undertake a statutory review process to make alterations to the CMS.	No specific relief sought.	Reject See standard response.
General	general comments	Form 4	6	members (QMTBC)			Support all tracks added to the CMS. Inclusion of all these trails aligns with the purpose of DOC. Will enable our community and visitors to engage with natural environment and become greater stewards of our land through cycling recreation.	Retain all trails which have been added to the CMS as part of this review.	Accept in part After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	Form 4	7	members (QMTBC)			Oppose the removal of any cycling tracks from the CMS e.g. the Peninsula section of the Moke Lake Track.	retain all tracks which have been removed from the CMS as part of this review.	Reject Moke Lake Recreation Reserve has been retained however the peninsula portion of the Moke Lake Loop Track is excluded due to health and safety concerns and the track not being suitable for shared use. After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
General	general comments	Form 4	8	members (QMTBC)			Oppose the exclusion of any tracks that were put forward but have not been provided for in the CMS. Inclusion of all tracks aligns with purpose of DOC and allow the community and visitors to engage with our natural environment and become stewards.	Oppose that any proposed tracks are opposed within the CMS.	Accept in part After careful consideration, most proposed areas of pcl&w have been added to the CMS, so a bike tracks can be considered. Any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	Form 4	9	members (QMTBC)			This policy (and others) make it more onerous to create a cycling track than a walking track (under Policy 3.2.3). The amendments have not been sought by the cycling community and are not justified by a failure of the current policy or any change to the CGP which underpins the CMS. There is not appropriate evidence that the current approach requires changing - less restrictions and a more agile policy approach is required.	Oppose any amendment to Policy 3.3.4 that makes it more onerous to create a cycling trail than a walking trail. Ensure that barriers are removed and the process of creating a cycling or mountain biking trail is simplified.	Reject See standard response. The partial review has added parcels of pcl&w to the CMS and allows the consideration of bike tracks to be undertaken later. The criteria in Policy 3.3.5 (now 3.3.6) has been strengthened to ensure it contains robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. If we did not change these policies, the assessments would need to be completed prior to us undertaking the partial review.
Specific Policy Requirements	Policy 3.3.4	Form 4	10	members (QMTBC)			Remove the "should follow the statutory review process" from this policy. This clause is unnecessary and not justified in terms of CGP. It's wasting time and valuable resources on all sides.	Removal of any requirement for a statutory review process in order to develop additional cycle or mountain bike trails.	See standard response.
General	general comments	Form 4	11	members (QMTBC)		Limitations (tables)	Strongly oppose wording in some of the tables that exclude tracks from Beech Forest e.g. table 2.3 Devil's Creek Conservation Area. This approach of complete exclusion is absolutely unnecessary and undermines DOC's own concept of developing stewardship and love of our native forest.	These exclusions should be removed and replaced with more positive outcome driven sentences such as 'should ensure beech forest is respected'	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	12	members (QMTBC)		Mt Crichton Scenic Reserve	Do not agree with the wording 'must avoid beech forest damage'.	Wording should be replaced with wording such as 'should ensure beech forest is respected' or 'should be developed in a way which aligns with desired outcomes.'	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. Mt Crichton Scenic Reserve is excluding Mt Crichton Loop Track.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	13	members (QMTBC)		Limitations (tables)	Oppose wording such as 'must avoid ridgelines and prominent landscape features' such as for Mt Crichton Scenic Reserve, Rastus Burn Recreation Reserve and others. This wording could be used to unnecessarily inhibit track development. Too much interpretation as to what a prominent landscape is. Specific issues can be addressed at detailed planning stage.	These exclusions should be removed and replaced with more positive outcome driven sentences such as 'should be developed on ridgelines in a respectful manner'	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.

Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	14	members (QMTBC)	Ben Lomond Scenic Reserve	There are existing trails in this parcel which are missing from the list (e.g. Fernhill Loop Trail and Salmon Run). Request that no specific trails are listed.	Change wording to 'current and future proposed tracks'; or remove limitation entirely.	Accept Reference to 'proposed tracks' have been removed from the Part Two - Tables. Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	15	members (QMTBC)	Mt Crichton Scenic Reserve	Oppose listing of specific tracks. Phoenix is not a climb, and is in the Wilson Bay Recreation Reserve	Change wording to 'current and future proposed tracks'; or remove limitation entirely.	Accept in part Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation. Mt Crichton Scenic Reserve is excluding Mt Crichton Loop Track.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	16	members (QMTBC)	Lower Shotover Conservation Area	Oppose removal of this parcel from Table 2.3	Reinstate this parcel in Table 2.3	Accept Lower Shotover Conservation Area has been retained and is now listed under its proper name Conservation Area - Lower Shotover.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	17	members (QMTBC)	McChesney's Conservation Area	Oppose listing of specific tracks.	Change wording to 'current and future proposed tracks'; or remove limitation entirely.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	18	members (QMTBC)	Marginal Strip - Arrow River	Request removing limitations entirely. This area is not particularly sensitive to trails and additional access will support weed and predator control.	Remove specific reference to tracks. Remove limitations from this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	19	members (QMTBC)	Marginal Strip - Bush Creek	Request removing limitations entirely. This area is not particularly sensitive to trails and additional access will support weed and predator control.	Remove specific reference to tracks. Remove limitations from this parcel.	Accept in part Marginal strips in each Place section are no longer listed individually unless they have particular limitations. This should address the concerns over certain section of the marginal strip being missed. Approval of the bike tracks will be subject to the criteria listed in Part 3.3.
Places	Table 2.3: Access to Western Lakes and Mountains Place	Form 4	20	members (QMTBC)	Wilson Bay Recreation Reserve	Request removing limitations entirely. This area is a recreation reserve and abuts other scenic reserves with no limitations.	Remove limitations from this parcel.	Accept Many of the limitations have been removed and those remaining are to manage a specific location. The policies in Section 3.3 have been strengthened to ensure they contain robust criteria which proposals will be assessed against, including conservation assessments and if there is a need for further public consultation.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	Form 4	21	members (QMTBC)	Link to Mavora Lakes from the Greenstone	A link from the top of Lake Wakatipu through the Mavora Lakes via the Greenstone should be included as it forms an important connection between places. Potential concerns can be worked through at the detailed design stage.	Oppose the exclusion of this link from the CMS.	Accept in part Mavora Lakes (and part of the Ngāi Tahu Leaseback Area) are in Southland and not included in this partial review. However, after careful consideration Conservation Area Greenstone has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated subject to the section 3.3 Policies in the Southland and Otago CMS, including early engagement with Ngāi Tahu as required by the Ngāi Tahu Claims Settlement Act 1998.
Accompanying Info	2.3 Western Lakes and Mountains /Ngā Puna Wai Karikari a Rākaiahautū Place	Form 4	22	members (QMTBC)	North Motatapu Conservation Area	There is potential to construct a world class alpine trail in this area linking Treble Cone to Macetown. These are limited opportunities in NZ.	Oppose the exclusion of this parcel from the CMS	Accept After careful consideration North Motatapu Conservation Area has been added to Table 2.3, so a bike track can be considered. Any proposal will need to be investigated and subject to the section 3.3 Policies.
General	general comments	Form 4	23	members (QMTBC)	Terms	different references throughout the document to 'mountain biking', 'cycling' and 'electric power assisted cycle' etc. This can be confusing.	Request that cycling, mountain biking and e-biking are interchangeable terms for the purpose of this document.	Accept The CMS has been revised to use the terms, bikes, bikers and bike tracks. The Tables now provide access for non-motorised bikes, which includes e-bikes and definitions have been added to the Glossary.
General	general comments	Form 4	24	members (QMTBC)	Positive effects	There is a lack of acknowledgement throughout the CMS (e.g. 3.3.4 c) to positive effects, with a focus on adverse effects.	Ensure that in all places where potential negative impacts are mentioned, these are equally balanced with positive impacts.	Accept in part The positive effects for both public health and the financial benefits of cycling opportunities are acknowledged in the descriptive text at the start of Section 3.3. The 3.3 Policies allow for mountain biking opportunities while ensuring adverse effects are addressed. Policy 3.3 is also about the promotion of the opportunities.
Specific Policy Requirements	3.3. MTB-intro text	Form 4	25	members (QMTBC)	E-bikes	Strongly support the addition of e-bikes into Section 3.3 and that they are treated in the same way as a regular bike.	Support e-bikes being included in Section 3.3.	Accept
General	general comments	Form 1	1		Mapping	Support all the tracks in Otago shown on the DOC interactive mapping. This process is about adding tracks to the tables such that they can at some future date be 'talked' about only. This is not an APPROVAL process. Until detailed analysis is undertaken in the future to the test in Policy 3.3 we should not pass judgement on any of them. In every NP are already walking tracks. No concern needed that 120 tracks will be developed during the life of the CMS. The successful few tracks will be funded by the community.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of pōiāw excluded from the Caplins Place remain excluded to protect wildlife values. For the pōiāw included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	Form 1	2			Oppose all amendments to Policy 3.3.4. The amendments will place unreasonable standards on cycle trails that are much higher than those imposed on new walking tracks under Policy 3.2.3. Amendments have not been sought by the cycling community. There is no evidence the current policy is not fit for purpose. The proposed wording is inconsistent with other CMS.	No relief specified, but presumably delete this policy.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	Form 1	3			Support removal of 'should follow the statutory review process' from Policy 3.3.4. This clause is unnecessary and is not justified in terms of the CGP. It is the reason for the current CMS review and is wasting valuable time and resources on all sides.	No relief specified, but presumably remove the requirement to follow this process from the CMS.	Reject See standard response.

General	general comments	Form 1	4		Use of section 53(2)(j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
General	general comments	Form 2	1		Mapping	Support all the tracks in Otago shown on the DOC interactive mapping. In particular the Maungatika Track in the Hawea Conservation Area. This process is about adding tracks to the tables such that they can at some future date be 'talked' about only. This is not an APPROVAL process. Until detailed analysis is undertaken in the future to the test in Policy 3.3 we should not pass judgement on any of them. In every NP are already walking tracks. No concern needed that 120 tracks will be developed during the life of the CMS. The successful few tracks will be funded by the community.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of pcf&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcf&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	Form 2	2			Oppose all amendments to Policy 3.3.4. The amendments will place unreasonable standards on cycle trails that are much higher than those imposed on new walking tracks under Policy 3.2.3. Amendments have not been sought by the cycling community. There is no evidence the current policy is not fit for purpose. The proposed wording is inconsistent with other CMS.	No relief specified, but presumably delete this policy.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	Form 2	3			Support removal of 'should follow the statutory review process' from Policy 3.3.4. This clause is unnecessary and is not justified in terms of the CGP. It is the reason for the current CMS review and is wasting valuable time and resources on all sides.	No relief specified, but presumably remove the requirement to follow this process from the CMS.	Reject See standard response.
General	general comments	Form 2	4		Use of section 53(2)(j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an authorised utility, this can bypass public scrutiny and consultation.	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	Form 2	5		Maungatika Trail	Support for the proposed Maungatika Track in Hawea Conservation Park. Great concept similar to Papanoa Great walk. Will create a world class multi day single track of high environmental standards. Will also improve access for hunting. Fully funded by private partners.	not specified but include in table 2.2	Accept After careful consideration Hawea Conservation Park has been retained in Table 2.2 without limitations, this allows for the investigation into the tracks feasibility to be undertaken. Any investigation would be subject to section 3.3 Policies.
General	general comments	Form 3	1		Mapping	Support all the tracks in Otago shown on the DOC interactive mapping. In particular the Maungatika Track in the Hawea Conservation Area. This process is about adding tracks to the tables such that they can at some future date be 'talked' about only. This is not an APPROVAL process. Until detailed analysis is undertaken in the future to the test in Policy 3.3 we should not pass judgement on any of them. In every NP are already walking tracks. No concern needed that 120 tracks will be developed during the life of the CMS. The successful few tracks will be funded by the community.	No relief specified, but presumably some way of reflecting all tracks in the CMS	Accept After careful consideration, most of the areas of pcf&w excluded from the Catlins Place remain excluded to protect wildlife values. For the pcf&w included in the CMS any proposal will need to be investigated and subject to the criteria detailed in the 3.3 Policies.
Specific Policy Requirements	Policy 3.3.4	Form 3	2			Oppose all amendments to Policy 3.3.4. The amendments will place unreasonable standards on cycle trails that are much higher than those imposed on new walking tracks under Policy 3.2.3. Amendments have not been sought by the cycling community. There is no evidence the current policy is not fit for purpose. The proposed wording is inconsistent with other CMS.	No relief specified, but presumably delete this policy.	Reject See standard response.
Specific Policy Requirements	Policy 3.3.4	Form 3	3			Support removal of 'should follow the statutory review process' from Policy 3.3.4. This clause is unnecessary and is not justified in terms of the CGP. It is the reason for the current CMS review and is wasting valuable time and resources on all sides.	No relief specified, but presumably remove the requirement to follow this process from the CMS.	Reject See standard response.
General	general comments	Form 3	4		Use of section 53(2)(j) of the Conservation Act	DOC has recently used their 'powers' under CMS Policy 3.2.3 and the Director General's approval under section 53(2)(j) of the Conservation Act to approve the construction of a road and car park at Bennett's Bluff on the Glenorchy Road. As an	DOC should apply its powers consistently and approve the national cycle trails already funded and awaiting construction.	Reject See standard response.
Places	Discussion Box - Kidds Bush Loop Trail and Maungatika Trail	Form 3	5		Kidds Bush and Maungatika Trail	Support for the proposed Kidds Bush and Maungatika tracks in Hawea Conservation Park. Maungatika track concept is similar to Papanoa Great walk. Will create a world class multi day single track of high environmental standards. Will also improve access for hunting. Fully funded by private partners. Support the Kidd's bush loop track. The Hawea Conservation area is a vast and diverse area and bike trails should be discussed subject to the test in policy 3.3.	not specified but include in table 2.2	Accept Individual tracks are no longer listed in the Tables, the Tables now identify where biking and the consideration of bike tracks can occur. This is to avoid confusion where a specific track may have more than one name. Proposals will be considered and the policies in Section 3.3 applied.