

# Evaluating public input in National Park Management Plan reviews

Facilitators and barriers to meaningful  
participation in statutory processes

SCIENCE FOR CONSERVATION 308



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*Te Papa Atawhai*

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## Facilitators and barriers to meaningful participation in statutory processes

Mariska Wouters, Ned Hardie-Boys and Carla Wilson

SCIENCE FOR CONSERVATION 308

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# Evaluating public input in National Park Management Plan reviews

## Facilitators and barriers to meaningful participation in statutory processes

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### ABSTRACT

This study set out to evaluate the effectiveness of public participation in the New Zealand Department of Conservation's (DOC's) statutory planning processes, and to identify any constraints to effective participation and areas that could be improved. The evaluation focused on six recent statutory review processes—five National Park Management Plans and one Conservation Management Plan. The study used a mixed methods approach and this report presents the findings from a review of DOC's statutory requirements and its practices, a survey of submitters to recent management plan reviews, and stakeholder and staff interviews. The Public Participation Spectrum developed by the International Association for Public Participation was used as the underlying framework for public input. Nine evaluation criteria were developed and applied—representativeness, influence, purpose and decision-making, timeliness, early involvement, feedback, information, effective forums, and enabling process. The study found that participants were generally satisfied with the consultation opportunities provided, and the ability to provide written submissions was strongly supported. Current participants represent a core constituency of experienced people who participate well in the planning processes and, on the whole, the methods used suit these people. Those who are currently engaged are not representative of New Zealand society. Main constraints to public participation were the lengthiness of the review processes, lack of feedback provided to participants, under-representation of certain interest groups and the general public, and unclear definition of objectives for involving the public in each review. Recommendations are that DOC actively plans for public input, broadens public and interest group representation, involves the public as early as possible in these processes, provides regular feedback, and reduces the timeframe for the plan review process.

**Key words:** best practice, constraints, effectiveness, engagement, evaluation, facilitators, national park management plan, public participation, stakeholder consultation, statutory planning, New Zealand

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# 1. Outline of study and objectives

## 1.1 INTRODUCTION

The Department of Conservation (DOC) engages in public consultation as part of its statutory planning processes under the Conservation Act 1987, National Parks Act 1980, and the Reserves Act 1977. It has recently undertaken a number of National Park management plan reviews, and at present, is embarking on an intensive period of consultation on Conservation Management Strategy (CMS) reviews. These strategies will set the conservation management direction for DOC's 12 conservancies for the next 10 years, and will have a different structure than previous CMSs; in particular, there will be a large emphasis on understanding people's values for places. Ensuring these reviews reflect public needs and expectations will require effective consultation processes.

There has been growing pressure from key stakeholders for DOC to engage in consultation on its management plans and conservation management strategies, and to improve its consultation practices. Questions have been raised by these stakeholders as to whether DOC's existing public processes are too restrictive in terms of encouraging effective public input. At the same time, there is concern that while there may be increased awareness by some of the public for the need to be involved in these processes and for their views to be appropriately heard and considered, few people actually make the effort to become involved. It is unclear whether DOC's current processes are enabling sufficient public input or are likely to be able to meet future management planning needs.

The last objective evaluation of DOC's public consultation as part of its statutory planning reviews was carried out in 1990 (James 1990). It is therefore timely to undertake an evaluation of current practice.

The Conservation Act 1987 and the National Parks Act 1980 describe mandatory processes which include public notification of the intent to prepare, amend or review plans, and which enable public submissions and hearings on draft plans. The purpose of this study is to evaluate the effectiveness of public input in these processes, to identify any constraints to effective participation, and any areas where things could be improved.

As this study looks specifically at public input to DOC's statutory management planning processes, it applies DOC's definition of consultation as prescribed in its General Policies (further described below) which implement the conservation legislation (DOC 2005: 54; NZCA 2005: 62). Therefore, the underlying definition for consultation / public input in this study is:

*... an invitation to give advice, and the consideration of that advice. To achieve consultation, sufficient information must be supplied and sufficient time allowed by the consulting party to those consulted to enable them to tender helpful advice. It involves ongoing dialogue. It does not necessarily mean acceptance of those views, but it enables informed decision-making by having regard to those views.*



## 1.2 OBJECTIVES

The two main objectives of this research were:

- To identify facilitators and constraints that affect public input to DOC's statutory management planning processes
- To provide guidance to improve the practice of public consultation in DOC's statutory planning processes

This research used a mixed methods approach comprising a survey of submitters to six management plan reviews, and interviews with submitters, staff, and members from Conservation Boards and the New Zealand Conservation Authority. This report does not provide a complete evaluation of each management plan review. Rather, it gives insight into the facilitators of, and constraints to, public input, and uses the collective information from the six reviews to inform improvement and the recommendation of 'best practices'. Issues identified from these reviews are likely to be pertinent to other statutory management plan reviews. For that reason, it is anticipated that the report will help DOC staff, the New Zealand Conservation Authority (NZCA) and Conservation Boards better understand the barriers and opportunities to effective public input to DOC's statutory planning processes, and will contribute to improving processes to provide effective public participation.

It was beyond the scope of this study to include those people who did not engage with the review processes. This study formed part of a three-pronged approach to improving DOC's consultation practices associated with its statutory management planning processes. In addition to this evaluation, a separate study was undertaken to improve the way DOC plans for and seeks public input into the review of statutory management plans<sup>1</sup>, and public participation training, through the International Association of Public Participation, was made available by DOC to a number of its staff.

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<sup>1</sup> Pattillo, A.; Wouters, M. 2010: Engagement story report. Department of Conservation. Wellington.

## 2. Review of existing information

This section is divided into three main parts. The first considers the statutory requirements for public input in DOC's planning processes and current practice guidance available to staff. This is followed by a summary of findings from previous studies which examined the effectiveness of public input in DOC's statutory planning processes. In the third part, internationally-recognised principles for public participation are then briefly described to help place DOC's approach to public input in its statutory management plan processes. Based on the information described in the three parts of this section, a series of evaluation criteria are developed to guide the study.

### 2.1 THE DEPARTMENT OF CONSERVATION'S OBLIGATIONS

#### 2.1.1 Statutory basis for consultation

The Conservation Act 1987, the National Parks Act 1980 and the Reserves Act 1977 prescribe statutory processes which require public consultation<sup>2</sup>. While this legislation does not include a definition of public consultation or participation, it prescribes the process to be followed to enable the public to formally have input. The processes that are specifically considered in this study are those set out for Conservation Management Plans (CMPs) and National Park Management Plans (NPMPs), but the issues are equally relevant to Conservation Management Strategies (CMSs)<sup>3</sup>.

CMSs, CMPs and NPMPs are all 10-year planning mechanisms. Under the Conservation Act (s17D), DOC is required to prepare CMSs for all areas it administers, and all natural and historic resources covered by its responsibilities—there are 17 CMSs covering the whole of New Zealand. The Conservation Act (s17E) also provides for CMPs, which are detailed plans for particular sites. They are designed to achieve the goals set out in CMSs and are required only if specifically mentioned in a CMS. Under the National Parks Act 1980 (s45), each of New Zealand's fourteen national parks has to have a management plan (i.e. a NPMP). Since 2003, six NPMPs and one CMP have been reviewed and approved, while three further NPMPs were under review at the time of this study.

In 2005, two general policies were introduced to help implement the conservation legislation. The Conservation General Policy provides policy for the implementation of a number of Acts<sup>4</sup>, and also provides guidance for consistent management planning, including the preparation of CMSs and CMPs. The purpose of the General Policy for National Parks is to implement the National Parks Act

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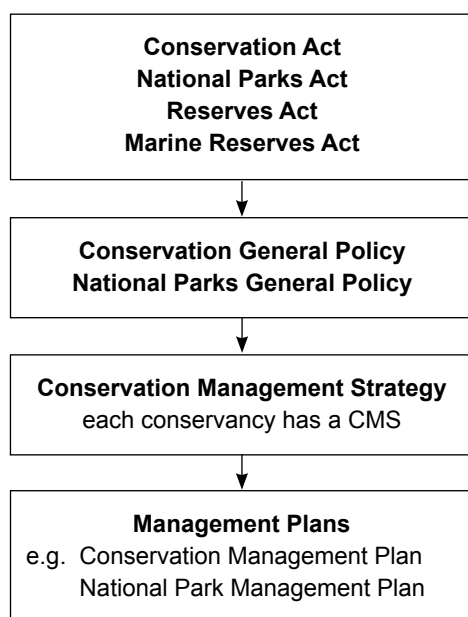
<sup>2</sup> There are also legal requirements to consult when preparing CMSs and CMPs under the Marine Reserves Act 1971 and the Marine Mammals Protection Act 1978, but these processes do not form part of this study.

<sup>3</sup> At the time of this study, there were no recent CMS reviews available for assessment.

<sup>4</sup> Conservation Act 1987, Wildlife Act 1953, Marine Reserves Act 1971, Reserves Act 1977, Wild Animal Control Act 1977, Marine Mammals Protection Act 1978.

and to provide consistent national direction for the administration of national parks through CMSs and NPMPs. The hierarchy of these three types of planning documents is shown in Fig. 1. It is in a CMS that the two general policies are addressed together and establish objectives for the integrated management of natural and historic resources managed by DOC.

Figure 1. Statutory framework for management of public conservation land. Based on figure in DOC & NZCA (2006: 6).



The key consideration here is that the statutory planning documents are required to implement, and cannot derogate from, these general policies. The general policies require public input into the statutory planning processes to provide an opportunity to canvass a wide range of public opinion and strengthen cooperative relationships, and that the public **will** be consulted. The General Policy for National Parks states that DOC 'will consult the relevant Conservation Board and tangata whenua and seek written comments from, and have regard to the views of, interested people and organisations' (NZCA 2005: 57). For CMSs and CMPs, the Conservation

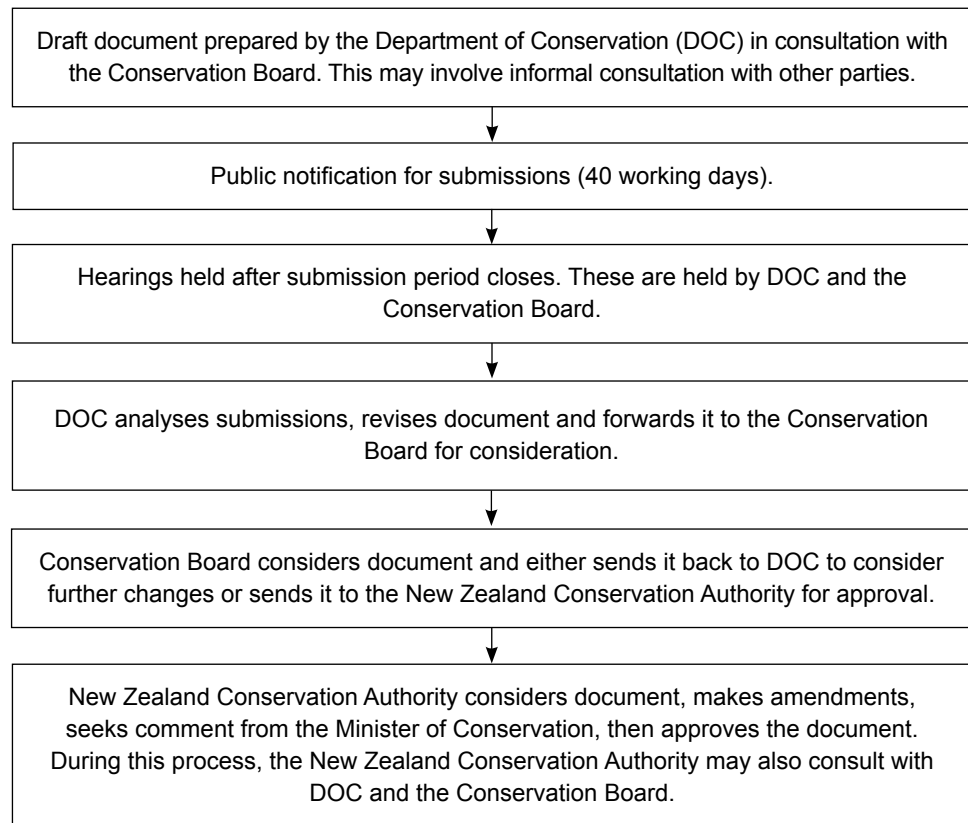
General Policy states: 'Conservation Boards, people or organisations interested in public conservation lands and waters, including fish and game councils and tangata whenua, will be consulted when developing or reviewing conservation management strategies and plans' (DOC 2005: 49). The general policies also provide a definition for consultation, as referred to in Section 1.1.

In relation to Māori, section 4 of the Conservation Act requires that all persons exercising functions and powers under this Act give effect to the principles of the Treaty of Waitangi. A duty to consult is one of these key principles. Where there is inconsistency between the provisions of the conservation legislation and the principles of the Treaty, the provision of the Conservation Act will apply (DOC 2005). In terms of DOC statutory planning processes, both general policies require that Māori will be consulted when statutory planning documents are being developed (DOC 2005; NZCA 2005).

The statutory obligations describe a mandatory process which includes public notification of the intent to prepare, amend or review plans, and seeking public submissions on draft plans. The processes for CMS, CMP, and NPMP reviews are very similar in terms of when public input into the statutory planning cycles is sought. The CMS and CMP review process has two and the NPMP process has three formal opportunities for public views, solutions and ideas to be put forward to help shape a strategy or plan. Figure 2 shows a summary of the planning process while Appendix 1 contains a description of the full process for the preparation and review of NPMPs and CMPs.

Under the NPMP process, DOC has to publicly notify its **intention** to review in local and national newspapers, and thereby invite interested parties to send in their views. This is not a statutory requirement for the CMS or CMP process but is

Figure 2. Summarised planning process.



generally considered best practice (DOC & NZCA 2004b). This requirement gives the public the opportunity to provide input prior to the drafting of the plan. All three planning processes require public notification inviting people to put forward a written submission on the draft plan or strategy, as well as reasonable opportunities for people to speak to their written submission.

The Conservation Act has prescribed timeframes for the CMS and CMP processes—from the date of notification to when the plan is forwarded to the Conservation Board is set at 14 months. The Conservation Board has 6 months to forward it on to the NZCA. The Minister of Conservation can grant extensions to these timeframes if requested. It does not prescribe a timeframe for the NZCA part of the process. The National Parks Act does not provide any statutory timeframes, except for a minimum period of 2 months required for seeking written submissions on the draft NPMP.

The main decision-making bodies involved in the statutory planning process are DOC, the relevant Conservation Board, and the NZCA. The planning documents are prepared by DOC, and then forwarded to the conservation boards after public consultation and revision. The conservation boards have multiple roles; they are actively involved in the preparation, review, and amendment of CMSs and NPMPs; and often approve CMPs. The NZCA is the final decision-maker for CMSs and NPMPs, and it may approve CMPs, although this is usually done by conservation boards (DOC & NZCA 2006; DOC 2008).

The statutory process does not have a requirement to provide feedback to submitters and other members of the public on how submissions or public opinion was addressed. There is, however, a legal requirement for DOC to do the following:

- For CMSs and CMPs, DOC must prepare a summary of submissions and/or public opinion known and provide this to the Conservation Board (Conservation Act s17F(h)). The Conservation Board is required to send this to the NZCA (Conservation Act s17F(k)(ii)).
- For NPMPs, the Conservation Board must send a summary of submissions received to the NZCA and a statement of the extent to which submissions were accepted (National Parks Act s47(6)).

There is no obligation to provide this information to the public (unless requested).

The legislation does not provide for a review or appeal process for the decision. If a submitter does not agree with the outcome of the process, he or she can seek judicial review on process<sup>5</sup>, or complain to the Ombudsman.

### 2.1.2 Management planning practice guidance

Over time, DOC has produced a number of tools for use by management planners to guide the practice of involving the public in the statutory planning process. These include:

- Consultation Policy and Consultation Guidelines (DOC 1999a, b)
- CMS Standard Operating Procedure (SOP) (DOC & NZCA 2004a)
- CMS Best Practice Manual (DOC & NZCA 2004b)
- CMS Structure and Content Guidance (DOC 2006a)
- Te Kete Taonga Whakakotahi (2006)

Management planners can refer to DOC's Consultation Policy and Consultation Guidelines (DOC 1999a, b). These complementary documents explain that DOC consults to get more information to help make better decisions, and to meet DOC's legal obligations under legislation (including section 4 requirements of the Conservation Act). It uses the following definition for consultation:

*Consultation is a stage in the decision-making process where the Department seeks community and tangata whenua views on issues and proposals. The Department of Conservation keeps an open mind about the final decision it might make, and makes its final decision after consultation has been completed. It may end up keeping its preferred option, but will be able to justify clearly why. The Department will have informed the community and tangata whenua of the problem, issues and options, and will keep the flow of information open throughout the consultation process. (DOC and NZCA 2004a: 14)*

Where legislation specifies the way consultation shall be undertaken, such as for CMSs and NPMPs, the statutory process takes precedence over this Consultation Policy.

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<sup>5</sup> Meredith Connell (2006) defines judicial review as follows: 'Judicial review may be brought against any person or entity (usually a government or quasi-government body) that has exercised a statutory power. The typical case involves a plaintiff who has been affected by a government decision and wishes to challenge the way in which the decision was made'.

In 2004, DOC introduced a Standard Operating Procedure (SOP) for CMSs<sup>6</sup>. The purpose of CMS consultation is 'to meet statutory requirements for consultation with stakeholders in the CMS preparation process' (DOC & NZCA 2004a: 14). The SOP identifies the various steps in the CMS process that require consultation. When embarking on a statutory review process, each conservancy is expected to identify the specific goals for public involvement for that particular process.

An accompanying Best Practice Manual (DOC & NZCA 2004b) was produced to be used in conjunction with the CMS SOP, and provides a template for a consultation plan. It identifies two stages of public consultation—when the CMS is at the pre-draft stage before the draft is ready for official public release (non-statutory), and then once the draft has been released for the formal submission-making stage (statutory). This is not the same for the NPMP process. Feedback is expected to be provided to all participants in the consultation process, which should acknowledge where their views were considered and accepted or, if declined, an explanation for the decline. Department of Conservation staff are expected to be open to new ideas, run an efficient process, get the best information from the community, consult well with tangata whenua, and complete the consultation process through feedback and evaluation. The consultation process is also expected to provide sufficient time for effective and meaningful exchange of information between parties. The SOP also includes a module to evaluate the process used.

While the general policies (Section 2.1.1) require that **the public** will be consulted, the key groups for consultation identified in the Best Practice Manual are (DOC & NZCA 2004b):

- Tangata whenua
- Communities
- Regional and District Councils
- Non-government organisations
- Historic Places Trust
- NZ Fish and Game Council
- Farming/rural sector interests
- Commercial/marine interests
- Tourism industry
- Research institutes

These groups represent stakeholder interests rather than the wider public.

While aimed at the public, a booklet released in 2006 by the NZCA (DOC & NZCA 2006: 9) about DOC's statutory consultation processes is also a useful guide for staff. The purpose of this guide is to assist the public to become involved in DOC's planning processes, and clearly sets out the legislative requirements, and how the public can effectively engage in the process.

Conservation Management Strategy guidelines were approved in 2006 to guide the drafting of future CMSs (DOC 2006a) and a CMS framework (template) was developed in early 2008. These documents aim to provide consistency across DOC in terms of structure and content of CMSs and may benefit public input.

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<sup>6</sup> At the time of writing, there are no SOPs or practice guidelines for national park management planning, although DOC staff are encouraged to refer to the CMS support information.

## 2.2 FINDINGS FROM PREVIOUS STUDIES

Even allowing for the fact that management plans have a long life (10 years), it has been a significant number of years since previous studies were conducted. James (1990), Airey (1996), and CRESA (1998) each examined aspects of the effectiveness of public input in DOC's statutory consultation processes. This section summarises the findings of these studies in relation to the purpose for seeking public input, their key findings, and their recommendations to DOC on how to improve public input.

James (1990) investigated participants' views and experiences in the Tararua Forest Park and the Tongariro National Park management plan review processes in 1989. This study arose from a major review of DOC's management responsibilities in 1989 during which the Task Group on Management Planning (1989, cited in James 1990: 3) identified a number of public participation issues for DOC, particularly that there was a need to take account of public opinion and incorporate it into plans, and that there should be development of public consultation and participation procedures. The purpose of James' research was therefore to provide information that DOC could use to develop more effective public participation procedures. The research examined what the public wanted from participating, and how effective the public thought the exercise was. James (1990) surveyed all individuals and organisations that had made submissions to the two reviews, asking about their experience of the process.

Airey (1996) examined the effectiveness of public consultation in eight CMSs developed during the period 1992-1996. The study categorised respondents (by sector group, gender, locality, method of response), summarised the main issues expressed by them, and summarised the consultation processes used in the CMSs.

CRESA (1998) undertook an independent review of DOC's community consultation following the restructuring of DOC in 1997. The purpose of the study was to assess DOC's community conservation approaches and processes, particularly in relation to the development of CMSs and concession allocations. The study identified strengths and weaknesses of past consultation processes, as a basis for making recommendations for improving DOC's consultation procedures, processes, and structures.

### 2.2.1 Purpose of public input

James' (1990) study used a broad definition for public participation: *public participation is any action taken by an interested public (individual or group) to influence a decision, plan or policy beyond that of voting in elections* (James 1990: 2). Airey (1996) did not identify the purpose of public consultation in DOC's statutory processes or any criteria for measuring effectiveness. CRESA (1998) described when consultation is required in DOC, and identified approaches to consultation, but did not provide a definition of consultation.

Both CRESA (1998) and James (1990) found that DOC consults because it is a legal requirement and also to gain support for conservation. The Department has a mandate to advocate for the conservation of all natural and historic resources—it must therefore promote community awareness and understanding of conservation, including public participation in management processes.

James (1990) also stated that, as DOC is responsible for such a large portion of New Zealand's natural and historic resources, its management will affect the well-being of the public. CRESA (1998) found that DOC consults to achieve conservation outcomes, but that there appeared to be confusion between consultation and public relations.

### 2.2.2 Barriers and facilitators found

James (1990) identified general support for public participation procedures and that the existing process had a number of strengths<sup>7</sup>. In general, participants considered they had been given adequate opportunity for involvement in management planning. Organisations were more satisfied than individual participants with the scope of opportunities provided. There was strong support for submission-making as the primary method of participation; however, many respondents did not want to be limited to submission-making only, especially if there was only one opportunity to make a submission on the draft plan. Māori were least likely to feel that their views were expressed in management planning. There was strong support for DOC providing a discussion paper early in the process, and there was further support for participation at the early stage of forming a plan. The majority of respondents were satisfied with the way their views had been received by DOC. People particularly supported the opportunity to meet staff in informal settings, to enable a direct exchange of views and information. Public meetings were valued as a way of obtaining information from DOC and other parties, but they were considered less successful as a means of influencing staff. The main satisfaction people gained from being involved in the process was the opportunity to express their views and concerns directly to DOC. Some participants also identified increased awareness and understanding of conservation issues as benefits from the consultation process. Public participation also provided opportunities for DOC to advocate conservation and develop stronger links with the community.

Airey's (1996) study showed that individuals were the largest group of submitters (by number), and that submitters were mainly men and from urban areas (except in Southland and Waikato, where submitters were mainly from rural areas). Most submitters were local, except those for the Tongariro/Taupo and East Coast CMSs. The largest sector represented amongst submitters was recreation groups, followed by iwi/hapu, environmental groups, business and State Owned Enterprises (SOEs), who all provided a similar number of submissions. There were low levels of submissions from concessionaires, women's groups, and scientific groups. Some sectors (particularly recreational hunters, concessionaires, and iwi) felt they were not involved enough in the process of developing CMSs, and found the consultation process to be inadequate or inappropriate. Airey (1996) concluded that the CMS submission process was an effective consultation mechanism for some sectors and organisations, but that iwi, women, and some other sectors were under-represented. Barriers to participation included timing, lack of information, lack of resources, lack of faith in the process, and inaccessibility of the planning document.

CRESA (1998) found a number of good examples of current practices, but also that the public wanted a wider range of consultation techniques (in addition to written submission and oral presentation). In terms of encouraging public input,

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<sup>7</sup> It needs to be remembered that these are the views of those who participated in the process.



the study raised the question of who is responsible for ensuring all parties have an opportunity to comment, and how. Participants reported that submissions by individuals and organisations were treated differently. CRESA (1998) identified more than ten factors that were seen to be barriers to participation. These included time and resources, staff skill levels, the complexities of resource management, and alleged staff sympathy (or lack of) with particular groups or individuals. Prerequisites for effective consultation that were identified included: communication skills amongst staff, administrative support within DOC, flexible interpretation of management plans, and sufficient resources. Consultation issues for Māori were particularly highlighted.

### 2.2.3 What was recommended

All three studies identified a number of areas for improvement which can be grouped as follows:

1. **Representation**—more effort is needed to ensure all groups and sections of the community with interests in the area under review are involved, particularly to ensure that the views of iwi are taken into account and that iwi are involved in designing the consultation process.
2. **Information dissemination**—information to help people participate is needed (e.g. summaries of the draft plan, the submissions process, who to contact etc.), as well as feedback from DOC to ensure that participants are kept informed during the review process and, once the formal participation opportunities are over, of how their views influenced the final outcome of the process.
3. **Consultation techniques**—techniques appropriate to the audience should be used, e.g. visual presentations, display caravans, slide shows to stakeholder groups, workshops, discussion forums (with comments incorporated as oral submissions), and less-formal meetings prior to consultation.
4. **Skilled staff**—a range of staff need to be involved, with appropriate consultation and information analysis skills.
5. **Influence**—participants wanted to be certain that their input made an appreciable difference to the content and direction of the plan and that ideas were competently assessed and reasons for decisions made explained. It is important for DOC to ensure that input from people outside the traditional stakeholder groups is valued and incorporated into decision-making.
6. **Non-participation**—there are sections of the population that do not participate in DOC's management planning processes, and DOC needs to identify the disincentives and barriers that limit public participation.

James (1990) and CRESA (1998) also highlighted some overarching strategic issues. Both recommended that DOC needs to resolve the appropriate extent of public influence in its management planning, and that there is a need for carefully planned consultation frameworks to underpin each consultation process. As there are many 'publics', a variety of participation opportunities appropriate to the situation and to the planning objectives must be offered. In addition, both studies emphasised the need for DOC to better understand the benefits of consultation in achieving conservation outcomes: as the primary goal of management planning is care and protection of the natural and historic environment, a plan's success must be judged on how the public participation procedures help to achieve conservation objectives.

## 2.3 PRINCIPLES OF PUBLIC PARTICIPATION

The context for this study is the statutory requirement for public consultation in DOC's planning processes, and the effectiveness of such input. As noted above, this statutory requirement is not the only reason for involving the public. The areas of land protected and managed by DOC are public assets, and public participation is seen as essential to ensuring that they are properly managed and strongly supported by the public (CNPPAM 2002). It is therefore important to understand public input and participation beyond the definition of consultation provided in DOC's general policies.

### 2.3.1 Spectrum of public participation

The International Association of Public Participation (IAP2 2006:5) describes public participation as *any process that involves the public in problem solving or decision making and uses public input to make decisions*, with public defined as *any individual or group of individuals, organisation or political entity with an interest in the outcome of a decision* (IAP2 2006: 5). The public may actually be (or perceive that it may be) affected by the outcome of a decision, directly or indirectly.

There are different levels of public participation in decision-making. A number of spectrums have been designed to assist in selecting the right level of participation and establishing the public participation goal, to ensure that the benefits of involving the public are maximised (e.g. IAP2 2006; OCVS 2008).

This study uses the spectrum and principles put forward by the IAP2. Figure 3 shows that at the left of the spectrum, the public is simply provided with information. The next two levels of 'consulting' and 'involvement' include formal consultation on specific issues, in which views are considered but the final decision is made by those consulting. At the most devolved end of the spectrum, 'collaborate' and 'empower' require a higher level of co-operation, shared goals, and joint decision-making.

Public participation in DOC's statutory planning processes will typically be in the 'inform' and 'consult' areas of the spectrum and, from time to time, the 'involve' region, depending on a conservancy's planning issues. The statutory requirements firmly place decision-making in such planning processes with DOC. It is important to note here that applying the IAP2 spectrum does not derogate from the general policies' definition of consultation nor DOC's statutory management planning processes but, rather, that it enables a clearer understanding of the purpose of seeking public input.

Effective public participation is driven by properly understanding the goals and objectives of the role of the public and the level and purpose of its input. Involving the public does not mean that the agency making final decisions abdicates responsibility (IAP2 2006). It should mean that the agency develops a plan for effective engagement that clearly identifies proper responsibilities, that supports the agency's and the project's or policy's purpose, and creates a way for productive participation by the public.

### 2.3.2 Benefits and disadvantages of public participation

Public participation has many benefits (PWCNT 2002; IAP2 2006); some are shown in Table 1. The main aim of public participation is to encourage the public **to have meaningful** input into the decision-making process. Public participation thus provides the opportunity for communication between agencies making decisions and the public. This communication can be an early warning system for public concerns, a means through which accurate and timely information can be disseminated, and can contribute to sustainable decision-making (IAP2 2006). These benefits apply when public participation is a two-way process—where both the agency and the public can learn and gain benefit (PWCNT 2002; IAP2 2006). Effective public participation allows the public’s values to be identified and incorporated into decisions that ultimately affect them (Johnson 2001; PWCNT 2002; IAP2 2006).

While there are numerous advantages associated with public participation in planning and decision-making processes, there are also disadvantages (MfE 1999; PWCNT 2002). Public participation can be time-consuming and sometimes expensive. To do it effectively, organisations have to build capacity and train staff. If done poorly, public participation processes can result in, for example, loss of faith in the agency. A negative experience of the process may lead participants to have negative perceptions of the outcome, and they may be less likely to participate in future processes.

Figure 3. Public Participation Spectrum. Based on figure in IAP2 (2006: 35).

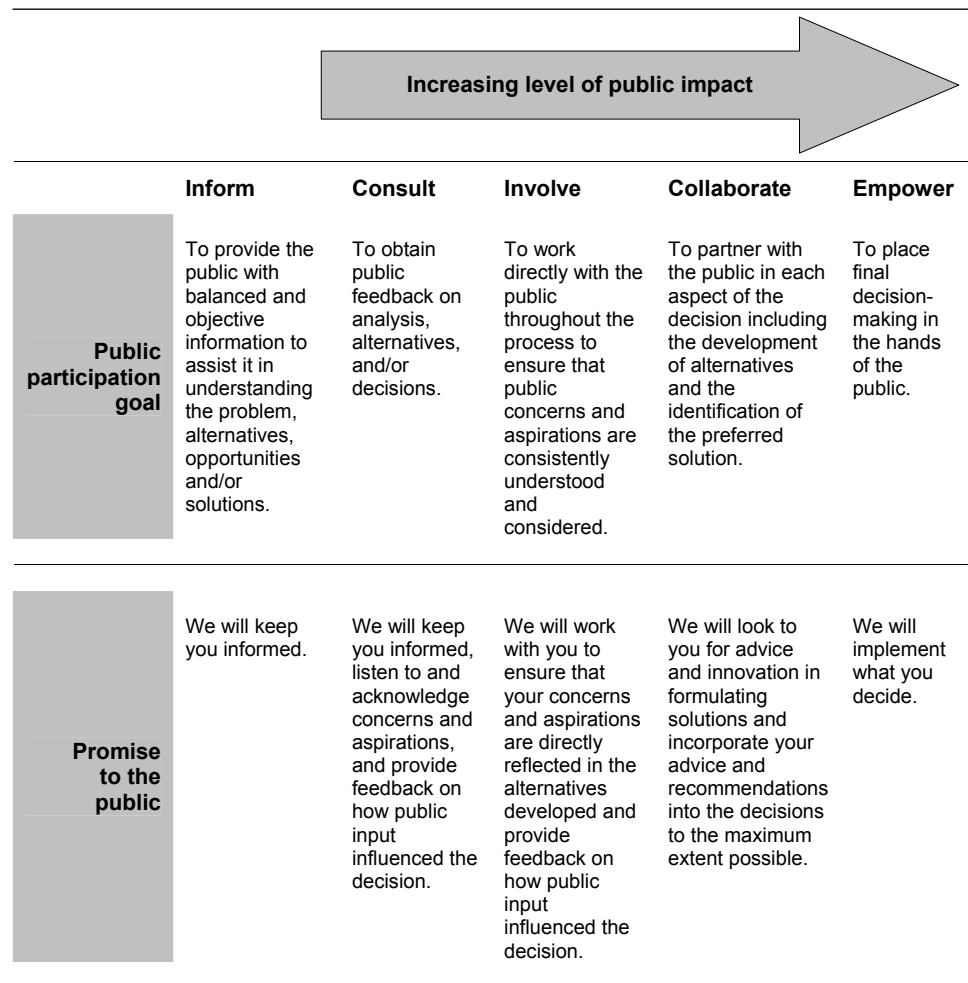


TABLE 1. BENEFITS OF PUBLIC PARTICIPATION, FROM CNPPAM (2002).

- 
- Improved understanding of client expectations and user group needs
  - Improved agency understanding of conservation issues
  - Improved agency understanding of the role and contribution of the community
  - Greater continuity in knowledge
  - Ability to build community support for a project and to improve stakeholder relationships
  - Improved public understanding of the agency's responsibilities
  - Improved staff and community technical knowledge
  - Improved agency credibility within the community
  - Improved quality of decision-making by agencies
  - Enhancement of social capital and flow-on social and economic benefits
  - Enhanced and informed political process
  - Greater compliance through increased ownership of a solution
  - Greater community advocacy for biodiversity protection
  - Greater access to community skills and knowledge
  - Improved community understanding of conservation issues and responsibility for conservation outcomes
- 

### 2.3.3 Principles for public participation

A number of authors have developed principles for public participation. This section briefly describes these, from the general principles for public participation (**should**) to the specific principles (**must**) relevant to consultation in New Zealand and in DOC.

The IAP2 (2006) produced a set of core principles for the practice of public participation. These principles are:

- The public should have a say in decisions about actions that could affect its members' lives
- Public participation includes the promise that the public's contribution will influence the decision
- Public participation promotes sustainable decisions by recognising and communicating the needs and interests of all participants, including decision-making agencies
- Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision
- Public participation seeks input from participants in designing how they participate
- Public participation provides participants with the information they need to participate in a meaningful way
- Public participation communicates to participants how their input affected the decision

Best practice principles for public participation in protected area management, as shown in Table 2, formed part of the Benchmarking and Best Practice Program for the Committee on National Parks and Protected Area Management in the Northern Territory, Australia (PWCNT 2002).

Ronmark (2005) developed a suite of principles for measuring the process, outcome, and implementation of management planning processes in British Columbia's parks and protected areas. Ronmark considered that successful consultation should be fair, efficient, and informative. Public participation

TABLE 2. PRINCIPLES OF BEST PRACTICE IN PUBLIC PARTICIPATION, FROM CNPPAM (2002).

- 
- Public participation is an integral component of protected area management
  - Agency's seeking involvement of the public need to be open and clear about the extent of involvement intended in order to avoid creating false expectations
  - Public participation programmes should recognise the diversity of values and opinions that exist within and between communities
  - Good programme design is crucial to the success of public participation programmes
  - Specialised public participation techniques and training are required for programmes to succeed
  - The information content of public participation programmes should be comprehensive, balanced and accurate
  - A public participation programme should be tailored to suit the situation at hand
  - A public participation process requires adequate time and resources—successful outcomes may be undermined where these are lacking
  - Agency staff should be skilled in public participation design and processes
  - The community should be consulted about public participation design and process before the agency finalises its approach
  - To address the needs of specific groups, special participation techniques are required
  - Public participation programmes should aim to capture the full diversity of people within a community—not only people that are the most publicly active or socially capable
- 

should occur at an early stage, all interested and affected people should be represented, and public input should be used in the development and evaluation of alternatives. Ronmark states that the process should involve shared decision-making. Stakeholders should be able to participate on an equal basis with administrative officials and technical experts.

Along similar lines to Ronmark (2005) above, Johnson (2001) considered principles for public involvement in environmental impact assessment (EIA) in New Zealand under the Resource Management Act 1991 (RMA). The key principles that this study considered to be imperative were:

- The public is involved early in the process
- The full spectrum of opinions and values is exposed
- Forums for participation are effective
- Issues of concern to the public are taken into account in reaching a decision
- The experience is positive.

The concept of consultation has also been interpreted in New Zealand case law. Of particular relevance is the 1991 Wellington International Airport Ltd v. Air NZ (Court of Appeal) case, which is significant in terms of consultation (MfE 1999; Quality Planning 2008). This case demonstrated that consultation is not merely telling or presenting, nor should it be a charade, nor is it the same as negotiation—although a result of consultation could be an agreement to negotiate. This case identified a number of elements of consultation that can be summarised as including the following principles (Quality Planning 2008):

- Consultation is the statement of a proposal not yet finally decided upon.
- Consultation includes listening to what others have to say and considering responses.
- Sufficient time must be allowed for the process and a genuine effort made
- The party obliged to consult must make available enough information for the consultee to be adequately informed and able to make intelligent and useful responses.

- The party obliged to consult must keep its mind open and be ready to change and even start afresh. However, the consulting party is entitled to have a working plan already in mind.
- Consultation is an intermediate situation involving meaningful discussion.
- The party obliged to consult holds meetings, provides relevant information and further information on request, and waits until those being consulted have had a say before making a decision.

The definition of consultation in DOC's general policies (Section 1.1) also provides a set of principles for best practice (DOC 2005; NZCA 2005). The principles include that DOC must:

- Provide sufficient information and time
- Enable ongoing dialogue
- Provide confidence that people's views are considered
- Provide an enabling process
- Invite people to participate

### 2.3.4 Evaluation criteria

Based on DOC's statutory obligations, findings from previous studies, and the principles described above, the following nine evaluation criteria have been developed to measure the effectiveness of public participation in DOC's statutory planning processes. The criteria are summarised in Table 3.

#### Criterion 1: Representation

The people that participate in a consultation process must comprise a broadly representative sample of the affected public. This means that all parties with an interest in the issues and outcomes of the process are involved throughout the process. A sound process ensures that the full spectrum of the opinions and values held by the public is exposed.

TABLE 3. SUMMARY OF EVALUATION CRITERIA.

CRITERION	DEFINITION
1. Representation	Public participation must comprise a broadly representative sample of the population of the affected public.
2. Influence	Issues of concern to the public, and relevant to the decision at hand, must be taken into account in reaching a decision.
3. Timeliness	Realistic milestones and deadlines must be managed throughout the process.
4. Purpose and decision-making	The participation process must be driven by a shared purpose, with the nature and scope of the participation task clearly defined.
5. Early involvement	The public must be involved early. This involvement extends onwards throughout the planning process.
6. Effective forums	The public must be able to participate in an effective forum. A variety of techniques is used to give and receive information, including face-to-face discussion between parties.
7. Information	Public participation provides participants with the information that they need to participate in a meaningful way.
8. Enabling process	The process for public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
9. Feedback	The public participation process communicates to participants how their input affected the decision.

**Criterion 2: Influence**

Issues of concern to the public, and relevant to the decision at hand, must be taken into account in reaching a decision. Public input is used in the development and evaluation of options and public contribution has a genuine impact on the decision. It is important to ensure that stakeholder and public participation is, as much as possible, on an equal basis with that of the administrative officials and technical experts (within legal constraints). Public input in DOC's statutory planning process cannot extend to decision-making owing to the restraints of the legislation (see Section 2.3.1 on spectrum).

**Criterion 3: Timeliness**

Realistic milestones and deadlines must be applied throughout the process, including allowing sufficient time for meaningful consultation with iwi.

**Criterion 4: Purpose and decision-making**

The participation process must be driven by a shared purpose, with the nature and scope of the participation task clearly defined. This includes ensuring that the process is transparent so that the public can see what is going on and how decisions are being made. Procedural ground rules and roles of the participants must be clearly defined. A right of appeal is not included as a principle as this is not possible under current legislation.

**Criterion 5: Early involvement**

The public must be involved early in the planning process and this involvement must continue throughout the whole process (i.e. in the development of the plan, and in consulting on the draft plan).

**Criterion 6: Effective forums**

The public must be able to participate in an effective forum. A variety of techniques are used to give and receive information, including face-to-face discussion between parties.

**Criterion 7: Information**

Public participation provides participants with the information they need to participate in a meaningful way. High quality and understandable information is available.

**Criterion 8: Enabling process**

The process for public participation seeks out and facilitates the involvement of those people and groups potentially affected by or interested in a decision. It seeks input from participants on how they wish to participate (i.e. the process for providing input is not prescribed by the agency alone). The process provides for equal and balanced opportunities for all parties to participate effectively. The participation process is conducted in an independent, unbiased way.

**Criterion 9: Feedback**

The public participation process keeps participants informed of progress, and communicates to participants how their input affected the decision.

## 3. Methodology

### 3.1 INTRODUCTION

The evaluation considered six statutory management plan review processes, which had either recently been completed (i.e. the plans had been approved by the NZCA), or for which the public involvement part of the process had been completed (i.e. the written submission and hearing stages had been concluded). The six reviews included are:

- Abel Tasman National Park Management Plan
- Arthur's Pass National Park Management Plan
- Fiordland National Park Management Plan
- Kaimanawa Forest Park Conservation Management Plan
- Tongariro National Park Management Plan
- Whanganui National Park Management Plan

### 3.2 MANAGEMENT PLAN REVIEW CONTEXTS

The six reviews provide a useful range of processes and situations, with the study parks ranging from a small forest park frequented by hunters and primarily New Zealand back country trampers (Kaimanawa Forest Park), through to New Zealand's largest national park, which has huge commercial interests (Fiordland National Park). The Fiordland National Park review received the largest number of submissions to any of DOC's statutory planning processes to date.

A brief description of each of the planning reviews follows. Appendix 2 provides a fuller summary of the approaches used by each conservancy in relation to sections 47 (Procedure for preparing and reviewing management plans) and 48 (approval of management plans) of the National Parks Act. Each conservancy sought different levels of engagement with the public.

#### 3.2.1 **Abel Tasman National Park Management Plan**

Abel Tasman, New Zealand's smallest national park, is located at the top of the South Island and was gazetted in 1942. The plan being reviewed had been approved in 1983. The review process studied was the second time this particular review has been initiated. The first intention to review was notified in July 1995, with a draft plan notified in March 1996. An amended draft plan was presented to the Conservation Board in March 1997, and later rejected, and DOC was asked to redraft it. The rejection related to issues about whether the foreshore of Abel Tasman National Park should be included in the Park. After several years, this issue was resolved through a separate process and the review of the plan could recommence. The second review began on 19 March 2005, with the intention to review being notified. A draft plan was notified on 28 January 2006, and submissions closed in May of that year. Two hundred and seventy-seven submissions were received, and 58 submitters heard. An amended plan was sent to the Conservation Board in June 2007, and from there sent to the NZCA in October 2007 (Heatley 2007). It was approved by the NZCA in October 2008.



### **3.2.2 Arthur's Pass National Park Management Plan**

Arthur's Pass National Park is situated in the mountains between Canterbury and the West Coast in the South Island. It was established in 1929, making it New Zealand's third national park and the first in the South Island. As well as the usual statutes, the Ngāi Tahu Settlement Claims Act 1998 also provides direction regarding consultation. The process studied was the second review of the plan. The review was initiated in September 2004, and the plan was approved by the NZCA in December 2007. The plan review received 67 submissions (CACB 2007; DOC 2007a).

### **3.2.3 Fiordland National Park Management Plan**

Fiordland National Park, established in 1952, covers a vast, remote area of wilderness in the southwestern corner of the South Island, much of which is inaccessible by road. It forms the main part of Te Wāhipounamu - South West New Zealand World Heritage Area. This review (the fourth review of the Fiordland plan) was initiated in June 1999, and the new plan was finally approved in June 2007. The draft plan received a lot of public interest, including 2107 submissions (DOC 2007b). As for Arthur's Pass, the Ngāi Tahu Settlement Claims Act 1998 also provides direction regarding consultation (e.g. s109).

### **3.2.4 Kaimanawa Forest Park Conservation Management Plan**

Kaimanawa Forest Park is southeast of Taupo, extending from Tongariro National Park in the west to the Kaweka Ranges in the east. It was gazetted in 1969. This is the only Forest Park plan considered in this evaluation. The process studied was the second management plan for the park (DOC 2007c). The review began in December 2005 and the plan was approved by the Conservation Board in June 2007. Seventy-seven submissions were received.

### **3.2.5 Tongariro National Park Management Plan**

Established in 1887, Tongariro was the first national park in New Zealand and the fourth in the world. It is located in the central North Island. The volcanic peaks at the core of the park were gifted to the people of New Zealand by Ngāti Tūwharetoa. It is a dual World Heritage area, a status which recognises the park's important Māori cultural and spiritual associations as well as its outstanding volcanic features. The implementation of *He Kaupapa Rangatira*, a framework and protocol, gives practical expression of the partnership between the managing authority and iwi, to ensure tāngata whenua have an evolving and ongoing role in the management of the park (DOC 2006b). The process studied was the fourth review of the park plan. The review was initiated in February 2002 and the plan became operative in 2006 when it was approved by the NZCA. The review process received 84 written submissions, and 32 submitters were heard.

### **3.2.6 Whanganui National Park Management Plan**

Whanganui National Park, established in 1986, is located along the Whanganui River in the central North Island. The area has a unique river-based history; and Māori culture is an important part of the park experience. The first Whanganui management plan was approved in 1989. The National Parks Act contains specific instructions on the inclusion of the Whanganui River iwi (s30 (2a, b)). There is a

specific requirement that the Conservation Board shall have regard to the spiritual, historical, and cultural significance of the Whanganui River to the Whanganui iwi; and that it will seek and have regard to the advice of the Whanganui River Māori Trust Board on any matter that involves the spiritual, historical, and cultural significance of the park to the Whanganui iwi. The process studied was the first review of the Park's management plan. The intention to review was notified in June 2003. The draft plan was notified in July 2006, and submissions closed at the end of September that year. At the time of writing, the revised plan was still to be completed and presented to the Conservation Board. Seventy-four submissions were received, and hearings held for 22 submitters.

### 3.3 APPROACH

The two research methods used in this study were:

- A postal and online survey of people and organisations that prepared submissions to one or more of the six reviews. The findings from the survey were also used to inform the development of the key-informant interviews.
- Interviews with staff, members of the NZCA, members of Conservation Boards, and individuals and representatives of groups that prepared submissions.

#### 3.3.1 Postal and online survey

The first research method used in the study was a postal and online survey of people and organisations that had prepared submissions to one or more of the six reviews. This part of the evaluation was conducted by a research company (Research New Zealand) on behalf of DOC. A self-completion survey was posted out to 1001 submitters. Respondents were also able to complete the survey online. With the exception of submitters to the Fiordland NPMP, wherein a random sample of 470 potential respondents were selected from the 1711 submitters whose contact details were still relevant, a census approach was taken in that all individuals or organisations who had made a submission to one or more of the above management plan reviews was contacted<sup>8</sup>.

Survey respondents were asked about their:

- Involvement in the management plan process
- Perceptions of the initial stages of the process
- Perceptions of the Draft Management Plan and submission process
- Perceptions of the follow-up to the submissions process
- Overall opinions on the review process

A copy of the survey form and covering letter is provided in Appendix 3.

Reminder letters were sent to those in the sample of submitters who had not responded after 2 weeks. Sixty surveys did not reach the intended recipient, either because of an incorrect address ( $n = 55$ ) or because the recipient was reported as deceased ( $n = 5$ ). A further nine recipients responded, saying they were not interested in participating in the survey.

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<sup>8</sup> Where an individual or organisation had submitted to more than one consultation process, they were asked to select just one to comment upon.

The survey process was completed between 27 July and 31 August 2007. A total of 231 completed surveys were received in this time, representing a 24.6% response rate. The total sample had a maximum margin of error of  $\pm 6.1\%$  (95% confidence level). Table 4 shows the response rate and maximum margin of error for each of the case studies. The relevant data tables are attached in Appendix 5. The purpose of the study was to provide a collective understanding of barriers and facilitators to guide improvements to practice; therefore the results are reported on the total survey population.

### 3.3.2 Interviews

To obtain more detailed information on participants' experiences and to expand on the findings from the survey, a small number of participants were interviewed. In consultation with the relevant conservancy management planners, a number of submitters to the Abel Tasman, Arthur's Pass, and Whanganui management plans were identified (to enable recall, as these plans were those in the sample that had been prepared most recently), and invited to be interviewed. Interviewees were selected so that one or more of the three study reviews were covered; they were able to provide both a regional as well as a national perspective; they had a wide geographical spread; and they represented a range of stakeholders.

In total, 26 key-informant interviews were conducted with stakeholders involved in the management plan reviews, and representatives from five national interest groups. Fifteen submitters, six DOC staff, four conservation board members, and one NZCA member were interviewed. Each interview was conducted by one of the three researchers on the evaluation team.

All interviews followed a set interview schedule (Appendix 4). Interviewees were asked to comment on the specific management plan review and also invited to draw on their knowledge and experience of other planning processes. The interview topics covered:

- Purpose of public involvement
- Scope of reviews and level of involvement
- Methods for public involvement
- Results
- Resources and capacity
- Representation

TABLE 4. MARGINS OF ERROR AND RESPONSE RATES FOR EACH OF THE MANAGEMENT PLAN CASE STUDIES.

PLAN	<i>n</i>	RESPONSE RATE (%)	MAXIMUM MARGIN OF ERROR ( $\pm\%$ )
Abel Tasman NPMP	59	25.7	11.3
Arthur's Pass NPMP	24	40.0	16.1
Fiordland NPMP	73	16.2	11.2
Kaimanawa FPCMP*	26	40.6	15.6
Tongariro NPMP	16	24.2	22.0
Whanganui NPMP	33	50.8	12.8
<b>Total</b>	<b>231</b>	<b>24.6</b>	<b>6.1</b>

\* Forest Park Conservation Management Plan.

# 4. Survey results—public involvement in management plan reviews

## 4.1 INTRODUCTION

This section summarises the key results from the self-completion postal survey (also available online) sent to people and organisations that had made written submissions on the Abel Tasman, Arthur’s Pass, Fiordland, Tongariro and Whanganui National Park Management Plan reviews, and the Kaimanawa Forest Park Conservation Management Plan review. This section first examines the profile of respondents to the survey. It then describes respondents’ involvement in the management plan review process. This is followed by a description of respondents’ involvement in the early consultative stages of the process (prior to the release of a draft management plan), experiences in responding to an actual draft management plan (through written submissions, attending a hearing, or other ways), and experiences following the submission period. The section concludes with respondent views of the overall process.

## 4.2 PROFILE OF SURVEY RESPONDENTS

Most respondents to the survey completed their submission as an individual (59%), rather than as a representative or member of an organisation (29%) (Table 5). A small proportion replied that they wrote their submission as both an individual and a representative of an organisation (6%), although this was not offered as a response category.

Survey respondents generally belonged to outdoor recreation, conservation, or environmental groups (Table 6): 69% of those who said they completed their submission as individuals are members of such groups; and of those who completed their submission on behalf of an organisation (Fig. 4), 40% did so as representatives of an outdoor recreation group, 12% as representatives of conservation or environmental groups, and 10% for businesses.

TABLE 5. SUBMISSION REPRESENTATION.

PROPORTION OF RESPONDENTS (%)	
Individual	59
Organisation	29
Other	6
Both individual and organisation	6
No response	0
Total*	100

\* Total number of submissions = 231.

TABLE 6. RESPONDENTS’ PARTICIPATION IN OUTDOOR RECREATION, CONSERVATION OR ENVIRONMENTAL GROUPS.

PROPORTION OF RESPONDENTS (%)	
Yes	69
No	30
No Response	1
Total*	100

\*  $n = 150$ —a sub-sample based on those who completed the submission as an individual.

Figure 5 shows the distribution of all respondents by age group. Only 4% of respondents were aged under 30 years, 35% percent were aged 60 years plus, and 29% were between 50 and 59 years old.

Almost three-quarters of respondents were male (74%) and 23% were female (see Table 7). Submitters to the Fiordland National Park plan were more likely to be male (92%) than the total sample, while submitters to the Whanganui National Park plan were more likely to be female (45%) than the total sample.

As shown in Fig. 6, the majority of respondents were European, New Zealand European, or Pakeha (68%). A substantial proportion (37%) also identified as New Zealander or Kiwi (respondents could identify with more than one ethnicity). Only 4% identified as Māori, and 1% as Pacific Islander.

Figure 4. Types of organisations respondents represented ( $n = 92$ ). Subsample based on those who completed a submission as a representative of an organisation. Total may exceed 100% because of multiple responses.

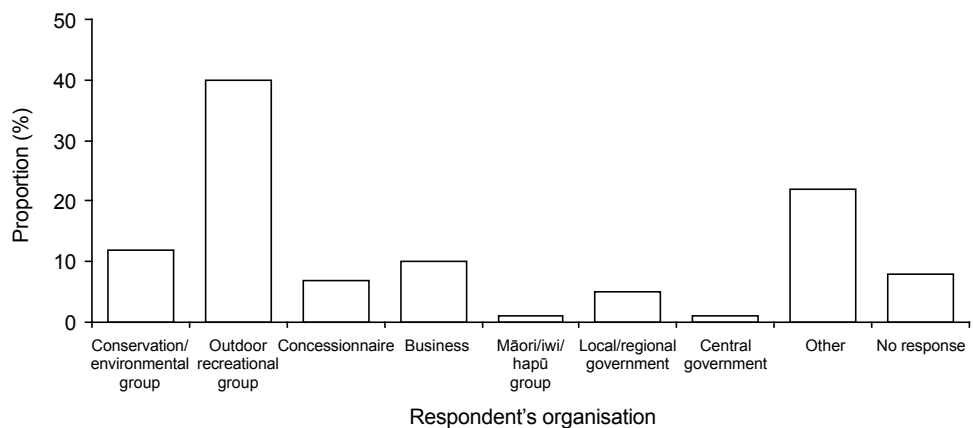


Figure 5. Age of respondents ( $n = 231$ ).

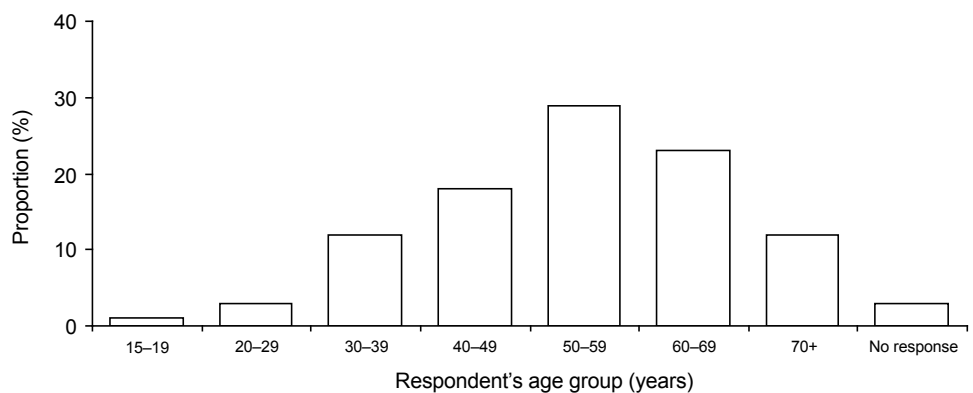


TABLE 7. GENDER OF RESPONDENTS.

PROPORTION OF RESPONDENTS (%)	
Male	74
Female	23
No Response	3
Total*	100

\*  $n = 231$ .

Forty percent of respondents had a Bachelor's degree or higher, as shown in Fig. 7. Submitters to the Fiordland National Park plan were less likely to hold a Bachelor's or higher degree (15% compared to 40% of total sample).

Most submitters were full-time salary or wage earners (37%), self-employed/business owners (33%), or part-time salary or wage earners (9%) (Table 8). About one-fifth (21%) were retired.

About one-fifth of survey respondents (21%) earned \$30,001 to \$50,000, and about one-third (33%) earned over \$50,000 (Fig. 8). Another fifth (23%) preferred to not say what their gross personal income was in the last year.

Figure 6. Ethnicity of respondents. Total may exceed 100% because of multiple responses.

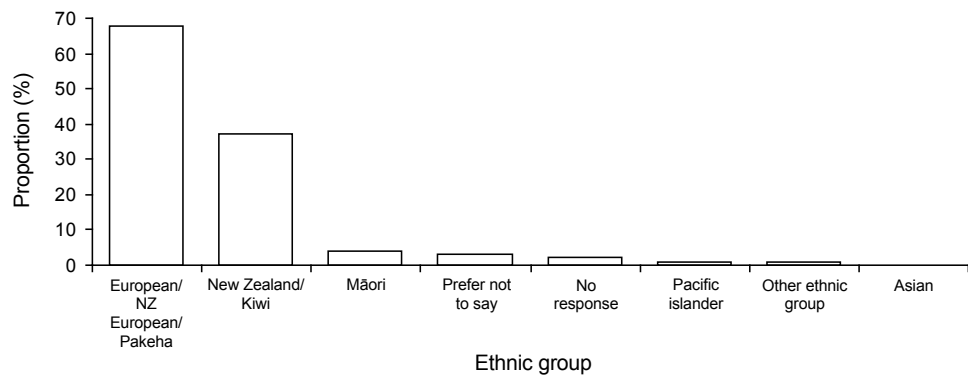


Figure 7. Highest qualification of respondents (n = 231)

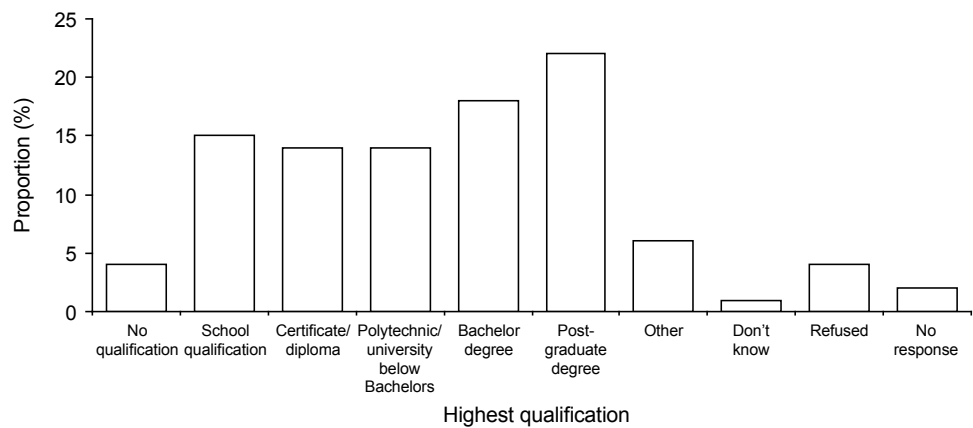
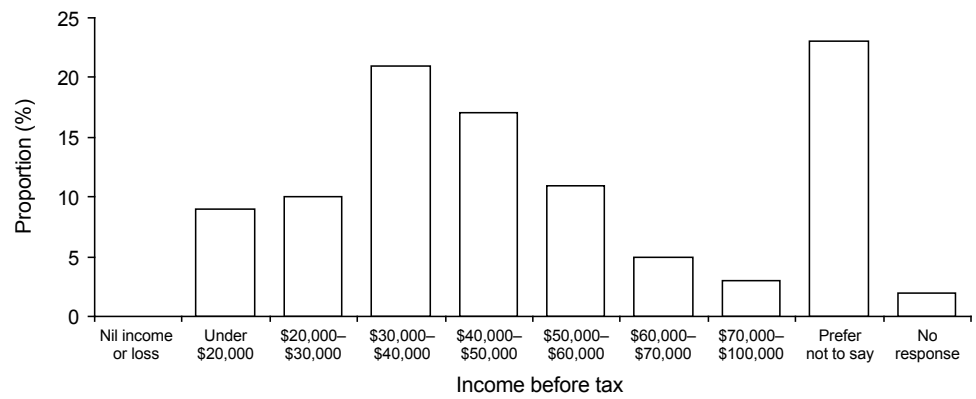


TABLE 8. EMPLOYMENT STATUS OF RESPONDENTS (n = 231).

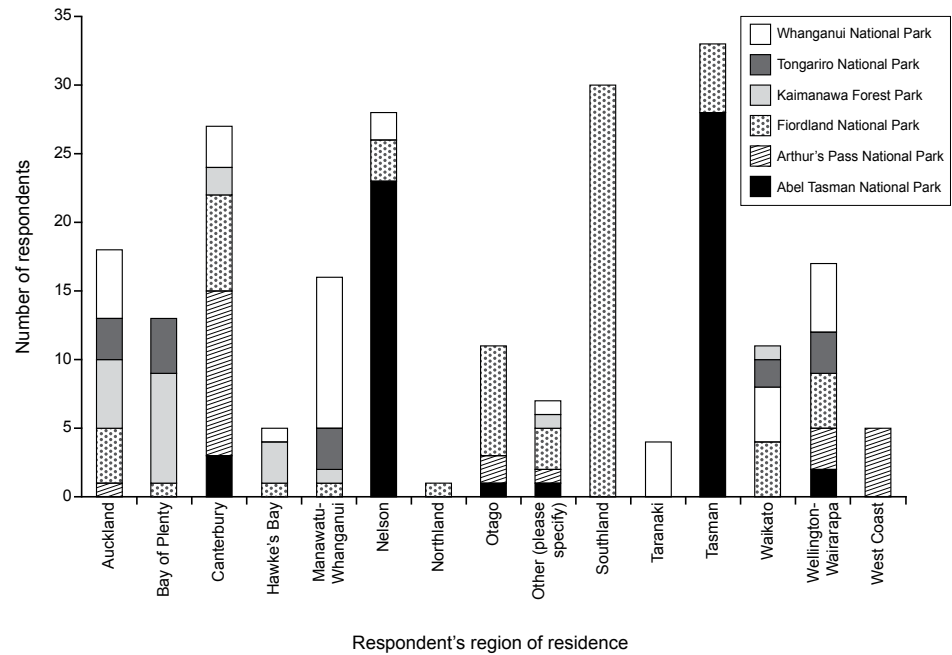
PROPORTION OF RESPONDENTS (%)	
Full-time salary or wage earner	37
Self-employed/Business owner	33
Retired	21
Part-time salary or wage earner	9
Other	5
Student	3
Full-time home-maker	2
Prefer not to say	1
No response	1
Unemployed	0
Other beneficiary	0

Figure 8. Gross annual income of respondents ( $n = 231$ ).



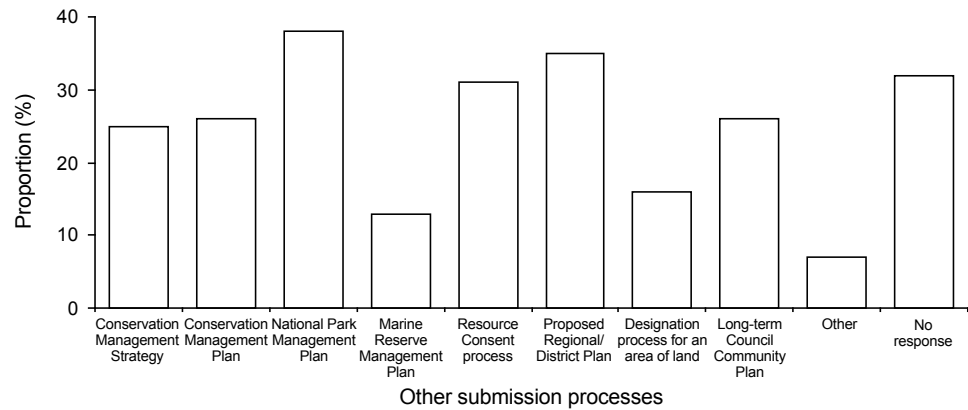
Respondents were located throughout New Zealand, but tended to be clustered in areas around the study parks (Tasman 14%, Southland 13%, Nelson 12%, Canterbury 12%) and, to a lesser extent, in the main population centres (Fig. 9). Those respondents who made a submission on the Abel Tasman plan were more likely to live in Tasman District (47% compared with 14% of the total sample) or Nelson (39% compared with 12% of the total sample). Those who made a submission on the Fiordland plan were more likely to come from Southland (41% compared with 13% of the total sample). Those who made a submission on the Whanganui plan were more likely to be from Manawatu-Wanganui (33% compared with 7% of the total sample).

Figure 9. Submission responses by locality of submitters.



Many submitters said that they had also been involved in preparing submissions for other protected areas or environmental management plans (Fig. 10). Of the submitters, 38% had previously prepared a submission on another national park management plan, 35% had made a submission on a proposed regional or district plan, and 31% had been involved in a resource consent process. Notably, those who made a submission on the Fiordland plan were less likely to have also made a submission on a proposed regional or district plan (18% compared with 35% of the total sample) or a long-term community plan (12% compared with 26% of the total sample).

Figure 10. Respondents' involvement in other submission processes ( $n = 231$ ). Total may exceed 100% because of multiple responses.

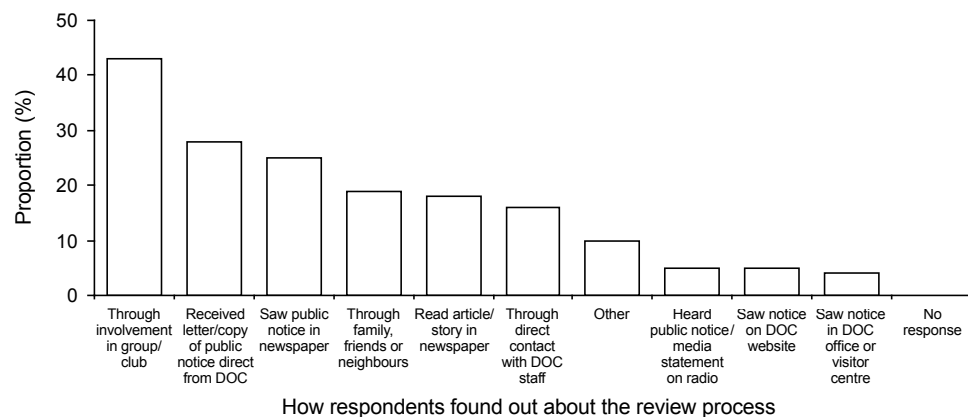


#### 4.3 GETTING INVOLVED IN THE MANAGEMENT PLAN REVIEW PROCESS

This section describes how respondents became involved in the management plan review process, as well as the ways in which they participated in the overall review process.

Many respondents became involved in the review process through membership of a group or club (43%), after receiving a hard copy of a public notice directly from DOC (28%) or after seeing a public notice in a newspaper or other publication (25%) (Fig. 11). Only 5% reported seeing a notice on the DOC website. Submitters to the Abel Tasman plan were more likely than others to have heard about the review process by reading about it in a newspaper or magazine article (36% compared with 18% of the total sample). Submitters to the Fiordland plan were less likely than others to have found out about the review by receiving a letter or a copy of the public notice from DOC (14% compared with 28% of the total sample).

Figure 11. Mechanisms by which respondents became aware of the management plan reviews ( $n = 231$ ). Total may exceed 100% because of multiple responses.





When asked to provide the most common reasons for getting involved in the review process, the respondents' open-ended comments could be grouped as follows:

- To protect or promote an interest as a park visitor or user (26%); for example:  
*A proposed change would adversely affect my efforts to train people to safely enjoy the outdoors.*  
*Preserve camping interests at the park.*
- To exercise one's democratic right (23%); for example:  
*The Park belongs to the people of NZ. Therefore we have a right to say how it is managed.*  
*Because us Kiwis have the right to go into these places.*
- To safeguard local community interests (19%); for example:  
*Because the Department was planning to stop maintenance on huts which are well used by boaties.*  
*Because it is important that the plan reflects the importance of the SH 73 link between Westland and Canterbury.*

Table 9 shows the ways respondents contributed to the review process. Respondents were provided with a list of eight items to choose from (allowing multiple responses). Almost three-quarters of respondents said they prepared a written submission on the draft management plan (74%). As the survey sample is based on people who made written submissions, it is possible that people have misinterpreted this question, i.e. the total should be 100%. Almost half made suggestions at an earlier consultation stage (48%), a quarter attended a hearing (25%), nearly a fifth attended a meeting to discuss proposals in the draft plan (19%), and 14% attended a meeting at an earlier consultation stage. Submitters to the Fiordland plan were less likely than others to attend a formal hearing to present an oral submission on the draft management plan (11% compared with 25% of the total sample).

Just under half (48%) of respondents indicated that they did not want the opportunity to be involved or contribute to the submissions process in any way other than how they had done. Some people would have liked to have had the opportunity to be involved in a public or interest group meeting to discuss the

TABLE 9. WAYS RESPONDENTS CONTRIBUTED TO THE REVIEW PROCESS ( $n = 231$ ).

	PROPORTION OF RESPONDENTS (%)*
I prepared a written submission on the draft management plan	74
I made written suggestions on what should be included in the draft	48
I attended a formal hearing to present an oral submission on the draft management plan	25
I attended a public meeting or an interest group meeting to discuss suggestions on what should be included in the draft plan or in response to a discussion paper	14
Other	10
I was approached for advice or views on specific issues	7
I was contacted to clarify some aspects of my submission	4
No response	3

\* Total may exceed 100% because of multiple responses.

actual draft management plan (16%); to discuss what should be included in the draft management plan (14%); to make written suggestions on what should be included in the draft plan or to have commented on a discussion paper (14%); and to have attended a hearing (10%).

#### 4.4 PERCEPTIONS OF THE INITIAL STAGES OF THE PROCESS

This section focuses on the initial stages of the management plan review process, particularly the involvement respondents had in this stage, the information received and its usefulness, feedback provided to DOC, and any meetings attended.

Just under two-thirds (65%) of respondents received some form of information or a discussion document outlining the key issues for the draft management plan (Table 10). Of those who received information ( $n = 151$ ), many received a discussion document (45%). One quarter of respondents (25%) received information outlining the review process and almost as many (23%) received information outlining key management planning issues covered in the review (all in the form of a letter, a pamphlet or an information pack).

Just over three-quarters (76%) of respondents who received initial information indicated that the information was helpful in understanding the review process, and 68% indicated that the information was helpful in understanding the issues covered in the review (Fig. 12). Nearly a quarter of respondents thought the initial information was helpful because it provided a useful basis for comment (24%); for example: *As I recall I was able to quickly group the issues in which I was interested*. A small number thought it was unhelpful because the issues appeared to be pre-determined by DOC (7%) or because the information was too complicated (5%). Nearly half of the respondents (47%) did not provide further explanation.

Just under half of respondents (48%) provided feedback or suggestions to DOC in the initial stage of the review. Of those who provided feedback at this stage ( $n = 111$ ), the majority (71%) reported using personal experiences or knowledge of the area as sources of information for putting their feedback together (Fig. 13).

TABLE 10. TYPE OF INFORMATION RECEIVED BY RESPONDENTS ( $n = 151^*$ ).

	PROPORTION OF RESPONDENTS (%) <sup>†</sup>
A discussion document	45
A letter, a pamphlet or an information pack outlining the review process	25
A letter, a pamphlet or an information pack outlining key management planning issues covered in the review	23
A copy of the existing approved management plan for the area	16
A copy of particular sections of the new plan as it was being drafted	20
Other	9
Don't know	5
No response	3

\* Subsample based on those who received initial information.

† Total may exceed 100% because of multiple responses.

Figure 12. Respondents' assessments of how helpful information received was for understanding the review process and issues covered ( $n = 151$ : subsample based on those who received initial information).

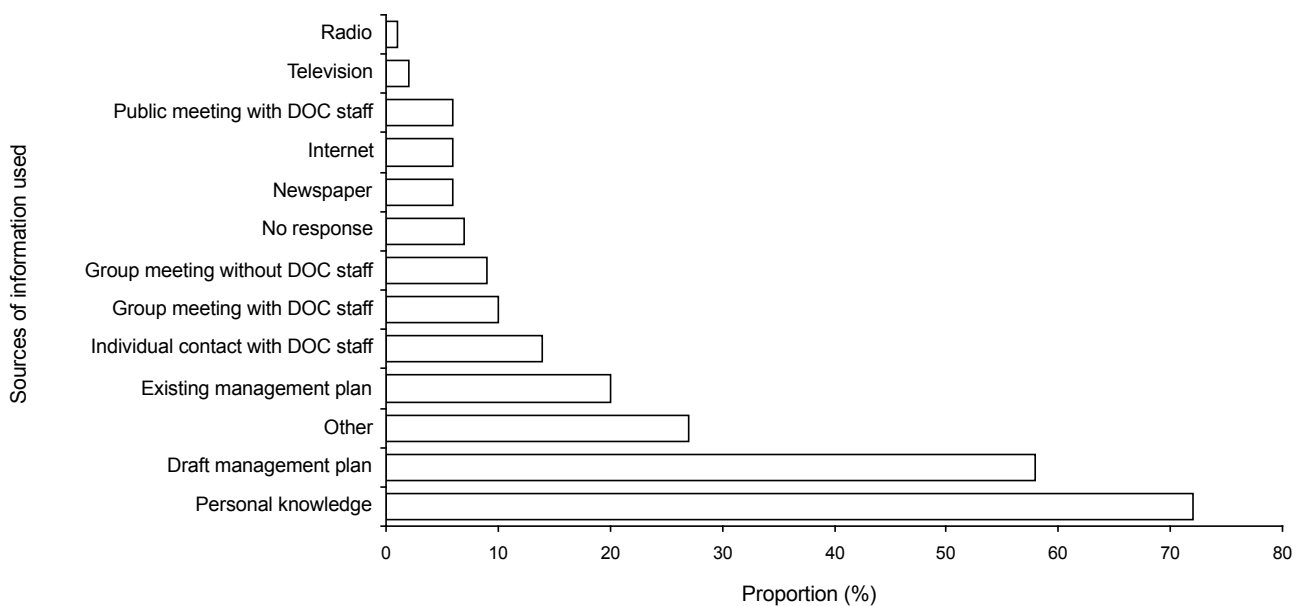
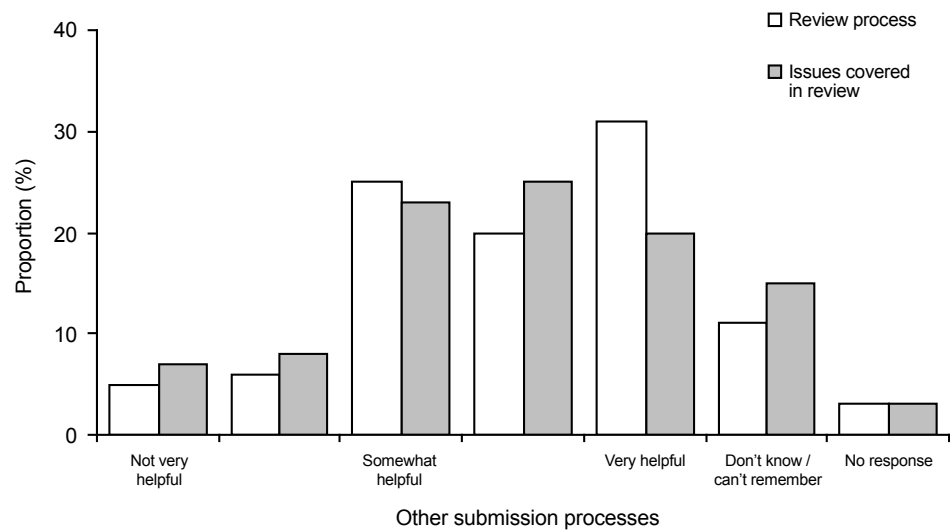


Figure 13. Sources of information used in putting together feedback ( $n = 111$ : sub-sample based on those who provided feedback at the initial stage of the review). Total may exceed 100% because of multiple responses.

Forty-one percent said they used a discussion paper and 22% used an individual meeting or contact with DOC staff.

Almost one-quarter of respondents (24%) attended a public or interest group meeting during this early stage of the review process. Of those respondents, 75% said they found the meetings helpful in understanding the issues covered in the review. However, 20% said the meetings were not helpful.

The remaining 76% who did not attend meetings during this initial stage were asked why they did not attend. The main reasons for not attending were the location of the meetings (30%), and respondents being unaware of the meetings (27%), or the time or date the meetings were held (22%) (Table 11). Abel Tasman plan respondents were less likely to give the location of the meetings as a reason for not attending (11% compared with 30% of the total subsample).

TABLE 11. REASONS RESPONDENTS GAVE FOR NOT ATTENDING MEETINGS IN THE INITIAL STAGES OF THE REVIEW ( $n = 111^*$ ).

	PROPORTION OF RESPONDENTS (%) <sup>†</sup>
Location prevented me	30
Didn't know about any meetings	27
Time/date prevented me	22
Other	16
Meeting not available	13
Didn't think it would be helpful	11
No response	6
Wasn't that interested	3

\* Subsample based on those who did not attend meetings during the initial stage of the review.

† Total may exceed 100% because of multiple responses.

Two-thirds of respondents did not see any way the information they received could be improved (52% no response, 8% happy with information, and 6% don't know). Some suggestions were made to improve the initial stage of the management plan review. The comments made can be grouped along the lines of the following examples:

- Improved notification and updating (7%):

*It would be good to be kept in the loop after our written submissions were made.*

*It is difficult to know when new draft management plans are coming out, other than regularly checking the DOC website. Maybe there could be better ways of letting user groups know.*

- Better opportunities for input (5%):

*Living in North Island, so not able to attend meetings in South Island. More use of internet.*

*Would have been good to talk to some DOC staff involved*

- More information (5%):

*More summaries, concise ways of presenting information.*

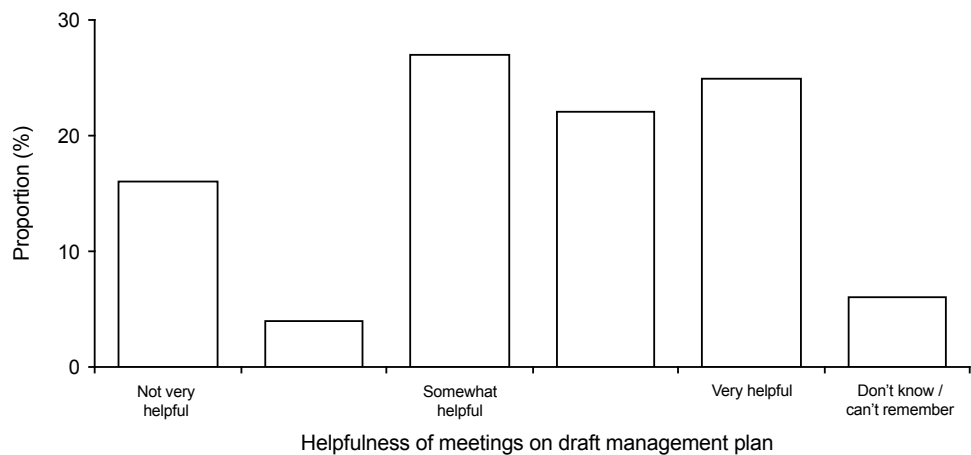
*More information about [the] plan.*

#### 4.5 PERCEPTIONS OF THE WRITTEN SUBMISSION PROCESS

This section describes respondents' attendance of meetings after the release of the draft plan, sources of information used to put together their submission, and attending meetings (hearings) to speak in support of their written submission.

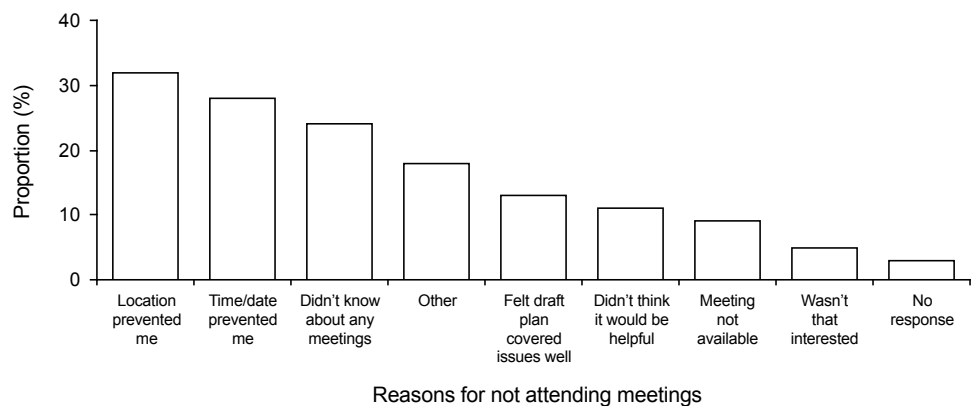
One-fifth of the respondents (22%) attended a public or interest group meeting with DOC after the draft plan had been released. Of those who attended a meeting at this stage, almost three-quarters (74%) indicated that the meeting had been helpful in improving their understanding the issues covered in the draft management plan, although 20% believed the meetings were not helpful (Fig 14).

Figure 14. Respondents' assessment of helpfulness of meetings for improving their understanding of issues covered in draft management plan ( $n = 51$ ; subsample based on those who attended meetings after the plan had been released).



For those respondents who did not attend, the main reasons for this were the same as those given by respondents for not attending a meeting during the initial stages (Fig. 15): prevented by location (32%), prevented by time/date of meetings (28%), or did not know about any meetings (24%). Respondents who made a submission to the Abel Tasman plan were significantly less likely to say that the reason they did not attend was because the location prevented them (11% compared with 32% of the total sub-sample). Respondents submitting to the Fiordland plan were also significantly less likely to say they did not attend because they did not know about any meetings (8% compared with 24% of the total subsample).

Figure 15. Reasons respondents gave for not attending meetings on draft management plan ( $n = 180$ ; subsample based on those who did not attend meetings after plan was released).



The most common source of information used in putting together a submission was, by some margin, personal experience and/or knowledge of the area (72%), as shown in Fig. 16. Other sources of information used in putting together a written submission on the draft management plan were the draft plan itself (58%), other sources (27%), and the existing approved management plan (20%). Interestingly, respondents submitting to the Whanganui National Park plan were significantly more likely to have used the internet for this purpose (24% compared with 6% of the total subsample).

Nearly two-thirds of respondents (65%) thought that the draft management plan alone provided enough information for them to make a submission. Nearly a quarter (24%) did not, and of those who thought the draft plan did not provide enough information ( $n = 81$ ), 46% did not say what other information they would have liked. Fourteen percent, however, would have liked further clarification and explanation of proposals, and 11% would have liked more background information.

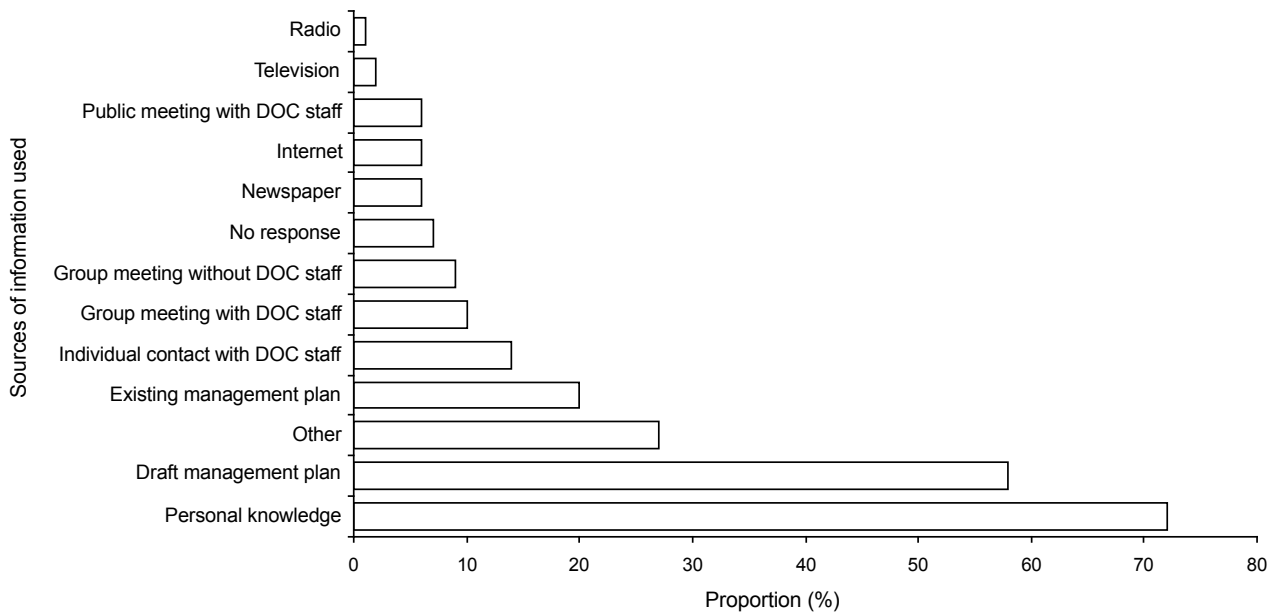


Figure 16. Sources of information used by respondents in putting together written submission ( $n = 231$ ). Total may exceed 100% because of multiple responses.

When asked to rate the information that was provided in the draft management plan, 52% said that it was adequate and covered the key issues, and 48% said it was easy to understand (Fig. 17). Those who made a submission to the Fiordland National Park plan were significantly less likely to say the information provided was adequate and covered all key issues (14% compared with 28% of the total subsample), and that it was very easy to understand (8% compared with 20%). For all plans, nearly one-third of respondents (31%) said that the plan was unbalanced and biased, and 23% of submitters rated the information provided in the draft management plan as balanced and unbiased.

The majority of respondents (83%) said that making a written submission was their preferred way of participating in the plan review. The main reasons why a written submission was preferred were because it was more convenient (19%), or because it provided the best opportunity to make considered comment (e.g. they had time to prepare, reflect, review, and change their views) (14%), or that a written document carried the most weight or chance of influence and provides an official record (10%). Just 6% of respondents would have preferred to meet and discuss the review issues.

When asked about ways in which respondents felt their participation in the review process could have been improved, 61% provided no response to this question, 11% said the process was adequate, and 5% said they did not know. A few people wanted more opportunities for public meetings (4%), and more opportunities to talk with DOC staff (3%).

One-quarter (25%) of respondents attended a hearing to speak in support of their written submission. A few respondents (6%) had someone else speak in support of it. For those who spoke in support of their submission, 70% found it easy to do so. Of those who did not ask to be heard in support of their submission (69%), 45% said this was because they felt their written submission was enough, 27% said the location was not accessible, and a further 23% said they had work obligations (see Table 12).

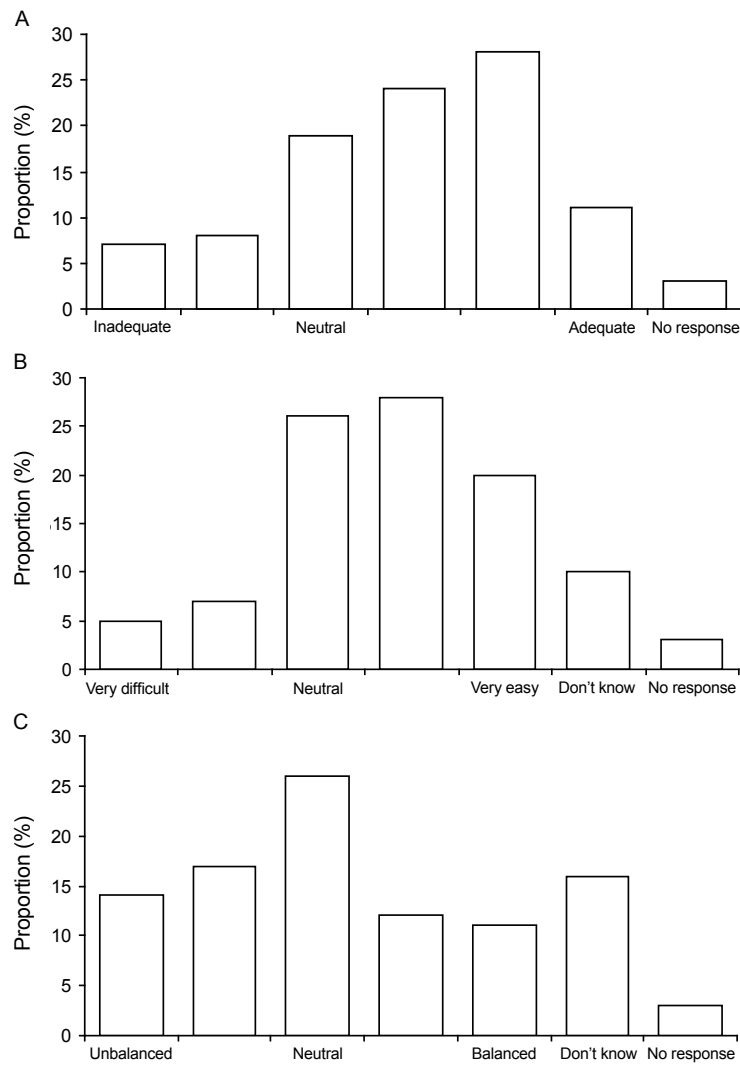


Figure 17. Respondents' views on standard of information provided in plan. A = Cover of key issues, B = Ease of understanding, C = Perceived bias ( $n = 231$ ).

TABLE 12. REASONS RESPONDENTS GAVE FOR NOT SPEAKING IN SUPPORT OF SUBMISSIONS ( $n = 168^*$ ).

	PROPORTION OF RESPONDENTS (%) <sup>†</sup>
I felt written submission was enough	45
Location was not accessible	27
I had work obligations	23
Other	23
My interests were being represented by someone else	19
Time/date prevented me	18
I don't like hearings	9
My submission was in support of draft management plan and I did not feel it was necessary to speak to this	7

\* Subsample based on those who did not ask to be heard in support of their submission.

† Total may exceed 100% because of multiple responses.

Most respondents (a total of 75%) did not offer any suggestions on how the formal hearing process could be improved (62% offered no response to this question, 8% said the process was adequate, and 5% said they did not know). The most common suggestions for improvement were:

- More accessible formal hearings, such as local meetings, weekend hearings, opportunity to video-conference (6%)
- An independent, neutral and unbiased panel for the hearing process (5%)

#### 4.6 PERCEPTIONS OF FOLLOW-UP

This section describes respondents' views on the usefulness of feedback provided after the submission process. At the time of the survey, not all of the management plan review processes included in the survey had reached a stage of providing feedback to submitters. Respondents were asked to complete all relevant parts of this section of the survey based on their experiences to date. Feedback on the Kaimanawa plan was sent during the survey period. At the time of the survey, formal feedback had not yet been provided for the Abel Tasman and Whanganui plans.

Less than half of the respondents (45%) reported receiving written feedback about their submission on the management plan review; with over half saying they had not received feedback on their submission (55%). Those who made a submission to the Abel Tasman and Whanganui plans were significantly less likely than others to have received written feedback (19% and 21% respectively, compared with 45% of the total sample). As these review processes were not complete at the time of the survey, many respondents were yet to receive feedback. Those who made a submission to the Fiordland plan were significantly more likely to have received written feedback (68% compared with 45% of the total sample).

Forty percent of those who received feedback ( $n = 104$ ) considered it useful or very useful (Fig. 18).

Of the 127 respondents who had not received any written feedback about their submission, most (70%) thought it would have been useful to receive it.

One-fifth (20%) of respondents believed the management plan review took all points of view into account, but another fifth (21%) thought the review did not take these into account (Fig. 19).

When asked to provide additional comments on how well views were taken into account, most people offered no response to this question (55%), or said they did not know (16%). There were, however, several people who made comments about stakeholder interference and equality (e.g. they felt that the public consultation process did not reach enough park users, visitors, or the wider public) (8%), or who made comments about political interference (5%). A small number also gave generally supportive comments (6%).



Figure 18. Respondents' assessment of usefulness of feedback on submissions ( $n = 104$ ; subsample based on those who had received written feedback about their submission).

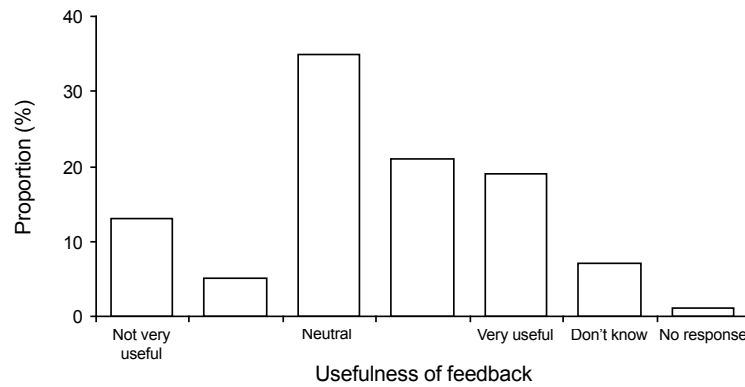
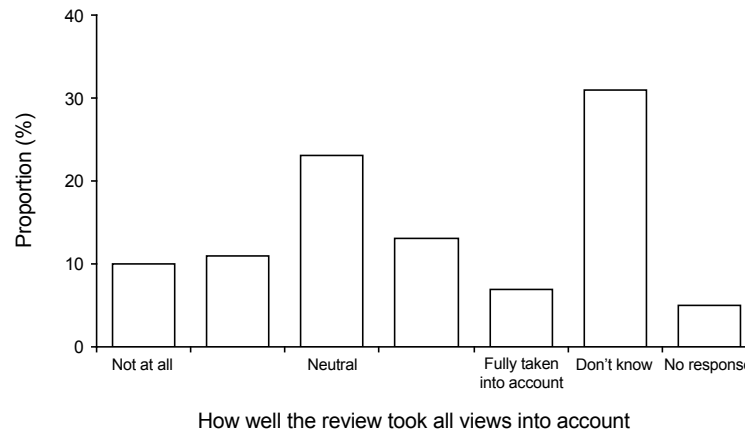


Figure 19. Respondents' assessment of how well all views were taken into account in the review ( $n = 231$ ).



#### 4.7 OVERALL OPINIONS OF THE REVIEW PROCESS

This section describes the respondents' overall views on the opportunities for public involvement in the review process. Respondents were given the opportunity, through three open-ended questions, to nominate the key strengths and weaknesses of the review process, and also to give any final feedback on how they thought the process could be improved.

Opinions on what were the key strengths of the review process were fairly evenly divided across a number of areas, though the most frequently cited strengths were that:

- The process was open and accessible (12%)
- The process was well publicised and notified (12%)
- There were opportunities for public/consultation meetings (10%)

There was also a wide spread of responses when submitters were asked what the key weaknesses of the process were, for example:

- The duration of the review (14%)
- That there was political interference in the process (9%)
- That there was a lack of opportunity to engage and debate the issues (8%)
- That there were issues with stakeholder representation and inequality between submitters (8%).

The three main ways in which respondents felt the process could be improved were:

- To make the process more open, and to have less political interference (10%)
- To have fairer stakeholder representation and equality (7%)
- To provide better feedback (7%)

# 5. Main findings: key-informant interviews

## 5.1 INTRODUCTION

The results presented in this section are based on 26 key-informant interviews with stakeholders involved in the Abel Tasman, Arthur's Pass and Wanganui NPMP reviews, and with representatives from five national interest groups. Some of those interviewed had been involved in more than one process (previously and/or currently) and used their wider experience to respond to the questions posed.

The purpose of the interviews was to expand on the findings of the survey and to obtain more detailed information on participants' experiences.

The interviews were based on predetermined topics based on the literature, the research objectives and findings from the quantitative survey. The topics addressed were:

- The purpose of public involvement
- The scope of NPMP reviews
- Methods used to involve the public
- Resources and capability
- Representation

Additional topics that emerged from the interviews were also included.

The findings from the interviews are presented below. The implications of these findings and the survey results presented in the previous section will be discussed in Section 6 to help understand the effectiveness of public participation in DOC's consultation processes and identify facilitators and constraints to this involvement.

## 5.2 PURPOSE OF PUBLIC INVOLVEMENT

When plans are reviewed, public involvement was identified as a way of 'putting a finger on the pulse of the community' and re-evaluating the direction of park management. Community consultation was described by one interviewee as being a process to create 'shared ownership'. There was general agreement that many of the people who get involved in the consultation process have a recreational or financial interest, or a strong sense of stewardship, and want to contribute to the future management direction of the park. Consultation was described as providing an opportunity to get stakeholder 'buy-in' and to 'get people on board' to support the development and implementation of the plan, and that it could help to build trust between DOC and stakeholders, and create shared ownership:

*Where people can see the value of direct involvement in a plan, especially if [they] can see their issue reflected in the plan, it can be quite empowering.*

While there was wide consensus that public consultation is important, the expected level and nature of that consultation and the perceived value of the consultation process varied across interviewees. A number of stakeholder interviewees were wary or cynical about the consultation process and felt that often DOC was paying ‘lip service’ to it, or that it was ‘tokenism’ or ‘a charade’:

*I have little faith in the [consultation] process. They [DOC] have to do it but they don't have to listen.*

*Myself and most of the people doing submissions thought it was a pointless process but we thought our voices should be heard.*

A number of stakeholders interviewed believed that there are plenty of opportunities for people to be involved, and that there is a risk of over consultation:

*The problem with consultation processes is that people have been over consulted.*

A DOC staff member commented that:

*There is a tendency for DOC staff to consult more than is provided for in the Act; start to muddy the process in the Act. There are costs to trying to be too inclusive. It seems to be a given that we [DOC] have to consult, but we have to do what is required in the legislation [not more]. Unconstrained consultation can cause lots of costs ... be sensible about what is needed.*

When discussing the purpose for public input, the frequency of reviews was also raised. There was wide consensus amongst interviewees of the importance of regularly reviewing park management plans to take account of environmental and social changes. The demands and pressures on a park evolve over time and many examples were given of unanticipated changes that can be addressed through a plan review. These included demands for access by film crews, mountain bikers, and four-wheel-drive vehicles. Other examples included new species under threat or technological developments such as the construction of mobile phone towers. A plan review was described as providing the opportunity to keep pace with pressures while maintaining the values of the park.

On account of the constantly evolving and changing pressures and demands on national parks, most interviewees commented that a plan review should not be left any longer than 10 years. Some interviewees suggested that, ideally, the plans should be reviewed more regularly, but this was deemed unrealistic, as some plans had taken many years to finalise, and in some cases there had not been an active plan in place for a long period of time:

*There should only be a 10-year approach to conservation management as it is dynamic. But it's a problem when it takes 10 years to write a plan ... a resourcing issue.*

Further views on the consultation processes are discussed in Section 5.4.

### 5.3 SCOPE OF NPMP REVIEWS

The Department of Conservation develops and implements a number of different policies and plans upon which the public are invited to provide submissions. Interviewees were asked whether submitters were clear about the scope of the NPMP reviews and understood what was covered by a NPMP as opposed to a CMS or DOC's general policies.

Interviewees thought that the groups and individuals who submit on plans are often concessionaires or from professional interest groups with an ongoing relationship with DOC. These people were believed to have a good understanding of the role and scope of the various plans, and able to give feedback at the level DOC expects. A number of interviewees acknowledged that it would be difficult for anyone to get involved who was not familiar with plan processes and the hierarchy of the various plans and strategies. While the people interviewed for this research did appear to have a clear understanding, some DOC staff interviewed said they have had to explain many times the relationship between the general policies, CMSs, NPMPs and DOC's organisational structure:

*Our systems and structure are complex. They are important to us, but not so important for the public.*

While most interviewees appeared to have a fairly clear understanding of DOC's statutory planning hierarchy, there were varying views on the level of detail that should be included within NPMPs. Some interviewees questioned whether management plans should be more operational, as the general policies and CMSs set the broad strategic directions. One DOC staff member interviewed asked:

*How much in the General Policy covers what is sitting in the individual national park management plans? You could put a lot of it aside and then say here are the issues that are crunchy for us around this specific national park and this is what consultation is covering. If left at General Policy level we would be reducing the ability of the local population to have much say in where the park is going. So we need something locally but do we need another strategic document or a bit more of a real management plan?*

A stakeholder interviewee commented:

*Our frustration with DOC plans is that they are all about high level stuff already in the Act and General Policy. When you get down to the nitty gritty you hit a stone wall. All through the plans it says 'that depends on operational priorities' ... no real commitment to do anything, just lots of fine words ... a bit sad.*

Several interviewees questioned whether 'management plan' was the right name for this document and instead suggested it was a 'strategic plan' that set the direction for the next 10 years rather than a management plan to deal with specific budget priorities:

*I struggle with calling it a management plan in some ways—it is kind of a strategic overview for the National Park. To me a management plan would be more prescriptive and probably cover a shorter time period and would have some timelines and dollars attached to it.*

*Is it a management plan? The 'mights' and 'mays' suggest it is not meaty enough to be a management plan. The plan hardly ties DOC down to anything.*

On the other hand, one interviewee argued that a 10-year plan should not be too constrained:

*Plans don't want to be so constraining. Priorities and views evolve within the 10-year timeframe so don't want a plan that is so rigid that it is cutting off all avenues, but it is instead laying down some fundamental principles as to where we are going to be going over the next 10 years.*

There were also comments on the variation in levels of detail in the NPMPs across the country, with some plans being a lot more specific than others. This difference was often attributed to the style of individual planners and one interviewee recommended that there be more national guidance on the level of detail in plans to ensure consistency.

## 5.4 CONSULTATION PROCESS

While there was a consistent view that public involvement in plan development was important to give DOC a 'reality check', there was a view that, in practice, consultation often did not equate to the desired level of public involvement. Interviewees were asked to evaluate the consultation processes in which they had been involved. Aside from their views of the informal and formal consultation processes, interviewees commented on a number of other factors that influence the credibility and effectiveness of the consultation process.

### 5.4.1 Early consultation

A common ingredient for the success of any consultation process identified by most interviewees was that the process has a strong element of pre-consultation and that key groups are involved at an early stage. A number of interviewees gave examples where DOC had carried out extensive pre-consultation before developing a draft management plan. Stakeholders and DOC staff appeared to value the opportunity to discuss issues and developments at an early stage and prior to the formal planning process. This consultation provided an opportunity to brainstorm ideas, identify potential issues, address any concerns, and look for solutions before the formal process started. According to one DOC staff member:

*These guys are a resource, they are in the area every day, they have a lot of information, and so it's important to get buy-in.*

It was also suggested that making contact with stakeholders early in the process can help to build people's confidence to engage in the formal process of submissions and hearings.

One key ingredient for successful early consultation identified by interviewees was having the right people involved and 'shoulder tapping those key people in communities'. In some cases, DOC staff had invited representatives from national or regional interest groups to facilitate meetings and discussions; for example, the Tourism Industry Association (TIA), the Ministry of Tourism (MOT), and the Regional Tourism Organisation (RTO) were cited as having facilitated discussions between concessionaires and DOC staff. Some interviewees suggested that, as previous experiences may have made some people cynical or wary of getting involved in consultative processes, these independent representatives can motivate people to become involved.

Having a clear understanding of the purpose of early consultation was commented on by one interviewee who said that as he had spent 3–4 hours talking to DOC staff as part of the informal process, he had not put in a formal submission:

*I was naive to assume that our conversations were de facto submissions. They should have told us [that they weren't] early in the process.*

Some interviewees noted that it is also important to have the right people representing DOC in consultation processes:

*Relationships are the most important thing. DOC needs to be very careful about who fronts things.*

*The consultation process should be run by people who are good at consulting and teasing out ideas ... plans can be written by others.*

While most interviewees expected face-to-face consultation with DOC staff at the early stage of the consultation process, some noted that the focus of consultation was more important than the method. Many interviewees agreed that it was important to put boundaries around what was open to consultation and to highlight the key issues for discussion. Examples were given where DOC staff had gone to consult with communities without a clear purpose or framework for the discussion and had created confusion, misunderstanding, or anger:

*At the consultation meeting [the staff member] raised ideas and it was unnerving, they were red flags ... if you give people a blank canvas their minds will go in all directions. DOC needed to distil some of the information they already had.*

The provision of small fact sheets with summaries of the plan process and key issues was suggested as a useful resource to take to pre-consultation meetings.

Most of these meetings seemed to happen with individual stakeholders or with groups with the same interests. Some interviewees recommended this approach, as with a like-minded group there is less 'fighting' and more chance that a consensus can be reached. In one case, the DOC staff member worked with aircraft users alone and developed a policy with them as part of the pre-consultation process. The aircraft group then put in a submission of support for this policy.

In another case, an advisory group was formed, chaired by the RTO, to enable stakeholders to have an ongoing role in the planning process. A DOC staff member commented that this made the process more rigorous and helped to 'legitimise' decisions as a wider group (not just DOC) had been involved in decision making.

On the other hand, a number of interviewees suggested that there should be more opportunities for different stakeholders to work together and hear each others' views as part of the pre-consultation process. The management plan consultation process could become a forum for potential conflict between the interests of recreational and commercial groups who each get involved in order to safeguard and maximise their own opportunities and enjoyment of the park. A few interviewees argued that bringing groups together to discuss issues and problems provides an opportunity to create more integrated solutions for park management:

*For [the NPMP] there were individual stakeholder meetings, but there could also have been some targeted group workshops, as well as public meetings.*

*It can be good to hear other perspectives, especially for integrated planning ... not separate people into different interest groups.*

*We need to pick a cross section of four or five people and ask—are we going in the right direction? We should bring groups together to see opposing views in the same room. I don't like the process of seeing groups separately; it shows a lack of chairing skills.*

One interviewee commented that another benefit of mixing groups and interests is that, in hearing opposing or other views, people gain a better understanding of the challenging task involved in addressing different views within the plan.

Many stakeholders were aware of cases where there had not been any consultation prior to a draft plan being notified. Examples were provided of cases where stakeholders found out about a draft plan once it was notified in the newspaper, or where a Conservation Board was not consulted on a draft plan before it was notified. On the other hand, an example was given where an interest group declined DOC's offer of informal consultation and instead, to quote one interviewee, 'came down like a ton of bricks' in the formal submission process. However, most interviewees valued this early stage of consultation and requested that DOC give them enough notice to enable them to engage in the process.

#### **5.4.2 Writing submissions**

Once a draft plan has been notified, the public are invited to make written submissions. As mentioned previously, many of the stakeholders interviewed have extensive experience in preparing submissions and understood the formal process. There was wide consensus that people needed to have skills and experience in writing submissions, and also the time to read the draft plan and research and prepare a submission, and that it would be difficult for 'people off the street' to engage in this process.

There was general consensus that consultation processes were easier to engage with when participants had an understanding of government planning processes and plans, had experience in preparing detailed submissions, and had the time to engage in the process. In the case of one recreational stakeholder interviewed, a national representative with extensive submission experience would often write the submission on behalf of its membership.

As noted in Section 5.1, a number of interviewees discussed how difficult it would be to get involved if a person did not understand how DOC's statutory documents fitted together, did not have experience in preparing well-written, detailed submissions, and did not have time to read the large plans and prepare a submission. To help with the process, many interviewees recommended that DOC prepare a summary document showing the proposed changes from the previous plan:

*I was not aware of the previous plan but hunted it out. I wanted to see the changes from the previous plan but they were so different that I could not see the changes easily. It would be really good if DOC could have prepared a changes document.*

In addition, an interviewee commented that even if a person does not have a chance to look at the previous plan, such a document would immediately focus attention on how and why DOC is proposing to make changes to the management

of the park. The practice of providing information to the public in support of the management planning process varies between conservancies. In one case study, a DOC staff member outlined how they carried out this task:

*Once the draft plan is notified we do an analysis of what has changed since the previous plan ... so people don't need to look at the whole document ... we produce a summary of what's changed.*

### 5.4.3 Hearing

Interviewees who presented their submission to a panel in a formal hearing commented on the manner in which the hearings were conducted and their experiences of the process. There appeared to be some confusion about whether a submitter could only read their submission or whether it could be used as a forum for wider discussion:

*A lot of submitters regurgitate what is in their submission rather than use [the hearing] as an opportunity to build on it. But it's pretty hard for them, especially if they're not experienced in attending such things. People are not sure whether it is a forum for discussion or not.*

*People did not know what to expect when coming into a hearing, they found it intimidating and frightening. You could give people an idea about what to expect—something explaining what will happen in the hearing process, and who'll be on the panel.*

Satisfaction with their experience of attending a hearing varied amongst interviewees. Some stakeholders interviewed said that hearings went well, while some commented that the hearings process was 'intimidating' or 'one-sided', with no opportunity for discussion or debate:

*When you present your submission it's quite intimidating. You are by yourself and it feels like you are on trial. If they did it more in a circle ... It's that whole 'them and us' but it's not 'them and us', we are 'them', it's all our money, our parks, our places.*

*Went to hearing, which was very unnatural for me. I thought it went well and would do it again. I could add a couple more points at the hearing.*

### 5.4.4 Feedback

A common theme across many of the interviews was the need for written feedback as part of the formal consultation process. Some stakeholders commented that it took a lot of time and resources to prepare and present an effective submission and they would appreciate feedback. The pre-consultation process provides a forum for discussion and collaboration, but once the process enters the formal stage the submitter is often excluded from discussions and often does not appear to receive any feedback or information about the decision-making process. One staff member interviewed commented that there is no guidance in the legislation for feedback.

A number of interviewees commented that it was important to provide feedback in order to create understanding and buy-in to the process:

*DOC needs to let people know how their submission contributed to the process in order to create shared ownership.*

*It would be fantastic to get feedback from DOC representatives on why something is good or not good. And then to also get feedback on what was*



*accepted and changed ... When DOC decision-makers make decisions, you get letter only stating that plan is approved and here is where you get a copy.*

*I would like to see all the feedback. It doesn't need to be posted, but could go up on the Internet, and people could be told where the information is.*

*I'm positive about the running of the hearing but disappointed to see we haven't received an outcome yet (that's slack) or that we haven't even been told what's going on (that's slack and disrespectful). It's all about relationships.*

*It's a big ask of people—to come to meetings, write submissions, attend hearings—need to give them feedback on where things are at and also how their submission was used.*

*We [DOC] should provide some feedback, [it must be] disheartening. Some people prepared very detailed submissions (108 points from one) so put a lot of time and effort into it and we have not updated them!*

*It's imperative we have a public process that's transparent and influences.*

*If DOC wants people to submit again, let them know how their submission contributed.*

There was a view that if the rationale for why a decision had been made was communicated, the public may be more accepting of the decision. As there is no right of appeal once a draft plan has been prepared, it is important that feedback is provided to submitters to try and bring people on board, communicate the rationale behind the decisions, and create shared ownership. Without any feedback, people can become wary about the process:

*There is not much evidence that DOC takes notice of submissions—they are seen as a waste of time.*

In one case study, the DOC planner aimed to ensure that submitters received feedback at the time the plan was submitted to the Conservation Board:

*When we send feedback to the public it will clearly state the response to each point including where things are outside scope and what's been done with those issues.*

That planner maintained a detailed record of how decisions were reached which, in their view, made the process very transparent.

One interviewee recommended that DOC should follow another planning process where submitters are informed of the proposed decision before they attend a hearing and can then challenge and discuss it before a final decision is made.

Updating submitters was another topic raised as part of concerns about feedback, particularly given the length of time it takes for a plan to be finalised. Many interviewees were concerned about the delays and also the lack of any communication from DOC updating them on the process and letting them know what was happening:

*One problem is that it has all taken so long. We are still waiting. People had an acknowledgement letter back in July or October but nothing since. We have had nothing in the media about it since and no updates from DOC.*

*My only criticism is since the hearing—there has been zilch, nothing. What are DOC doing? What is going on? A letter—it's so little but would achieve so much in public relations.*

*People roll their eyes. It's a longer process than people in the real world are used to dealing with.*

*The biggest problem for the Department is this time gap ... way, way too long.*

*It would be nice to have had an interim letter by now—everyone can accept delays but it would be nice to know and to get a revised date. It just needs to be a form letter.*

The Internet was frequently suggested as a place to provide up-to-date information on progress of the plan review.

#### **5.4.5 Decision-making**

In general, there appeared to be a need for greater clarity around who would make the final decisions and sign-off on an NPMP, and the role of consultation in this process. Some interviewees commented on the role of conservation boards, while a few commented on the right of appeal, and inconsistencies between DOC conservancies and National Office and the NZCA. A few interviewees were concerned that when public consultation processes reach public consensus, these should then be binding on the decision makers:

*The DOC decision-maker seems to have a large amount of discretion on what is considered. Public involvement can be a charade.*

One area of the decision-making process that was of concern to several conservation board representatives was the varied nature of the boards' involvement in developing NPMPs. In some areas, board members are actively involved in the pre-consultation, submissions, and hearing process, while in others, they are kept at a distance. According to one board member interviewed:

*The Department needs to pay more than lip service to the board and get them on board right from the beginning so things can be worked through before they become an issue. Some boards are more active and want a greater role—it totally depends on skills and interest of the board. With one plan, the Board has been kept at arms length at the early stage of the plan, despite jumping up and down.*

However, another board member commented:

*The Conservation Board is always part of consultative meetings with stakeholder groups. We go along, engage, bear, understand.*

Board members interviewed generally favoured a more collaborative approach where members had greater buy-in to the decisions being made.

The right of appeal was another component of decision-making that received some comment. Several stakeholder interviewees were concerned that there was no right of appeal once the decisions had been made and there was no access to the conservation board or NZCA after the hearing. The need for an open, democratic process was strongly emphasised by some stakeholders, and a suggestion was made that an appeal could happen before a draft plan was sent to the NZCA. Some interviewees believed it was too late to make changes once

it had reached the NZCA, and this has the potential to undermine and destabilise the consultation process and trust between DOC and the community:

*In an ideal world there should be opportunity for right of appeal for the draft plan, perhaps after it's gone to the Conservation Board and before going to the NZCA. If there is one point that people really don't agree with, then they can appeal. This links in with people getting feedback.*

One concern about the NPMP review process raised by a few interviewees was that decisions made by conservancies in consultation with local communities could be significantly amended without any need for further consultation with the local communities. There appeared to be differing perspectives amongst DOC staff about how binding consensus reached during the consultation process is, as shown by the following comments from staff from different conservancies:

*I developed good policy with them [user group] but made it clear that this would still be tested through the public process.*

*Have statutory process but adding the advisory group made it a more rigorous process ... so had this group, people in the industry making decision. Created 'legitimisation' of decisions. These people made the decisions.*

## 5.5 RESOURCES AND CAPACITY

Interviewees were asked to comment on whether DOC and stakeholders have the resources and capacity necessary to effectively engage in a consultation process. Most of the comments made by interviewees focused on DOC's capacity and capability.

In terms of community stakeholders, as previously discussed, many of the stakeholders interviewed for this research consider themselves to have the skills and resources to engage in the process. It was suggested that smaller community groups, some iwi/hapū or new and emerging stakeholders may not have the knowledge or capacity to handle the complexities of DOC's policy and planning processes. As suggested by some interviewees, face-to-face informal consultation, fact sheets on NPMP issues, information about the submission and hearing process, and documentation of changes since the last plan would all assist in building knowledge and skills.

In relation to DOC's resources and capacity, many interviewees expressed frustration with the lengthy timeframes and delays and thought that they were due to a lack of staff to complete the work. Difficulty recruiting planners, combined with high staff turnover and a perceived low priority put on NPMPs, were common reasons given for a lack of momentum and progress in plan development:

*DOC doesn't resource it. I hate to think how many planners they had through this period. Planners are trying to do the plan as well as rest of their work.*

*There is a serious lack of continuity as people who start the process don't see it through. This has the potential to create serious problems for DOC and CB. It began in year one and it's now year nine.*

*DOC never seems to have enough staff. The process falls over by delay. We should have finished 12 months ago. Because it takes so long the people who wrote submissions are heartily fed up with it.*

Where planners were the only staff working on NPMPs, there were some concerns that they may become isolated or take ownership of the document and this made it difficult to undertake an open collaborative consultation process:

*This is a problem for the Department; every park plan is a planner's personal published thing that they take ownership of.*

*Need a good team. It's difficult with one person. It's their baby. Difficult to accept criticism.*

A number of examples were provided where DOC staff worked as a team on an NPMP with less personal ownership of the document. As noted earlier, it was also suggested that the planner is not always the best person to lead and facilitate a consultation process and a team-based approach meant that someone with facilitation and community engagement skills can lead that part of the project:

*DOC is historically lacking in people management skills. People at management level have often come up through the ranks and DOC hasn't paid enough attention to training for these people to develop public consultation skills, and it is a skill. Some come across very badly in the public meetings.*

## 5.6 REPRESENTATION

Interviewees were asked to comment on whether the breadth of public representation in the review was adequate<sup>9</sup>. There was a common view that NPMP consultation could best be described as stakeholder consultation, rather than general public consultation. A number of the stakeholder interviewees commented that DOC could spend a lot of time and resources contacting groups and individuals who may not necessarily be interested in the process:

*It is a balance between doing nothing and going full on.*

*We [DOC] can beat ourselves up about how we get more people to get engaged.*

*I'm less than convinced that there is an appetite for many more people to be engaged. It sits down the scale from public involvement in the local hospital or school closing.*

*In the outdoors you see few low income, less educated people, or other [i.e. minority] ethnic groups. It is white middle class New Zealand using conservation land. Those who don't use it might value it but don't have the knowledge [about an area or plan] to submit. Submissions need to be very specific and detailed—the park plan process is really targeted at those who know and use the area.*

*It's [public input] really about two things ... one, it's about getting people involved in the front and back country, and two, it's also about getting people involved in management. You need to get them using before can get*

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<sup>9</sup> Interviewees did not necessarily know who had been involved in the review process, and therefore what its breadth was.

*them involved in planning and direction setting. DOC should put energy into promoting use, then focus energy on those who use conservation lands for direction setting.*

There was a common view that it was better for DOC to target its consultation to key stakeholders and to ensure all these stakeholders have equal access to the process.

A number of interviewees reiterated the importance of the NPMP review process providing opportunities for DOC to work collaboratively with all stakeholders and to bring interest groups together. One stakeholder suggested that DOC have a list of groups to consult with to ensure everyone is aware of the process:

*We just happened to see the NPMP advertised, it was already locked in ... It would be good to have a template for every consultation—'here are the stakeholders and this is how we do it'—so we don't find out by accident there is a plan underway. A partnership process ... should have a list of people you will contact as part of the plan review.*

It was also considered important for DOC to realise that key stakeholders in an area will change and evolve over time and that it is always important to look for new and emerging groups. One DOC staff member, for example, told how there was less interest in a recent NPMP review process from tramping clubs, but that the Women's Institute and a four-wheel-drive group had got involved.

The role of Māori in DOC's planning processes was raised by a number of interviewees. They commented on the importance of section 4 of the Conservation Act being reflected in management planning, and the difference between stakeholder consultation and partnership. These interviewees held the view that Māori are not stakeholders but should be seen as partners in the planning process, including in decision-making. As partners, they are therefore less likely to make a formal written submission:

*As iwi we are not part of the public and we are not a stakeholder. We are a partner.*

*As iwi, we are involved right from the start, face-to-face meetings.*

*A natural tension there—how section 4 of the Conservation Act is reflected in management planning ... section 4 is the key, should be integrated throughout the plan.*

## 6. Applying the evaluation criteria to the survey and interview results

The objectives of this study were to look at the barriers and opportunities for effective public participation in the review of National Park management plans, and make recommendations to improve DOC's practice of involving the public in this statutory planning process. To enable effective participation, it was concluded that a review process needs to incorporate the suite of principles for public participation discussed in Section 2. In this section, the nine evaluation criteria developed in Section 2—representativeness, influence, purpose and decision-making, timeliness, early involvement, feedback, information, effective forums, and enabling process—are applied to the findings from the survey of submitters, interviews with key informants, and our understanding of the processes followed. Where appropriate, the discussion will compare these findings to those from previous studies.

### 6.1 REPRESENTATIVENESS

**Public participation must involve a broadly representative sample of the affected public. This means that all parties with an interest in the issues and outcomes of the process are involved throughout the process. A sound process ensures that the full spectrum of the public's opinions and values is exposed.**

James (1990) distinguished between two types of representation: **demographic representation** (which relates to the patterns of age, sex, ethnicity, etc., observed in the public at large and the extent to which these are reflected in the people involved in the consultation process) and **interest representation** (which relates to how adequately the various interests groups involved with a particular park and affected by any decisions are included in the consultation process).

In terms of demographic representation, this study found that survey respondents were predominantly European, older (with nearly two-thirds being aged 50 years and over), and male (about three-quarters). Women, younger people, and other ethnic groups were significantly under-represented. The survey found that, in relation to interest representation, outdoor recreation groups were the largest group type represented by both organisations and individuals (40%), with environmental and business interest representation being much smaller (about 12% and 16%, respectively).

Staff and stakeholders generally agreed that the consultation processes employed by DOC could best be described as stakeholder consultation, rather than general public consultation. Best practice information within DOC also seems to focus on stakeholder consultation. Stakeholder consultation was largely supported by the stakeholder interviewees who generally argued that consultation on NPMPs should be targeted at key stakeholders, not the 'general public', and that it would be difficult for the 'general public' to engage in the process. They argued that, as stakeholders, they were more likely to have the skills, expertise, and resources to

participate in the planning processes. It is important for DOC to recognise that stakeholders change over time—new ones emerge, old ones fade. Without some form of public input, new stakeholders are unlikely to be identified. In addition, there will be people who may never use a national park, but who value these areas for what they represent, and be interested in their management. As part of each review process, DOC will need to identify new and emerging groups.

It is notable that Māori interests seem under-represented at the formal submissions stage. This does not necessarily mean that there is no Māori involvement in DOC's statutory planning processes. In each of the review processes, DOC appeared to consult with Māori early on in the process and throughout the review. It may be that Māori are satisfied with the direct consultation occurring throughout the process, or it may be that the submission procedures discourage Māori (Heatley 2007). Based on comments by some of the interviewees, Māori consider their role in the process as partner, and not stakeholder or general public. This issue requires further investigation by DOC, as it may affect the way people perceive influences on DOC's statutory planning processes.

The findings from the study suggest that DOC's consultation processes are not demographically representative, and all interests are not sufficiently represented. They indicate that DOC needs to decide at what level it aims to have demographic representation, and it will need to focus on improving its interest representation. A narrow participant base may lead to inadvertent favouritism (James 1990), with those groups or stakeholders that are knowledgeable about political processes and decision-making, and organised and articulate, predictably having an advantage over others. Ensuring that there is broad representation will help to reduce the potential for unequal influence. As DOC begins an intensive period of CMS reviews, having adequate public and interest representation will become increasingly relevant, as the next generation of CMSs places particular emphasis on understanding the wide range of values that exist for conservation areas.

## 6.2 INFLUENCE

**Issues of concern to the public, and relevant to the decision at hand, must be taken into account in reaching a decision. Public input is used in the development and evaluation of options and public contribution has a genuine impact on the decision. It is important to ensure that stakeholder and public participation is, as much as possible, on an equal basis with that of administrative officials and technical experts (within legal constraints).**

When survey respondents and interviewees were asked about perceived bias in draft management plans, the survey results show a fairly even division of responses between those having a neutral view, those who stated that the plan was unbalanced, and those who believed the plan to be balanced. Without being conclusive, the findings suggest that there is at least some perception of bias in the process. Similarly, when asked to identify strengths and weaknesses of the process overall, similar proportions of respondents and interviewees thought the open and accessible process was a strength (12%), while political interference was seen as a weakness (9%). About one-tenth of respondents recommended that, as an improvement, the process should be more open with less political interference.

The written submission was by far the preferred way to participate, as participants recognised that written submissions were the formal statutory input into the process and therefore the main way to have influence. This perception is likely linked to what survey respondents and interviewees believed was insufficient demonstration by DOC that people's views obtained in the pre-drafting stages of the process were considered and (where relevant) reflected in the draft plan.

The findings from the survey and interviews suggest that whilst there was some sense of unequal participation and influence in the management planning processes, this seemed to be associated more with the lack of feedback (examined further below) provided, so that participants did not know whether or how their input had been applied. Lack of feedback may well breed 'conspiracy theories'.

Heatley (2007) questioned whether DOC should be in the business of conflict resolution as a result of public input into plan reviews. Conflict can be managed more effectively with appropriate planning for public participation and identifying appropriate values early in the review process (IAP2 2006). Resource management is inherently complex and there will always be conflicting interests. Early consultation should help identify the range of values early in the process. Unequal influence can be reduced by a process that is transparent, and in which each participant is clear about the objective of their input.

### 6.3 PURPOSE AND DECISION-MAKING

**The participation process must be driven by a shared purpose amongst the participants and with the nature and scope of the participation task clearly defined. This includes ensuring that the process is transparent so that the public can see what is going on and how decisions are being made. Procedural ground rules and roles of the participants should be clearly defined.**

There are three levels to which the concept of purpose applies in this study. The first of these is the purpose of having public involvement in DOC's management planning processes, as required statutorily. A second level of purpose relates to the function of a particular management plan, i.e. the purpose of a NPMP compared with that of a CMS or general policy. The third level of purpose refers to each time a review process is conducted: what are the decisions in this plan which require public input and how will the public contribution be considered?

The principal basis for public involvement in DOC's management planning is to meet the minimum statutory and policy requirements of the Conservation and National Parks Acts. There are, however, many reasons why DOC expects the public to be involved in the review of management plans, for example:

- DOC manages public conservation lands on behalf of the public
- It is important to get the best information from the community
- DOC needs to hear new ways of looking at an issue, by listening to community perspectives
- DOC wants to hear a wide range of perspectives
- DOC wants its plans to be accurate and relevant
- DOC wants to run an efficient process (DOC & NZCA 2006: 6).



Having such a range of explicit and implicit drivers for involving the public can be difficult (Heatley 2007). The overarching driver should be how the statutory planning processes (and associated public consultation) contribute to improved plans and thereby better conservation outcomes.

A number of the interviewees questioned whether ‘management plan’ was the correct term for a NPMP and described it as more of a strategic document. There was also a common feeling that there were too many plans, with a lot of the detail in NPMPs repeated in CMSs and the general policies. The function of each plan or strategy under consultation needs to be made more explicit, and this is likely to become a bigger issue as DOC embarks on its next generation of CMS reviews. The Department of Conservation should ensure that each level of a planning document accurately reflects its purpose. Participants in the process expect to submit on meaningful information and, equally, the management planning process is the only statutory opportunity for the public to have input.

There was wide agreement that NPMPs need to be reviewed regularly to reflect changing values and demands and that the public needs to have an opportunity to contribute to this process. It is essential for DOC to establish clear parameters around the purpose for seeking public input—what is in and what is out of scope, and how the public’s input will be used in drafting the plan. The findings from the interviews particularly highlighted that there is variability in the ‘promise’ that is made to participants in the process and the role of public input in decision making; for example, some DOC staff and stakeholders argued that where agreement has been reached during a public consultation process, neither DOC nor the Conservation Board, or the NZCA, should be able to change the outcome. Unclear and/or unrealistic expectations of the role of public input into the planning processes are likely to lead to participants being less willing to contribute in the future and a sense of ‘being cheated’.

It is important that DOC staff clearly consider the purpose of the consultation prior to each NPMP consultation. The definition for consultation in the general policies (Section 1.1) and the promises described in the IAP2 Public Participation Spectrum (Section 2.3) provide useful guidance to help identify and explain the purpose of public input.

While not discussed in detail during the interviews, there appeared to be some issues around the clarity of the decision-making path, and how Conservation Boards and the NZCA are involved in the process. The way boards participated in the public consultation phase varied, and there appeared to be inconsistent understanding of the multiple statutory functions boards carry out in NPMP reviews (National Parks Act s46–47). Fact sheets to assist staff, boards, and the public in understanding the role of a Conservation Board in CMP, CMS, and NPMP reviews (DOC 2008) have recently been released by DOC. This information was not available during the NPMP reviews considered in this study. These fact sheets may go some way to achieving better clarity of DOC’s decision-making processes, and public consultation processes altogether.

## 6.4 TIMELINESS

**Realistic milestones and deadlines must be managed throughout the consultation process. It is also important to allow sufficient time for meaningful consultation with iwi.**

Both survey respondents and interviewees commented on the length of the review processes, with the length of time it takes for a plan to be finalised being seen as a significant weakness. This criticism is accentuated by people not receiving updates during the process, or feedback on how their submission was used. The slow process and lack of feedback is likely to result in people losing interest, and not bothering to participate in subsequent review processes. The public involvement component concludes for the majority of participants when their written submission has been put forward, or following the hearing for some. It may be difficult for participants to understand the lengthy time frames involved in these processes, particularly when they are not sent updates.

The concern about the length of review processes is confirmed by the timeline for the NPMP review processes assessed for this study, which highlight the lengthiness of the process, as shown in Table 13. The shortest NPMP took over 3 years to be approved, and two of the case-study plans are still awaiting completion. The periods between suggestions closing and the draft plan being notified, and the closing of the written submission to the plan being approved, are generally when the time delays occur.

Associated with the lengthiness of the review processes is the issue of relevancy. At the time of this study, four national park plans had been in place for more than 10 years. The Whanganui NPMP had been in place for 8 years. The Fiordland NPMP, approved in 2006, replaced a plan that had been in place for 16 years. These delays call into question the timeliness, effectiveness, and purpose of the whole process (Heatley 2007).

While still allowing sufficient time for people to be able to participate effectively, more effort needs to be made by DOC to ensure that the review processes do not drag on, as they sometimes take as much time as the life of the plan itself. It is essential that the time periods for national park plan reviews are reduced, and two areas where improvements can be made are in increasing resources in this work area and introducing legislative timeframes.

TABLE 13. TIMELINE OF FIVE NATIONAL PARK (NP) AND ONE FOREST PARK (FP) MANAGEMENT PLAN REVIEWS.

PLAN	NOTIFIED (1)— INTENTION TO REVIEW → SUGGESTIONS CLOSING	SUGGESTIONS CLOSING → NOTIFIED (2)— DRAFT PLAN	NOTIFIED (2)— DRAFT PALN → SUBMISSIONS CLOSE	SUBMISSIONS CLOSED → HEARINGS	HEARINGS → PLAN APPROVED	TOTAL PERIOD
Tongariro N.P.	2 months	9 months	2 months	2 months	41 months	4 years, 8 months
Whanganui N.P.	2 months	35 months	2 months	2 months	19 months+	> 5 years
Arthur's Pass N.P.	2 months	18 months	2 months	3 months	22 months	3 years, 11 months
Fiordland N.P.		42 months	3 months		52 months	8 years
Abel Tasman N.P.	1 month	9 months	4 months	3 months	28 months	3 years, 7 months
Kaimanawa F.P.			3 months	1 month	14 months	1 year, 6 months

The length of time it takes for an NPMP to be finalised was often attributed to a lack of planning resources within DOC and the low priority given to planning. The Department of Conservation will need to ensure that this work area gets a higher priority and the necessary resources.

The National Parks Act prescribes only one statutory timeframe for the review of an NPMP, which is a minimum period of 2 months for seeking written submissions. Improved resourcing in DOC should be complemented by amending the National Parks Act requirements for management plan reviews to include a prescriptive time period for these reviews. This could reflect the requirements for CMSs and CMPs in the Conservation Act, which prescribes a period of 8 months from the date of notifying a draft plan to its going to the Conservation Board (this includes a minimum of 40 working days for written submissions). The Conservation Board then has 6 months to consider the draft CMS before sending it to the NZCA. Any extension to these timeframes needs to be approved by the Minister of Conservation. Having a statutory timeframe should ensure that comprehensive and inclusive early consultation takes place, so that the timeframes can be met and not be hampered by unexpected or unforeseen issues raised by the public. However, any statutory timeframe should not be used as an excuse to avoid comprehensive consultation for fear that this takes too long.

## 6.5 EARLY INVOLVEMENT

**The public must be involved early and its involvement must be maintained throughout the planning process.**

Early, informal consultation with stakeholders was highly valued by those interviewed and surveyed, as it provided an opportunity for DOC and stakeholders to build relationships and address any potential issues and problems before the formal planning process began.

Survey results show that 48% of those surveyed provided feedback or suggestions to DOC at the initial (consultation) stage of the review, while about two-thirds received some form of initial information. Meetings were less used, with only 24% attending a public or interest group meeting at this stage, although these were generally considered to be helpful. There is potential for DOC to proactively engage with the public at this early stage of the process.

Early involvement should also assist with the issue of timeliness raised above. The better prepared and more proactive DOC is in seeking public input and understanding the range of values affected by the management plan, the less likely it is that there will be delays in the process caused by conflicts that could have been foreseen and avoided.

At the same time, DOC will need to demonstrate that it has considered public input at the pre-consultation stage. The public also needs to be reminded that, irrespective of whether it was involved in the early consultation phases, its members should still submit a written submission (including where they are in support of interventions).

## 6.6 FEEDBACK

### **The public participation process communicates to participants how their input affected the decision, and how the process is progressing.**

Concern about the lack of feedback came through strongly in both the survey and from the interviews. Feedback sought by respondents and interviewees included receiving regular feedback during the process, being notified about how the submissions were considered and how the final decisions were made. The concern about lack of feedback was exacerbated by the lengthiness of the review processes.

More than half (55%) of survey respondents said they had not received feedback on their submission. Of those who had received feedback, 40% considered it to be useful and, importantly, most of those who had not received written feedback on their submission (70%) said that they would have found it useful. There was a lot of variation in feedback between the plans—nearly all Arthur's Pass submitters (92%) reported having received feedback, this proportion was 68% for Fiordland, and 44% for Tongariro. Formal feedback had not been provided to Abel Tasman and Whanganui submitters at the time of our survey. The fairly low response for Tongariro may be due to difficulties of respondents recollecting whether they had received feedback, as the review process was completed some time ago.

The issue of at which stage during the process DOC should provide feedback about how submissions were considered was raised in the interviews, particularly as there is no legislative guidance for this. Some of the interviewees asked for feedback prior to the hearing. The National Park Act (s47) does require that, when DOC sends the draft plan to the conservation board, it also includes a summary of submissions and how public contributions were considered. The practice of providing feedback appears to be quite variable. If a conservancy waits until a plan has been approved by the NZCA before providing feedback to submitters, this can be months, if not years, after the public contribution component of the process has been completed (see Table 12). For the Arthur's Pass management plan review, the conservancy sent feedback to submitters at the time the plan was submitted to the Conservation Board. This was commented on favourably by interviewees.

The lack of feedback was already identified as a concern in previous studies looking at DOC's consultation processes (James 1990; Airey 1996; DOC 1998). James' (1990) investigation of public participation in DOC's management planning in particular found that participants were dissatisfied with the lack of feedback after they had made submissions. James strongly argued that '**poor feedback, probably more than any other factor, influences submission-makers to judge their participation experience negatively**' (James 1990: 39) and recommended that adequate feedback should be provided to participants after submissions have been received.

The lack of feedback (and the lengthiness of the review processes) requires urgent attention by DOC. As there is plenty of best practice guidance available to staff (DOC & NZCA 2004a, b; IAP2 2006; OCVS 2008), it is not suggested that a legislative change is required at this stage. Feedback should be provided regularly (but within reason) throughout the process. Participants should be asked how and what kind of feedback they would like. Providing updates on progress on

DOC's website may be a useful tool, but this will need to be accompanied by direct contact with the participants in the process (by email or letter), as the survey findings show that participants respond well to direct contact. As there tends to be a considerable delay following the conclusion of public participation and the plan being approved, it would be useful to send submitters a summary of the key issues raised in the submissions, and how the draft plan was amended by DOC to reflect public submissions and opinion. As this information is provided when DOC presents the draft plan to the Conservation Board, this should not be a significant burden on DOC staff. It will be important for DOC to encourage consistency of approach by all conservancies. When a plan is approved, participants in the review process should be notified, as is already the case with CMS reviews. It is therefore recommended that the DOC amends its CMS Best Practice Manual (refer Section 2.1.2) to incorporate guidance for NPMP reviews, and that two stages of feedback to participants are included: a summary of the key issues raised and DOC's responses at the time the draft NPMP is sent to the conservation board, and a short note when the NPMP is approved.

## 6.7 INFORMATION

**Participants have the information they need to participate in a meaningful way. High-quality and understandable information is available.**

Information is provided by conservancies to the public at various stages of the planning process. This includes the minimum statutory requirement of a public notice in newspapers that DOC is intending to review a national park plan, and a second public notice stating that the draft plan is available for written submissions. Information provision at the pre-draft stage is variable; some conservancies make summary information available about the process and/or the key issues, while others prepare a discussion document. Conservancies then decide how many and what kind of public meetings to hold. This decision seems to relate generally to the quality of public relations and the level of resourcing in conservancies, and the types of issues involved (e.g. local, national).

Overall, those who currently participate in the NPMP process find the amount and type of information provided to be satisfactory. The majority of respondents and interviewees considered that the draft plan contained sufficient information to enable them to write a submission.

Many respondents became involved in the review process through membership of a group or club, after receiving a hard copy of a public notice directly from DOC, or after seeing a public notice in a newspaper or other publication (see Fig. 12). Only 5% saw a notice on the DOC website. In addition to the information provided, the majority of respondents used personal experience as a key source of information in the formal submission phase. There appear to be opportunities here for DOC to increase public involvement in the planning processes by building relationships with a wider range of clubs and organisations, and by increasing public involvement in conservation.

Interviewees in particular noted that it would be helpful to know how proposed changes differ from what is in the previous NPMP. Providing a summary of proposed changes provides DOC with an opportunity to highlight its achievements during the preceding 10 years, and to validate the course of action it is promoting in the new plan.

There are numerous resources available to DOC to assist with ‘fitting’ information to particular audiences; for example, the best practice material discussed in Section 2.1.2, DOC’s own expert staff, IAP2 resources (IAP2 2006), and government engagement guidance provided by the Office for the Community and Voluntary Sector (OCVS 2008). The way that DOC communicates with the public will increasingly depend on its understanding of its audience, especially if public representation is broadened. New approaches may be required. Improved communication will require effective communication planning, and communication styles appropriate to the various stages of the review process. For example, at an early stage of participation, the goal may be to provide the public with balanced and objective information to assist it in understanding an issue. At the end of a consultation process, people will need to be informed about how and why their input affected the end result, and what will happen now. It is important that the communication goal is clearly understood.

## 6.8 EFFECTIVE FORUMS

**To enable effective participation, a variety of techniques for giving and receiving information must be used, including face-to-face discussion between parties.**

The statutory planning process requires DOC to provide an opportunity for members of the public to provide written submissions and that, where possible, to also make hearings available. The ways to make public participation effective are generally prescribed through DOC’s best practice guidelines (DOC & NZCA 2004a, b). Meetings are organised at the pre-draft stage, and formal consultation once the draft is released. These vary from one-on-one meetings, to targeted stakeholder meetings, and public meetings targeted at the general public.

Both survey respondents and interviewees strongly supported submission-making as the primary method of participation in national park management planning and said that they had had adequate opportunity for involvement. However, both groups also favoured early consultation and meetings between DOC staff and members of the general public and interested groups. About one-fifth of survey respondents attended either a pre-draft meeting or a meeting on the draft itself, with the majority saying they found these meetings helpful. Barriers to attending included location, not knowing about the meeting, the time or date being unsuitable, or there not being a meeting available. Interviewees commented that ‘public’ meetings seemed to be about stakeholder consultation, rather than being true public forums. This is reflected in DOC’s best practice guidelines, which provide a list of participants that should be consulted as the norm; this does not include the general public (DOC & NZCA 2004a, b). Interviewees requested both targeted group workshops as well as meetings with a range of interests represented. There did not appear to be a strong demand for general public meetings; rather, interest-based group meetings would seem to be more useful. However, this view may reflect the point that those involved in the research were already partaking in the process, and that views of non-participants may be different.

Greater clarity about the purpose of hearings and what is expected of submitters is required. This study found that there is confusion about the purpose of hearings—whether they are only for submitters to read their submissions at, or whether they

are a forum for wider discussion. The approach to hearings does appear to vary across DOC, with some conservancies using them as an opportunity to further discuss particular issues, while other conservancies constrain contributions to participants presenting their written submission verbally.

If DOC is going to invest time and resources in meeting with the public, and to ensure that all participants can contribute effectively, it is important that the purpose of each meeting and forum is clear and that all attendees can participate equally and effectively. Interviewees made the point very strongly that for forums to be effective the right people must be involved, and they advocated a team approach. In addition to the planner (who generally runs the consultation process), DOC should ensure that other staff are also actively involved when undertaking public consultation. Staff with a range of skills, for example, experienced facilitators, community engagement staff, technical staff, and planning experts, should also be involved.

## 6.9 ENABLING PROCESS

**The process for public participation enables those people and groups potentially affected by or interested in a decision to be identified, and facilitates their involvement in the consultation process. It seeks input from participants in deciding how they participate (within the legislative boundaries). The process provides for equal and balanced opportunities for all parties to participate effectively. The participation process is conducted in an independent, unbiased way.**

The majority of survey respondents said that they had adequate opportunity for involvement, and there was strong support for more participation at the early consultation phase. People valued discussion with DOC and other interests together, as well as discussions directly with DOC. The majority of respondents considered that the draft plans contained sufficient information to enable them to make a submission. Overall, the process was seen to be open and accessible, with opportunities for public and/or consultation meetings.

There may be an issue with resource accessibility. Both survey and interview respondents commented on access to meetings and/or hearings being restricted because of unsuitable locations or times.

While the process appears to be reasonably enabling for the cohort of people who currently participate, the findings of our study suggest that it may not be enabling for the wider population, and that there is room for improvement in this area. For example, at the beginning of a review process, DOC should seek input from stakeholders on how they wish to participate. This will also help to identify the types of resources, including information, that are required to allow participants to be involved effectively.

## 7. Conclusions and recommendations

This study looked at the processes for public involvement in DOC's national park management planning processes and their effectiveness. It needs to be remembered that public participation is not an end in itself but, rather, a means to an end. Its purpose should be to ensure that DOC, as the decision maker, is fully informed and that DOC's statutory planning processes lead to improved conservation outcomes, in the widest sense. Effective public participation provides a means for including the public's values into decisions that affect it, and enables meaningful input into the decision process.

### 7.1 FRAMEWORK FOR PUBLIC PARTICIPATION

This study developed from the definition for consultation in the general policies (Section 1.1). This definition clearly sets the parameters for the role of public input into DOC's statutory management plans. It requires DOC to actively seek advice, allowing sufficient information and time. This consultation involves ongoing dialogue; it is not a one-off occurrence. The purpose for public input is also clearly stated:

*... it does not necessarily mean acceptance of those views, but it enables informed decision-making by having regard to those views.*

To aid with the planning for, and carrying out, of an effective public process, the IAP2 participation spectrum was considered to be relevant to DOC's statutory management plan review process (Section 2.3.1). This spectrum provides a platform on which to consider the purpose for and type of public input sought. The different stages of the spectrum reflect different purposes for seeking public input, and the approaches used vary depending on the stage and purpose. The application of the IAP2 spectrum to DOC's work is further explored in the *Engagement Story Report* (DOC 2010).

The development and application of the nine evaluation criteria (which incorporated the general policies' definition of consultation) enabled a number of constraints and facilitators for effective public participation in DOC's statutory planning processes to be identified. Each of the evaluation criteria is critical in enabling or impeding effective public participation. These will be discussed below, followed by a set of recommendations.

### 7.2 CONSTRAINTS

Unfocused consultation can act as a barrier to effective public participation (Johnson 2001). Particular issues in this area include the scope of public input being undefined or too broad, participants being unclear about the process itself, and lack of agreement and understanding on the role and responsibilities of the participants. The Department of Conservation needs to be clear about the purpose for involving the public and the exact areas for which it is seeking public input. Greater investment needs to go into planning for public participation, involving staff with the appropriate skills, and committing appropriate resources.



While those who currently participate in DOC's statutory planning process appear to be largely satisfied with the process, this group is not sufficiently representative of the whole New Zealand population, or of all the interests involved in conservation management. Under-representation means that not all values are considered in DOC's decision-making, and a lack of meaningful input in the planning process from a variety of sectors of the general public may lead to barriers to successful conservation management. More needs to be done by DOC to understand its community (regional and national), and to seek involvement from interests beyond those it already knows and understands. Those people who currently engage with DOC are older—DOC needs to plan to involve younger generations.

The perception of unequal influence can also be considered a barrier to effective public participation (Johnson 2001). This presents itself as some stakeholders having or seeming to have more influence than others, DOC being perceived as paying 'lip service' to public interests, or the review process becoming about conflict management. There will be 'givens' in any review process; for example, some aspects of the planning process cannot be altered or issues have a legal basis. There should therefore be a common understanding about the purpose of involving the public and which decisions the public can affect. In addition, DOC needs to be seen to consider public input so that the draft and final plan are not seen as pre-determined. One way to address this concern would be for DOC to use an independent facilitator for public meetings, workshops, and hearings to impart greater independence as part of the consultation process, although this is not considered a necessary step here. What is important is for staff involved in these processes to act professionally and provide an assurance of independence. In addition, providing regular and earlier feedback, as discussed above, would certainly be one way of addressing or managing perceptions of unequal influence.

This study found that participants in the national park planning process valued having contact with DOC, but their access to meetings and the way that these were conducted were of concern to some. In particular, there was concern that meetings did not enable a real two-way discussion between the public and DOC. Participants favoured meetings where a meaningful discussion about an issue could take place with a frank exchange of views, including the opportunity to hear the views of others. When writing submissions, respondents tended to use personal experience and the content of the draft plan to inform their submission; information from public meetings was not used as much as it could be to inform written submissions. Information obtained from group and individual meetings with DOC was used more, but still less than the draft plan and personal knowledge. Lack of access to meetings and hearings was also stated as being a barrier; in particular, the location and timing of the meeting being unsuitable. Cost of attending (e.g. through loss of income, or the cost of travelling to the meeting) was also a barrier.

The length of time it takes to complete management plan reviews is a further and significant barrier to participation. The length of the review process was particularly commented by many participants who did not receive updates on the status of the review. As discussed in Section 6, one way to reduce the timeframes for an NPMP review is to amend the legislation so that each stage of the review process has a statutory timeframe; another is to ensure that this area of work is adequately resourced and afforded sufficient priority by DOC.

James (1990) singled out lack of feedback as a serious barrier to how the public viewed its participation in statutory planning review processes. The present study again identified lack of feedback as a significant barrier to public participation in NPMP reviews, and that the level of feedback submitters experienced was insufficient to keep people informed about progress during the process. In addition, submitters were unclear how submissions were considered by DOC in the final plan. However, where feedback was provided, this was valued and it is therefore considered to be an important facilitator to effective public involvement. The Department of Conservation will need to provide people participating in review processes with information about how individual submissions were considered, and what has been changed and/or accepted in the final plan.

### 7.3 FACILITATORS

In general, the practices presently employed appear to suit those people who currently get involved in DOC's NPMP reviews. The study participants strongly supported submission-making as the primary method of participation. They also supported the range of consultation methods used in the case-study reviews.

The study has found a significant link between how much personal experience and knowledge people have about places and how likely they are to get involved in statutory planning for these places. People value getting involved. A more engaged public in conservation should lead to more input into management planning, and the reverse may also apply.

The majority of participants considered that the draft plan contained sufficient information to allow them to make a submission. The information received generally helped them to understand both the review process and the issues covered.

The process was seen to be open and accessible, with opportunities for public and stakeholder meetings.

People value being contacted directly by DOC (as individuals or through interest groups). In seeking engagement from people in the statutory planning processes, DOC should actively facilitate involvement, particularly when reaching out to new people or groups. It should not rely on passive approaches such as posting on the Internet for initially notifying review processes (although the Internet could be a useful tool to keep people informed once the process is underway).

Participants particularly supported holding a meeting to discuss the content of a plan prior to it being drafted, as well as the meeting at which the draft plan is discussed.

Early consultation was favoured, as many participants thought this would help shape the plan.

Discussion between DOC and other interests was also favoured. Meetings were seen as being useful for hearing the views of both DOC and others.

## 7.4 RECOMMENDATIONS

A number of recommendations can be made to improve DOC's approach to seeking public input in its statutory reviews of NPMPs. These improvements largely relate to how the Department itself approaches the review processes and public engagement as part of those reviews. The recommendations that follow therefore specifically refer to planning for public input, which includes having the right people. They do not include recommendations about specific methods or techniques, as these will flow on from being clear about the purpose of public engagement and the 'publics' that will be engaged as part of the process. The first two recommendations reflect the main concerns expressed by those who currently engage in NPMP planning processes.

1. Timeliness of management plan reviews was raised as a serious concern by participants in this study. Timeliness refers to both the length of the review process, and the length of time a plan ends up staying current. These can only be improved by DOC committing to ensuring plan reviews are completed within a reasonable period of time. Legislation change to establish statutory timeframes for the NPMP review process may be required. Consistency with the timeframes outlined in the Conservation Act for CMS and CMP processes would be useful.
2. For any public consultation to be successful, DOC must provide feedback to participants. Feedback must be provided throughout the process, and include updates on progress with the process, acknowledging the receipt of written submissions (which generally already occurs), and details of how submissions were considered (this can be a general response sent to all submitters or a specific response to each individual submitter). It is therefore recommended that feedback is provided at the time the draft NPMP is presented to the Conservation Board, as DOC already has to prepare a summary for the Conservation Board's consideration.
3. It is critical that why and how public input is to be sought is planned for—so that people running the review are clear about the scope of the review, the review process, and which decisions are open to public input. The application of the IAP2 spectrum can be very helpful in this. A well-planned process will mean that public input is valued and meaningful and that DOC staff and the public have a shared understanding of the purpose for consultation and the function of the plan.
4. Conservancies need to be more informed on the demographic make-up of the people and communities with which they are engaging. Conservancy-specific population profiles are being developed, and DOC should use these to assist in understanding the communities with which it needs to engage. These demographic profiles are necessary for planners to ensure that they understand possible changes in their communities, and to enable appropriate stakeholder and public representation.
5. The NPMP review process has several statutory steps involving different decision makers. Their roles and responsibilities appear to be confusing to stakeholders, DOC staff, and conservation boards alike, and it is important to have these clearly articulated. DDOC must make it clear who the decision-maker is at each stage in the plan review process, and how decisions are made.

6. Effective public input requires sufficient staff and the right skills. An NPMP review should not depend on one staff member. A team approach is recommended, involving staff with varying skill-sets, and it is essential that at least some staff have public engagement skills.
7. To improve practice, it would be prudent to do a process and outcome evaluation at the completion of each NPMP review. A standard evaluation can be developed to reduce the burden on DOC staff and to enable comparisons to be made between the various review processes.
8. The techniques selected for seeking public input must reflect the purpose for which public input is being sought and be 'fit for purpose'. This may not necessarily require an increase in resourcing; rather, a shift from 'traditional' to new approaches.
9. Those people or groups in society who do not participate because of a lack of resources, knowledge, or political power may need to be assisted to participate (e.g. by provision of information on planning processes, technical advice etc.).
10. To assist DOC staff with applying consistent process to the review of NPMPs, it is recommended that DOC's internal guidance on CMS reviews be updated to also reflect NPMP review processes.

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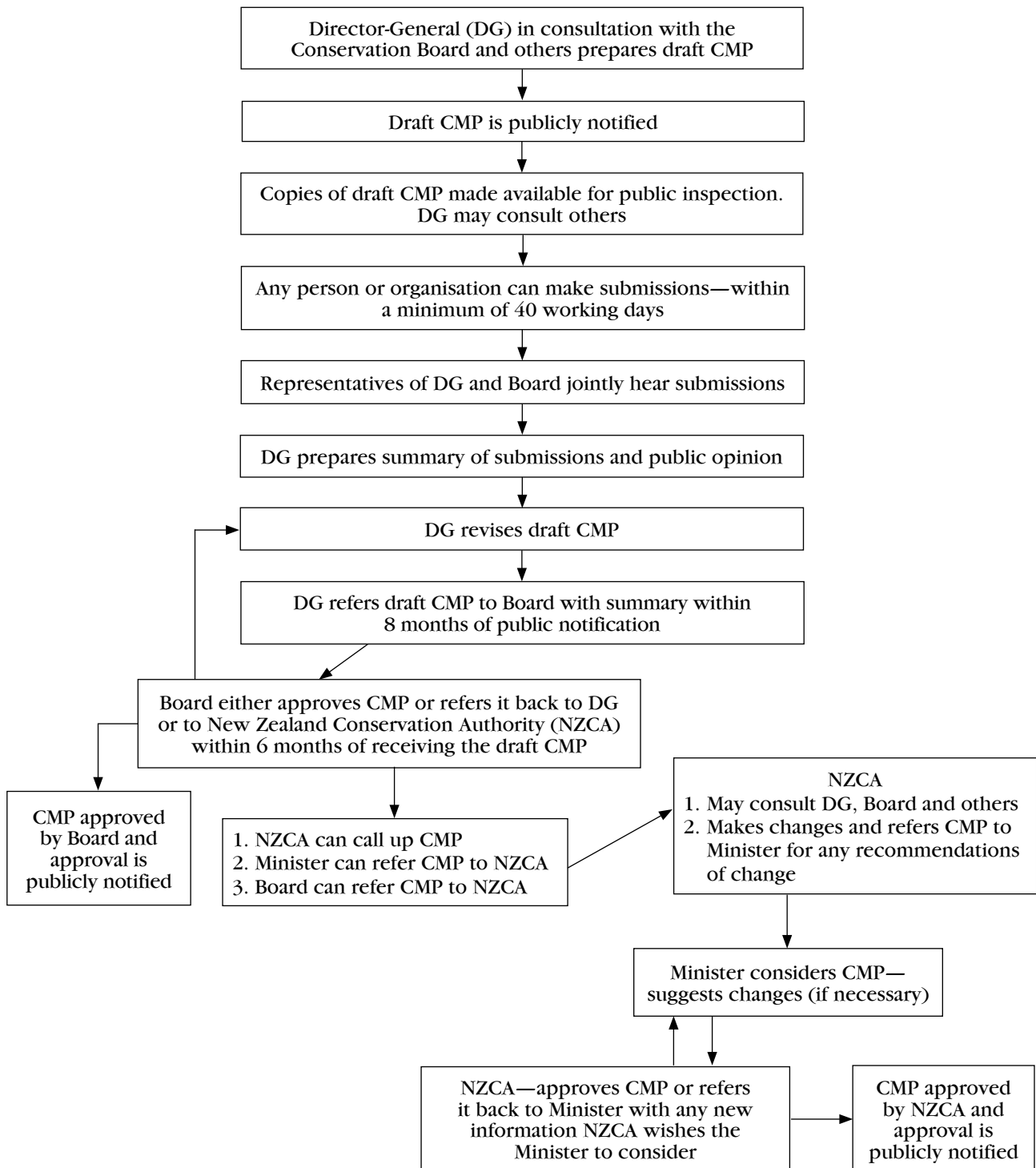
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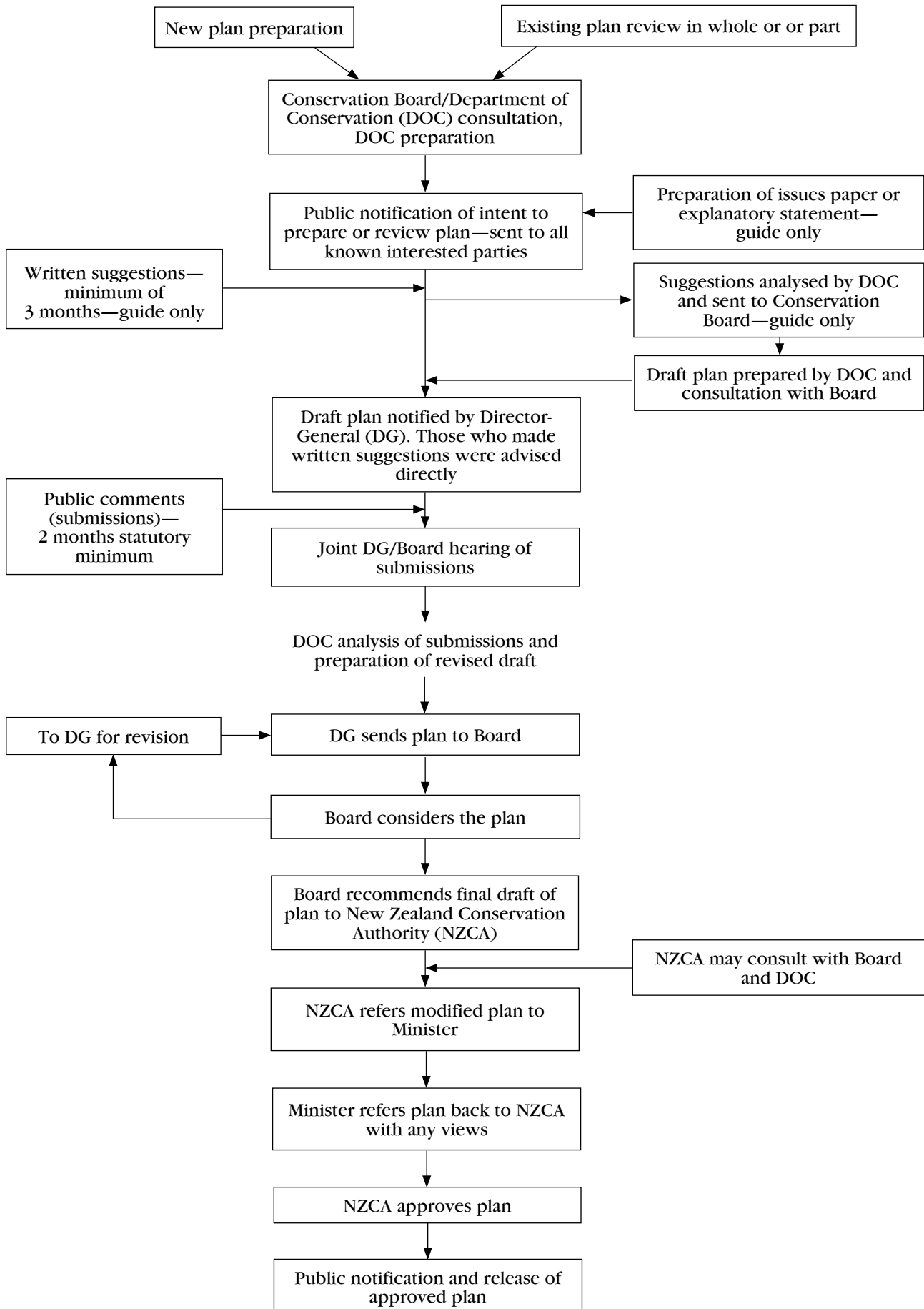
# Appendix 1

## PROCESS FLOWCHARTS FOR THE PREPARATION AND REVIEW OF CONSERVATION MANAGEMENT PLANS (CMPs) AND NATIONAL PARK MANAGEMENT PLANS (NPMPs)

### CMP process flowchart



### NPMP process flowchart





# Appendix 2

## PUBLIC PARTICIPATION PROCESS FOLLOWED IN EACH OF THE NATIONAL PARK MANAGEMENT PLAN (NPMP) CASE-STUDY REVIEWS

NATIONAL PARKS ACT PROCESS	PLAN				
	TONGARIRO NPMP	WHANGANUI NPMP	ABEL TASMAN NPMP	ARTHUR'S PASS NPMP	FIORDLAND NPMP
Public notice of intention to review (section 47(1).)	Intention to review management plan publicly notified on 22 February 2002. Written suggestions for the review invited by 19 April 2002. Plan sent to 290 organisations and individuals. Six public meetings held, as well as meetings with key stakeholders. 23 submissions received.	Intention to review notified in June 2003. Written suggestions invited by end of August 2003. About 1000 information pamphlets circulated outlining purpose of management plan, review process, and number of key issues. 63 suggestions received.	Intention to review notified on 19 March 2005. Information sheet sent to key stakeholders. Written suggestions invited by 18 April 2005. 22 suggestions received.	Intention to review publicly notified in September 2004. Written suggestions invited by 15 November 2004. Posted on DOC website. Wall display and brief presentation during 75th park anniversary. Contacted 320 interested parties directly. 29 comments received.	Intention to review was notified in June 1999. 248 submissions received.
Preparation of draft plan, public notice of draft plan, call of written submissions (section 47(2)).	Draft plan prepared from May 2002 to January 2003. Further consultation with interested parties carried out over this period, including with many who submitted in previous stage (section 47(1)). Draft plan publicly notified in January 2003 and submissions invited by 21 March 2003. Draft plan sent to 170 individuals and organisations. Numerous meetings and hui, including public meetings, held.	Further informal consultation carried out from 2003 to 2006. Draft management plan notified in July 2006. Submissions closed at the end of September 2006. Copies of draft plan were sent to about 150 individuals and organisations. Information pamphlet sent to about 600 individuals and organisations. All information about plan on Internet.	Consulted with key stakeholders: <ul style="list-style-type: none"> <li>• Iwi</li> <li>• Concessionaires</li> <li>• Tourism industry and agencies</li> <li>• Mountain bike interest groups</li> <li>• Abel Tasman Advisory Forum</li> <li>• Local landowners</li> <li>• Conservation Board</li> </ul> Draft plan notified on 28 January 2006. Fact sheet prepared. Copy of plan sent to above stakeholders. Public meetings and meetings with stakeholders held. Submission period closed 5 May 2006.	Draft plan prepared in consultation with Ngāi Tahu (1 hui and informal contact). Plan review progress reports sent to interested parties in July 2005. Draft plan publicly notified in May 2006. 320 interested parties were contacted and provided with submission forms. Public meetings were held from May to June 2006, along with meetings with four potential submitters. Submissions closed 31 July 2006.	A separate working party was created for Milford and produced a series of recommendations. Draft management plan was prepared in consultation with Ngāi Tahu, and publicly notified in November 2002. Hundreds of interested parties were informed. Public meetings and workshops with key stakeholders were held before submissions closed. Submissions closed on 28 February 2003.
Hearing (Section 47(3)).	84 written submissions were received. Each submitter was sent an acknowledgement of their submission. A hearing committee of 3 Conservation Board and 3 DOC staff heard 32 submitters in May 2003.	74 submissions were received. All were sent an acknowledgement letter. Hearings were held in November 2002 for 22 submitters.	277 submissions were received, and 58 submitters were heard during August 2006.	67 written submissions were received. Each submitter was sent an acknowledgement. Hearings were held for 25 submitters in October 2006.	2107 written submissions were received. All submitters were sent an acknowledgement letter and a series of letters about hearings, and update letters. Prior to hearings, each submitter was sent a draft response to their submission and

*Continued on next page*

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NATIONAL PARKS ACT PROCESS	PLAN				
	TONGARIRO NPMP	WHANGANUI NPMP	ABEL TASMAN NPMP	ARTHUR'S PASS NPMP	FIORDLAND NPMP
					revised text. 29 days of hearings were held, and 700 submitters heard. Separate workshops were held for issues on Doubtful Sound and and aircraft matters.
DOC considers submissions and comments, amends plan, forwards plan to Conservation Board (section 47(4)).	Submissions were analysed. DOC's response to each issue was discussed with the Conservation Board in June 2003. Plan was redrafted and presented, along with submissions analysis, to Board in October 2003.	Currently awaiting iwi feedback prior to submitting revised plan to Conservation Board.	Internal DOC meetings and meetings with Board sub-committee were held to discuss submissions and amendments. Draft plan was amended and sent to Board on 28 June 2007.	Submissions analysis was prepared, including DOC's response on each point. Plan was amended and then presented, along with submissions analysis, to the Conservation Board in December 2006. The submission analysis and DOC's responses were sent to each submitter.	Submissions analysis was prepared. Listed by submitter, it is 3549 pages long. DOC's response to each submitter was also provided. This version was also provided on the DOC website.
Conservation Board considers plan (Section 47(5)).	Conservation Board considered the draft plan over a 2-year period. DOC carried out a second legal review of the plan which resulted in changes.		Conservation Board considered the plan. The Board presented the draft plan to tangata whenua on 23 August 2007.	Conservation Board considered the plan from December 2006 to April 2007.	Plan considered over 6 meetings of the Conservation Board, which approved it in June 2006, subject to some minor text changes.
Conservation Board sends the plan to the NZCA, along with a summary of comments received, a statement of the extent to which these are accepted, and points on which DOC and the Board could not agree (section 47(6)).	Conservation Board sent the plan to the NZCA for approval in October 2005. This included submissions analysis, DOC's responses, and a schedule of changes made since the draft plan was presented to the Board in October 2003.		The Conservation Board sent the plan to the NZCA in October 2007.	The Conservation Board sent the revised plan to the NZCA in April 2007.	The Conservation Board recommended the plan to the NZCA on 26 July 2006 <sup>1</sup> .
Approval of management plan (section 48).	The plan was approved by the NZCA in October 2006. The approved plan was made available on the DOC website.			The plan was approved by the NZCA in December 2007. Submitters were sent a letter in January 2007 advising that the plan had been approved. Copies were sent to key stakeholders. The approved plan was made available on the DOC website.	Following comment by the Minister of Conservation and Ngāi Tahu (as appropriate), the plan was approved by NZCA on 21 June 2007. Submitters were sent letters informing them of approved plan. The approved plan was made available on the DOC website.

<sup>1</sup> This included a briefing highlighting aspects not able to be decided at a local level (i.e. customary uses—the briefing resulted in changes to General Policy for National Parks and Conservation General Policy).

# Appendix 3

## COVERING LETTER AND QUESTIONNAIRE

Date

Questionnaire No: DC0982

Name

Address 1

Address 2



### SURVEY OF PUBLIC PARTICIPATION IN DEPARTMENT OF CONSERVATION MANAGEMENT PLAN REVIEWS

**Your opinion is important!**

Dear Name

**Your opinion is important to DOC**

The Department of Conservation is undertaking an evaluation that will help improve the way that they involve the public in their statutory planning processes. As part of this, they have asked us to get feedback from a cross-section of people and organisations that have made a submission on the recent review of the Whanganui National Park management plan. This is your opportunity to share your experiences with the Department and tell them how you think public involvement in the review process could be improved or changed; or inform the Department about what works well.

The attached survey asks about your involvement in the public consultation, submissions and hearings processes relating to the Whanganui National Park management plan review. The survey is also being sent to people that made submissions on other recent management plan reviews. While many of the processes for public participation in each stage of a management plan review are the result of statutory requirements, there is some variation in how these processes are implemented. In addition, many of the reviews use additional methods for public involvement, such as holding informal public and interest group meetings at various stages in the review. This survey asks about processes that are common across a number of management plan reviews but, because of this variation, there may be some questions that are not relevant to the review process that you were involved in.

We are aware that some of the management plan reviews are not yet complete and you may not, therefore, have received feedback on your submission from the Department. Nevertheless, we would be grateful if you could answer all relevant questions based on your experiences of the process *to date*.

If you prepared a submission on the Whanganui National Park management plan as a representative or member of an organisation, please answer the questions based on the organisation's views as well as you can, and feel free to include the opinions of others in the organisation.

Research New Zealand works in accordance with the Code of Practice of the Market Research Society of New Zealand (MRSNZ) and the Privacy Act 1993. Your identity and your answers to the survey questions will be kept strictly confidential, and survey findings will only be presented in grouped form. Participation in the survey is purely voluntary, however your involvement would be greatly appreciated.

To complete the survey online, please go to <https://surveys.researchnz.com/PN3636/> and enter your unique user name and password as below:

**Username:**

**Password:**

Alternatively, you can complete the survey attached and return in the freepost envelope provided.

If you have any questions, please call Liam Hickey at Research New Zealand on 0800 500 168 (email [liam.hickey@researchnz.com](mailto:liam.hickey@researchnz.com) and Wellington residents can call 4626441). Alternatively, the project manager at the Department of Conservation is Ned Hardie-Boys (email [nhardie-boys@doc.govt.nz](mailto:nhardie-boys@doc.govt.nz) or call 04 471 3205).

Thank you very much for your help.

Yours sincerely,



Liam Hickey  
Researcher

RNZ Ref: DC0982

## This Survey

The survey is structured in six parts:

- Section One asks some general questions about your involvement in the management plan review process
- Section Two focuses on involvement in the early consultative stages of the process, **prior to the release of a draft management plan**
- Section Three asks about your experiences in responding to an actual draft management plan during the formal submissions period, **through written submission, attending a hearing or other ways**
- Section Four asks about your experiences **following the submission period**
- Section five asks three questions about your views on the overall process
- Section six asks some questions about you

The questions relate to the review of the **Whanganui National Park** management plan carried out recently. Please do not refer to any other management plan.

**Questionnaire No:**

<b>SECTION ONE: ABOUT YOUR INVOLVEMENT</b>
--------------------------------------------

- 1 **How did you find out that the Department of Conservation (DOC) was going to review the Whanganui National Park management plan?**

		<b>Please tick all boxes that apply.</b>
a.	Saw a public notice in the newspaper.....	<input type="checkbox"/> 1
b.	Read an article/story in the newspaper.....	<input type="checkbox"/> 2
c.	Heard a public notice or a media statement on the radio.....	<input type="checkbox"/> 3
d.	Received a letter or a copy of the public notice direct from DOC.....	<input type="checkbox"/> 4
e.	Saw a notice on the DOC website.....	<input type="checkbox"/> 5
f.	Saw a notice in a DOC office or visitor centre.....	<input type="checkbox"/> 6
g.	Through direct contact with DOC staff.....	<input type="checkbox"/> 7
h.	Through involvement in a group or club.....	<input type="checkbox"/> 8
i.	Through family, friends or neighbours.....	<input type="checkbox"/> 9
j.	Other (please specify) _____ _____	<input type="checkbox"/> 10

- 2 **Why did you feel it was important to get involved in the review of the Whanganui National Park management plan?**

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**3 Please indicate the way(s) you were involved in the Whanganui National Park management plan review process.**

		<b>Please tick all boxes that apply.</b>
a.	I made written suggestions on what should be included in the draft plan or written comments in response to a discussion paper .....	<input type="checkbox"/> <sub>1</sub>
b.	I was approached for advice or views on specific issues .....	<input type="checkbox"/> <sub>2</sub>
c.	I attended a public meeting or an interest group meeting to discuss suggestions on what should be included in the draft plan or in response to a discussion paper .....	<input type="checkbox"/> <sub>3</sub>
d.	I attended a public meeting or an interest group meeting to discuss proposals contained in the actual draft management plan .....	<input type="checkbox"/> <sub>4</sub>
e.	I prepared a written submission on the draft management plan .....	<input type="checkbox"/> <sub>5</sub>
f.	I was contacted to clarify some aspects of my submission .....	<input type="checkbox"/> <sub>6</sub>
g.	I attended a formal hearing to present an oral submission on the draft management plan.....	<input type="checkbox"/> <sub>7</sub>
h.	Other (please specify): _____ _____	<input type="checkbox"/> <sub>8</sub>

**4 Did you want the opportunity to be involved or contribute to the review process in any other way? If so, what was this?**

		<b>Please tick all boxes that apply.</b>
a.	I would have liked to make written suggestions on what should be included in the draft plan or to have made comments in response to a discussion paper	<input type="checkbox"/> <sub>1</sub>
b.	I would have liked to attend a public meeting or an interest group meeting to discuss suggestions on what should be included in the draft plan or in response to a discussion paper .....	<input type="checkbox"/> <sub>2</sub>
c.	I would have liked to attend a public meeting or an interest group meeting to discuss proposals contained in the actual draft management plan.....	<input type="checkbox"/> <sub>3</sub>
d.	I would have liked to attend a formal hearing to present an oral submission on the draft management plan.....	<input type="checkbox"/> <sub>4</sub>
e.	Other (please specify): _____ _____	<input type="checkbox"/> <sub>5</sub>

**SECTION TWO: YOUR PARTICIPATION IN THE INITIAL STAGES**

**5 Did you receive an initial discussion document or information outlining the key issues for the draft management plan?**

Yes .....  **1 (Go to Question 6)**  
 No .....  **2 (Go to Question 8)**

**6 What information did you receive?**

		<b>Please tick all boxes that apply.</b>
a.	A discussion document .....	<input type="checkbox"/> <b>1</b>
b.	A letter, pamphlet or an information pack outlining the review process.....	<input type="checkbox"/> <b>2</b>
c.	A letter, pamphlet or an information pack outlining key management planning issues covered in the review .....	<input type="checkbox"/> <b>3</b>
d.	A copy of the existing approved management plan for the area .....	<input type="checkbox"/> <b>4</b>
e.	A copy of particular sections of the new plan as it was being drafted .....	<input type="checkbox"/> <b>5</b>
f.	Other (please specify): _____	<input type="checkbox"/> <b>6</b>
	_____	

**7a How helpful was this initial information in helping you to understand the review in each of the following areas:**

**The review process**

<b>Please tick one box.</b>					
<input type="checkbox"/> <b>1</b>	<input type="checkbox"/> <b>2</b>	<input type="checkbox"/> <b>3</b>	<input type="checkbox"/> <b>4</b>	<input type="checkbox"/> <b>5</b>	<input type="checkbox"/> <b>6</b>
Not very helpful		Somewhat helpful		Very helpful	Don't Know/Cant remember

**7b The issues to be covered in the review (or the content of the review):**

<b>Please tick one box.</b>					
<input type="checkbox"/> <b>1</b>	<input type="checkbox"/> <b>2</b>	<input type="checkbox"/> <b>3</b>	<input type="checkbox"/> <b>4</b>	<input type="checkbox"/> <b>5</b>	<input type="checkbox"/> <b>6</b>
Not very helpful		Somewhat helpful		Very helpful	Don't Know/Cant remember

**Please explain your response:**

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8 Did you provide any written or oral feedback or suggestions to DOC in this initial stage of the review?

Yes.....  1 (Go to Question 9)

No .....  2 (Go to Question 10)

9 What sources of information did you use in putting together your feedback?

		Please tick all boxes that apply.
a.	Discussion paper .....	<input type="checkbox"/> 1
b.	Newspaper.....	<input type="checkbox"/> 2
c.	Radio .....	<input type="checkbox"/> 3
d.	Television.....	<input type="checkbox"/> 4
e.	Internet.....	<input type="checkbox"/> 5
f.	Group meeting with DOC staff .....	<input type="checkbox"/> 6
g.	Group meeting without DOC staff .....	<input type="checkbox"/> 7
h.	Public meeting with DOC staff .....	<input type="checkbox"/> 8
i.	Individual meeting or contact with DOC staff .....	<input type="checkbox"/> 9
j.	Personal experience / knowledge of the area .....	<input type="checkbox"/> 10
k.	Other (please specify): _____	<input type="checkbox"/> 11
	_____	

10 Did you attend any public or interest group meetings during this initial stage of the review?

Yes.....  1 (Go to Question 10a)

No .....  2 (Go to Question 10b)

10a If yes, how helpful did you find the meetings to understand the issues covered in the review?

Please tick one box.					
<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Not very helpful		Somewhat helpful		Very helpful	Don't Know/Cant remember

10b If no, why did you not attend?

		Please tick all boxes that apply.
a.	Meeting not available .....	<input type="checkbox"/> 1
b.	Wasn't that interested .....	<input type="checkbox"/> 2
c.	Time/date prevented me .....	<input type="checkbox"/> 3
d.	Location prevented me .....	<input type="checkbox"/> 4
e.	Didn't think it would be helpful .....	<input type="checkbox"/> 5
f.	Didn't know about any meetings .....	<input type="checkbox"/> 6
g.	Other (please specify): _____	<input type="checkbox"/> 7
	_____	



11 What, if anything, might be improved about any information that you received, and the meetings or any other opportunities to provide suggestions and feedback in this initial stage of the management plan review?

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**SECTION THREE: YOUR SUBMISSION(S) ON THE DRAFT MANAGEMENT PLAN**

12 Did you attend any public or interest group meetings with DOC after the draft management plan had been publicly released?

Yes..... <sub>1</sub> (Go to Question 12a)  
 No ..... <sub>2</sub> (Go to Question 12b)

12a If yes, how helpful did you find the meetings to understand the issues covered in the draft management plan?

Please tick <u>one</u> box.					
<input type="checkbox"/> <sub>1</sub>	<input type="checkbox"/> <sub>2</sub>	<input type="checkbox"/> <sub>3</sub>	<input type="checkbox"/> <sub>4</sub>	<input type="checkbox"/> <sub>5</sub>	<input type="checkbox"/> <sub>6</sub>
Not very helpful		Somewhat helpful		Very helpful	Don't Know/Cant remember

If you have any additional comments about the meetings, please write them here:

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12b If no, why did you not attend?

		Please tick all boxes that apply.
a.	Meeting not available .....	<input type="checkbox"/> <sub>1</sub>
b.	Wasn't that interested .....	<input type="checkbox"/> <sub>2</sub>
c.	Time/date prevented me .....	<input type="checkbox"/> <sub>3</sub>
d.	Location prevented me .....	<input type="checkbox"/> <sub>4</sub>
e.	Felt that the draft plan covered all issues well and it was not necessary to attend .....	<input type="checkbox"/> <sub>5</sub>
f.	Didn't think it would be helpful .....	<input type="checkbox"/> <sub>6</sub>
g.	Didn't know about any meetings .....	<input type="checkbox"/> <sub>7</sub>
h.	Other (please specify): _____ _____ _____	<input type="checkbox"/> <sub>8</sub>

**13 What sources of information did you use in putting together your written submission on the draft management plan?**

		Please tick all boxes that apply.
a.	Existing approved management plan .....	<input type="checkbox"/> 1
b.	The draft management plan .....	<input type="checkbox"/> 2
c.	Newspaper .....	<input type="checkbox"/> 3
d.	Radio .....	<input type="checkbox"/> 4
e.	Television .....	<input type="checkbox"/> 5
f.	Internet .....	<input type="checkbox"/> 6
g.	Group meeting with DOC staff .....	<input type="checkbox"/> 7
h.	Group meeting without DOC staff .....	<input type="checkbox"/> 8
i.	Public meeting with DOC staff .....	<input type="checkbox"/> 9
j.	Individual meeting or contact with DOC staff .....	<input type="checkbox"/> 10
k.	Personal experience / knowledge of the area .....	<input type="checkbox"/> 11
l.	Other (please specify): _____	<input type="checkbox"/> 12
	_____	

**14 Do you think that the draft management plan alone provided enough information for you to make your submission?**

- Yes .....  1 (Go to Question 15)
- No .....  2 (Go to Question 14a)
- Don't know .....  3 (Go to Question 14a)

**14a If no or don't know, please describe what other information you would have liked:**

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**15 Please rate the information that was provided in the draft management plan for the following:**

**Coverage of the key issues**

Please tick one box.					
<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Inadequate /neglected key issues		Neutral		Adequate/ covered key issues	Don't Know/Cant remember

**Easy to Understand**

Please tick one box.					
<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Very difficult to understand		Neutral		Very easy to understand	Don't Know/Cant remember

**Balance of perspectives**

Please tick <u>one</u> box.				
<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Unbalanced /biased		Neutral		Balanced/ unbiased

<input type="checkbox"/> 6
Don't Know/Cant remember

**16 Was making a written submission the preferred way for you to participate in the Whanganui National Park management plan review, compared to some other way?**

- Yes .....  1  
 No .....  2

**Please explain why, or why not:**

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**17 What, if anything, might have improved your participation in the process of providing a written submission?**

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**18 Did you attend a hearing to speak in support of your written submission on the Whanganui National Park draft management plan?**

- Yes .....  1 (Go to Question 20)  
 No .....  2 (Go to Question 19)  
 Someone else spoke in support of my/our submission .....  3 (Go to Question 21)

**19 If you did not ask to be heard, what were your reasons?**

		<b>Please tick all boxes that apply.</b>
a.	I had work obligations .....	<input type="checkbox"/> 1
b.	The date/time of day prevented me .....	<input type="checkbox"/> 2
c.	The location was not accessible .....	<input type="checkbox"/> 3
d.	I felt the written submission was enough .....	<input type="checkbox"/> 4
e.	My submission was in support of the draft management plan and I did not feel it was necessary to speak to this .....	<input type="checkbox"/> 5
f.	My interests were being represented by someone else .....	<input type="checkbox"/> 6
g.	I don't like hearings .....	<input type="checkbox"/> 7
h.	Other (please specify): _____	<input type="checkbox"/> 8

Go to Question 21

20 Please rate how difficult you found speaking in support of your submission at the hearing:

Please tick one box.					
<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Found it very difficult		Neutral		Found it very easy	Don't Know/Cant remember

21 Please indicate below any improvements you think would have helped you or others to participate in the formal hearing process:

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**SECTION FOUR: FOLLOW-UP TO THE SUBMISSIONS PROCESS**

**We understand that not all of the management plan review processes included in this survey have reached a stage of providing feedback to submitters, and in the case of at least two reviews – Whanganui National Park and Kaimanawa Forest Park – this feedback is imminent. Nevertheless, we would still like everyone to complete all**

22 Have you received any written feedback about your submission on the Whanganui National Park management plan review?

Yes.....  1 (Go to Question 22a)  
 No .....  2 (Go to Question 22b)

22a How useful was this feedback

Please tick one box.					
<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Not very useful		Neutral		Very useful	Don't Know/Cant remember

If you have any additional comments about the feedback, please write them here:

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**22b If you did not get feedback, do you think it would have been useful to get feedback about your submission?**

- Yes.....  1  
 No .....  2  
 Don't know .....  3

**23 How well do you think the management plan review took all points of view into account?**

Please tick <u>one</u> box.					
<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6
Did not take views into account at all		Neutral		Fully took account of all views	Don't Know/Cant remember

**If you have any additional comments about how well views were taken into account, please write them here:**

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**SECTION FIVE: OVERALL VIEWS ON THE OPPORTUNITIES FOR PUBLIC INVOLVEMENT IN THE REVIEW PROCESS**

**24 What were the key strengths of the processes for public participation in the Whanganui National Park management plan review?**

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**25 What were the key weaknesses of the processes for public participation in the Whanganui National Park management plan review?**

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26 Please provide additional comments here on how the Department of Conservation's public participation processes for management plan reviews could be improved.

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**ABOUT YOU**

To help us analyse our data, we have a few more questions about you.

27 Did you prepare your submission on the Whanganui National Park draft management plan as an individual or as a representative or member of an organisation? (Tick only one.)

- Individual.....  1 (Go to Question 28)
- Organisation.....  2 (Go to Question 29)
- Other.....  3 (Go to Question 29)

28 Do you participate in or are you a member of any outdoor recreation, conservation or environmental groups?

- No.....  1
- Yes, please give the name(s): \_\_\_\_\_  2

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**Go to question 30**

29 Please indicate the type of organisation you prepared a submission on the Whanganui National Park draft management plan for: (Tick only one.)

- Conservation or environmental group.....  1
- Outdoor recreational group.....  2
- Concessionaire.....  3
- Business.....  4
- Maori/Iwi/Hapu group.....  5
- Local/regional government.....  6
- Central government.....  7
- Other, please specify: \_\_\_\_\_  8

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31 Are you.....? (Tick only one.)

- Female.....  1
- Male.....  2

**32 Which ethnic group(s) do you belong to? (Tick as many as apply.)**

- European/New Zealand European/Pakeha .....  1
- Māori .....  2
- Pacific Islander .....  3
- Asian (incl Indian).....  4
- New Zealand/Kiwi .....  5
- Other ethnic group, please specify: \_\_\_\_\_  6
- Refused .....  7

**33 And which of the following best describes your highest qualification? (Tick only one.)**

- No qualification.....  1
- School qualification .....  2
- Certificate or Diploma.....  3
- Polytechnic/University courses below Bachelors degree .....  4
- Bachelor degree.....  5
- Post-graduate degree (Honours, Masters, PhD) .....  6
- Other .....  7
- Don't know.....  8
- Refused.....  9

**34 At present, are you.....? (Tick as many as apply.)**

- Self employed/business owner .....  1
- Full-time salary or wage earner .....  2
- Part-time salary or wage earner (less than 30 hours per week).....  2
- Retired .....  3
- Full-time home-maker .....  4
- Student .....  5
- Unemployed .....  6
- Other beneficiary.....  7
- Other, please specify: \_\_\_\_\_  8
- Refused .....  9

**35 What is your individual income for last year, before tax?**

- Nil income or loss.....  1
- Under \$20,000 .....  2
- \$-20,000 - \$30,000.....  3
- \$-30,000 - \$50,000.....  4
- \$-50,000 - \$70,000.....  5
- \$-70,000 - \$100,000.....  6
- \$100,000 and over .....  7
- Don't know.....  8
- Refused .....  9

**36 In which of the following areas of New Zealand do you live? (Tick only one.)**

- Northland .....  1
- Auckland .....  2
- Waikato.....  3
- Bay of Plenty .....  4
- Gisborne .....  5
- Hawke's Bay.....  6
- Taranaki.....  7
- Manawatu-Wanganui.....  8
- Wellington-Wairarapa .....  9
- Tasman.....  10
- Nelson .....  11
- Marlborough .....  12
- West Coast.....  13
- Canterbury .....  14
- Otago.....  15
- Southland.....  16
- Other, please specify: \_\_\_\_\_  17

**37 Have you made submissions on any management plans or strategies for any other protected areas, besides Whanganui National Park, or submissions on consent applications or proposed plans and policies under the Resource Management Act or Local Government Act? If so, what were these? (Select all the apply)**

- A conservation management strategy for an area .....  1
- A conservation management plan for a specific site (e.g. a forest park or reserve).....  2
- A national park management plan.....  3
- A marine reserve management plan.....  4
- A resource consent process .....  5
- A proposed regional or district plan .....  6
- A designation process for an area of land .....  7
- A long-term council community plan.....  7
- Other, please specify: \_\_\_\_\_  8

**THANK YOU VERY MUCH**

**If you have any further comments you would like to add about public participation in management plan reviews please write below:**

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**Please place your completed questionnaire in the self-seal envelope provided or you can return it free of charge directly to:  
 Freepost 2088 Wn, Research New Zealand, PO Box 10-617, Wellington.**



# Appendix 4

## INTERVIEW SCHEDULE

# Evaluation of public involvement in management plan reviews:

## Interview form

### Introduction

- Introduce self and involvement as a researcher, rather than as an expert in DOC's management planning processes.
- Outline purpose of evaluation, methods (survey and stakeholder interviews) and focus on process compared to content.
- Summarise key strengths, weaknesses and improvements to the process suggested by respondents to survey.
- Outline protocol for interview, how the information will be used and confidentiality (intend listing people we spoke to but not attributing specific comments to individuals), get their consent.
- Any issues re audio recording the interview?
- Discussion covers six main areas – hand over sheet with my contact details.

### 1. Purpose of public involvement

#### Staff and Board

- Why does DOC review management plans every 10 years, what is it trying to achieve?
- What is DOC hoping to achieve by involving the public in the review process? (i.e. what is the purpose of public involvement?)
- Do you think people in DOC share a common understanding about what they hope public involvement will add to the process?

#### Public

- What do you think DOC is trying to achieve through reviewing the [WNP] management plan every ten years?
- What do you think DOC is hoping to achieve by involving the public in the review process? (i.e. what is the purpose of public involvement?)
- What were you hoping to achieve by getting involved in the review?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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## 2. Scope of reviews and level of involvement

### Staff and Board

- Do you think people are clear about what is included in the scope of the review, and what is not? (e.g. do people understand what is covered by a management plan as opposed to CMS and general policies?)
- Do you think the scope of the [WNP] management plan review was about right? (i.e. should it be focused solely on policy direction or operational matters too?)
- What are the key attributes of an effective submission? (also, how useful do you think form-submissions are?)

### Public

- Were you or are you clear about what is included in the scope of the review, and what is not? (e.g. do people understand what is covered by a management plan as opposed to CMS and general policies?)
- Do you think the scope of the [WNP] management plan review was about right? (i.e. should it be focused solely on policy direction or operational matters too?)
- What are the key attributes of an effective submission? (also, how useful do you think form-submissions are?)
- Were you clear about DOC's expectations in terms of the level of feedback they were expecting?
- Did you respond on policies and proposals in the draft plan that you supported, as well as those that you objected to, and why/why not?

## 3. Methods for public involvement

### Staff and Board

- What ways of public engagement worked really well, and why?
- What ways did not work very well, and why not?
- What lessons are there for DOC from public involvement in other planning, policy or consent processes?
- How could DOC improve its processes?

### Public

- What ways of public engagement worked really well, and why?
- What ways did not work very well, and why not?
- Are there other ways you would have liked to have been involved, and how?
- What lessons are there for DOC from public involvement in other planning, policy or consent processes?
- How could DOC improve its processes?

#### 4. Results

##### Staff and Board

- What does public involvement add to the process / what difference does it make?
- Through the methods used for public involvement, do you think it achieves what is intended? (i.e. see *Purpose*)
- What additional benefits does it bring? (e.g. public awareness and relations)

##### Public

- What do you think public involvement add to the process / what difference does it make?
- Through the methods used for public involvement, do you think it achieves what is intended? (i.e. see *Purpose*)
- What additional benefits does it bring? (e.g. public awareness and relations)
- Has your involvement in the process encouraged or discouraged you from getting involved in other processes or activities that DOC does or coordinates?

#### 5. Resources and capacity

##### Staff and Board

- Does the public involvement process require significant resourcing to deliver?
- Is this level of investment appropriate, worthwhile, and is it sustainable?
- Do you think people and organisations have sufficient capacity to effectively engage in the process?
- Do you think DOC had/has sufficient capacity to effectively engage with the public in the process?
- Did DOC make any resources available to support public involvement, and/or should it? (e.g. best practice guidelines or the NZCA booklet)
- How can the process be made more efficient? (e.g. especially thinking about the duration of the reviews)

##### Public

- Do you find that it required a significant amount of time or other resources to fully engage with the review?
- Was this investment warranted / worthwhile, and is it sustainable?
- Did you have sufficient capacity to effectively engage in the process?
- Do you think DOC had/has sufficient capacity to effectively engage with the public in the process?
- Are there any particular tools or resources that DOC could provide that would make your involvement easier?
- How can the process be made more efficient? (e.g. especially thinking about the duration of the reviews)

## 6. Representation

### Staff and Board

- Do you feel the breadth of public representation in the review process is adequate or appropriate? What more could be done?
- What would more usefully contribute to the review and the purposes of public involvement in the review: a greater level of involvement from a smaller number of stakeholders or some involvement from a far wider representation of people / groups – i.e. the general public? (or is this trade-off not appropriate)
- There is a perception that the process favours particular views and interests over others, and, therefore, treats groups unequally. Do you have any comments on this?

### Public

- Do you feel the breadth of public representation in the review process is adequate or appropriate? What more could be done?
- What would more usefully contribute to the review and the purposes of public involvement in the review: a greater level of involvement from a smaller number of stakeholders or some involvement from a far wider representation of people / groups – i.e. the general public? (or is this trade-off not appropriate)
- There is a perception that the process favours particular views and interests over others, and, therefore, treats groups unequally. Do you have any comments on this?

# Appendix 5

## DATA TABLES

TABLE A5.1. Q1—HOW DID YOU FIND OUT THAT THE DEPARTMENT OF CONSERVATION (DOC) WAS GOING TO REVIEW THE [PARK] MANAGEMENT PLAN?

	PROPORTION OF RESPONDENTS* (%)
Saw a public notice in the newspaper	25
Read an article/story in the newspaper	18
Heard a public notice or a media statement on the radio	5
Received a letter or a copy of the public notice direct from DOC	28
Saw a notice on the DOC website	5
Saw a notice in a DOC office or visitor centre	4
Through direct contact with DOC staff	16
Through involvement in a group or club	43
Through family, friends, or neighbours	19
Other	10

\*  $n = 231$ .

Note: totals may exceed 100% because of multiple responses.

TABLE A5.2. Q3—PLEASE INDICATE THE WAYS YOU WERE INVOLVED IN THE [PARK] MANAGEMENT PLAN REVIEW PROCESS.

	PROPORTION OF RESPONDENTS* (%)
I made written suggestions on what should be included in the draft plan or written comments in response to a discussion paper	48
I was approached for advice or views on specific issues	7
I attended a public meeting or an interest group meeting to discuss suggestions on what should be included in the draft plan or in response to a discussion paper	14
I attended a public meeting or an interest group meeting to discuss proposals contained in the actual draft management plan	19
I prepared a written submission on the draft management plan	74
I was contacted to clarify some aspects of my submission	4
I attended a formal hearing to present an oral submission on the draft management plan	25
Other	10

\*  $n = 231$ .

Note: totals may exceed 100% because of multiple responses.

TABLE A5.3. Q4—DID YOU WANT THE OPPORTUNITY TO BE INVOLVED OR CONTRIBUTE TO THE REVIEW PROCESS IN ANY OTHER WAY? IF SO, WHAT WAS THIS?

	PROPORTION OF RESPONDENTS* (%)
I would have liked to make written suggestions on what should be included in the draft plan or to have made comments in response to a discussion paper	14
I would have liked to attend a public meeting or an interest group meeting to discuss suggestions on what should be included in the draft plan or in response to a discussion paper	14
I would have liked to attend a public meeting or an interest group meeting to discuss proposals contained in the actual draft management plan	16
I would have liked to attend a formal hearing to present an oral submission on the draft management plan	10
Other	8
No	48

\*  $n = 231$ .

Note: totals may exceed 100% because of multiple responses.

TABLE A5.4. Q5—DID YOU RECEIVE AN INITIAL DISCUSSION DOCUMENT OR INFORMATION OUTLINING THE KEY ISSUES FOR THE DRAFT MANAGEMENT PLAN?

	PROPORTION OF RESPONDENTS* (%)
Yes	65
No	35
Total	100

\*  $n = 231$ .

TABLE A5.5. Q6—WHAT INFORMATION DID YOU RECEIVE?

	PROPORTION OF RESPONDENTS* (%)
A discussion document	45
A letter, a pamphlet, or an information pack outlining the review process	25
A letter, a pamphlet, or an information pack outlining key management planning issues covered in the review	23
A copy of the existing approved management plan for the area	16
A copy of particular sections of the new plan as it was being drafted	20
Other	9
Don't know	5

\*  $n = 231$ .

Note: totals may exceed 100% because of multiple responses.

TABLE A5.6. Q7A—HOW HELPFUL WAS THIS INITIAL INFORMATION IN HELPING YOU TO UNDERSTAND THE REVIEW PROCESS?

	PROPORTION OF RESPONDENTS* (%)
Not very helpful	5
	6
Somewhat helpful	25
	20
Very helpful	31
Don't know / can't remember	11
No response	3
Total	100

\*  $n = 151$ —subsample based on those who received initial information.

TABLE A5.7. Q7B—HOW HELPFUL WAS THIS INITIAL INFORMATION IN HELPING YOU TO UNDERSTAND THE ISSUES COVERED IN THE REVIEW?

	PROPORTION OF RESPONDENTS* (%)
Not very helpful	7
	8
Somewhat helpful	23
	25
Very helpful	20
Don't know / can't remember	15
No response	3
Total	100

\*  $n = 151$ —subsample based on those who received initial information.

TABLE A5.8. Q8—DID YOU PROVIDE ANY WRITTEN OR ORAL FEEDBACK OR SUGGESTIONS TO DOC IN THIS INITIAL STAGE OF THE REVIEW?

	PROPORTION OF RESPONDENTS* (%)
Yes	48
No	52
Total	100

\*  $n = 231$ .



TABLE A5.9. Q9—WHAT SOURCES OF INFORMATION DID YOU USE IN PUTTING TOGETHER YOUR FEEDBACK?

	PROPORTION OF RESPONDENTS* (%)
Discussion paper	41
Newspaper	10
Radio	4
Television	3
Internet	5
Group meeting with DOC staff	16
Group meeting without DOC staff	12
Public meeting with DOC staff	16
Individual meeting or contact with DOC staff	22
Personal experience / knowledge of the area	71
Other	23

\*  $n = 111$ —subsample based on those who provided feedback at the initial stage of the review.  
 Note: totals may exceed 100% because of multiple responses.

TABLE 5.10. Q10—DID YOU ATTEND ANY PUBLIC OR INTEREST GROUP MEETINGS DURING THIS INITIAL STAGE OF THE REVIEW?

	PROPORTION OF RESPONDENTS (%)
Yes	24
No	76
Total	100

TABLE A5.11. Q10A—IF YES, HOW HELPFUL DID YOU FIND THE MEETINGS TO UNDERSTAND THE ISSUES COVERED IN THE REVIEW?

	PROPORTION OF RESPONDENTS* (%)
Not very helpful	16
	4
Somewhat helpful	33
	22
Very helpful	20
Don't know / can't remember	5
Total	100

\*  $n = 55$ —subsample based on those who attended meetings during the initial stage of the review.

TABLE A.5.12. Q10B—IF NO, WHY DID YOU NOT ATTEND?

	PROPORTION OF RESPONDENTS* (%)
Meeting not available	13
Wasn't that interested	3
Time/date prevented me	22
Location prevented me	30
Didn't think it would be helpful	11
Didn't know about any meetings	27
Other	16

\*  $n = 176$ —subsample based on those who did not attend meetings during the initial stage of the review.

Note: totals may exceed 100% because of multiple responses.

TABLE A5.13. Q12—DID YOU ATTEND ANY PUBLIC OR INTEREST GROUP MEETINGS WITH DOC AFTER THE DRAFT MANAGEMENT PLAN HAD BEEN PUBLICLY RELEASED?

	PROPORTION OF RESPONDENTS* (%)
Yes	22
No	78
Total	100

\*  $n = 231$ .

TABLE A5.14. Q12A—IF YES, HOW HELPFUL DID YOU FIND THE MEETINGS TO UNDERSTAND THE ISSUES COVERED IN THE DRAFT MANAGEMENT PLAN?

	PROPORTION OF RESPONDENTS* (%)
Not very helpful	16
	4
Somewhat helpful	27
	22
Ver helpful	25
Don't know / can't remember	6
Total	100

\*  $n = 51$ —subsample based on those who attended meetings after the plan had been released.

TABLE A5.15. Q12B—IF NO, WHY DID YOU NOT ATTEND?

	PROPORTION OF RESPONDENTS* (%)
Meeting not available	9
Wasn't that interested	5
Time/date prevented me	28
Location prevented me	32
Felt that the draft plan covered all issues well and it was not necessary to attend	13
Didn't think it would be helpful	11
Didn't know about any meetings	24
Other	18

\*  $n = 180$ —subsample based on those who did not attend meetings after the plan had been released.

Note: totals may exceed 100% because of multiple responses.

TABLE A5.16. Q13—WHAT SOURCES OF INFORMATION DID YOU USE IN PUTTING TOGETHER YOUR WRITTEN SUBMISSION ON THE DRAFT MANAGEMENT PLAN?

	PROPORTION OF RESPONDENTS* (%)
Existing approved management plan	20
The draft management plan	58
Newspaper	6
Radio	1
Television	2
Internet	6
Group meeting with DOC staff	10
Group meeting without DOC staff	9
Public meeting with DOC staff	6
Individual meeting or contact with DOC staff	14
Personal experience / knowledge of the area	72
Other	27

\*  $n = 231$ .

Note: totals may exceed 100% because of multiple responses.

TABLE A5.17. Q14—DO YOU THINK THAT THE DRAFT MANAGEMENT PLAN ALONE PROVIDED ENOUGH INFORMATION FOR YOU TO MAKE YOUR SUBMISSION?

	PROPORTION OF RESPONDENTS* (%)
Yes	65
No	24
Don't know	11
Total	100

\*  $n = 231$ .

TABLE A5.18. Q15A—PLEASE RATE THE INFORMATION THAT WAS PROVIDED IN THE DRAFT MANAGEMENT PLAN FOR THE COVERAGE OF THE KEY ISSUES?

	PROPORTION OF RESPONDENTS* (%)
Inadequate / neglected key issues	7
	8
Neutral	19
	24
Adequate / covered all key issues	28
Don't know / can't remember	11
No response	3
Total	100

\*  $n = 231$ .

TABLE A5.19. Q15B—PLEASE RATE THE INFORMATION THAT WAS PROVIDED IN THE DRAFT MANAGEMENT PLAN FOR HOW EASY IT WAS TO UNDERSTAND?

	PROPORTION OF RESPONDENTS* (%)
Very difficult to understand	5
	7
Neutral	26
	28
Very easy to understand	20
Don't know / can't remember	10
No response	3
Total	100

\*  $n = 231$ .

TABLE A5.20. Q15C—PLEASE RATE THE INFORMATION THAT WAS PROVIDED IN THE DRAFT MANAGEMENT PLAN FOR HOW BALANCED IT WAS?

	PROPORTION OF RESPONDENTS* (%)
Unbalanced/biased	14
	17
Neutral	26
	12
Balanced/unbiased	11
Don't know / can't remember	16
No response	3
Total	100

\*  $n = 231$ .

TABLE A5.21. Q16—WAS MAKING A WRITTEN SUBMISSION THE PREFERRED WAY FOR YOU TO PARTICIPATE IN THE [PARK] PLAN REVIEW, COMPARED TO SOME OTHER WAY?

	PROPORTION OF RESPONDENTS* (%)
Yes	83
No	13
No response	4
Total	100

\*  $n = 231$

TABLE A5.22. Q18—DID YOU ATTEND A HEARING TO SPEAK IN SUPPORT OF YOUR WRITTEN SUBMISSION ON THE [PARK] DRAFT MANAGEMENT PLAN?

	PROPORTION OF RESPONDENTS* (%)
Yes	25
No	69
Someone else spoke in support of my/our submission	6
Total	100

\*  $n = 231$ .

TABLE A5.23. Q19—IF YOU DID NOT ASK TO BE HEARD, WHAT WERE YOUR REASONS WHY?

	PROPORTION OF RESPONDENTS* (%)
I had work obligations	23
The date/time of day prevented me	18
The location was not accessible	27
I felt the written submission was enough	45
My submission was in support of the draft management plan and I did not feel it was necessary to speak to this	7
My interests were being represented by someone else	19
I don't like hearings	9
Other	23

\*  $n = 168$ —Subsample based on those who did not ask to be heard in support of their submission. Total may exceed 100% because of multiple responses.

TABLE A5.24. Q20—PLEASE RATE HOW DIFFICULT YOU FOUND SPEAKING IN SUPPORT OF YOUR SUBMISSION AT THE HEARING.

	PROPORTION OF RESPONDENTS* (%)
Found it very difficult	5
	7
Neutral	16
	26
Found it very easy	44
Don't know / can't remember	2
Total	100

\*  $n = 57$ —subsample based on those who spoke in support of their submission.

TABLE A5.25. Q22—HAVE YOU RECEIVED ANY WRITTEN FEEDBACK ABOUT YOUR SUBMISSION ON THE WHANGANUI NATIONAL PARK MANAGEMENT PLAN REVIEW?

	PROPORTION OF RESPONDENTS* (%)
Yes	45
No	55
Total	100

\*  $n = 231$ .

TABLE A5.26. Q22A—HOW USEFUL WAS THIS FEEDBACK?

	PROPORTION OF RESPONDENTS* (%)
Not very useful	13
	5
Neutral	35
	21
Very useful	19
Don't know / can't remember	7
No response	1
Total	100

\*  $n = 104$ —Subsample based on those who have received written feedback about their submission.

TABLE A5.27. Q22B—IF YOU DID NOT GET FEEDBACK, DO YOU THINK IT WOULD HAVE BEEN USEFUL TO GET FEEDBACK ABOUT YOUR SUBMISSION?

	PROPORTION OF RESPONDENTS* (%)
Yes	70
No	6
Don't know	18
No response	6
Total	100

\*  $n = 127$ —Subsample based on those who did not receive written feedback about their submission.

TABLE A5.28. Q23—HOW WELL DO YOU THINK THE MANAGEMENT PLAN REVIEW TOOK ALL POINTS OF VIEW INTO ACCOUNT?

	PROPORTION OF RESPONDENTS* (%)
Did not take views into account at all	10
	11
Neutral	23
	13
Fully took account of all views	7
Don't know / can't remember	31
No response	5
Total	100

\*  $n = 231$ .

TABLE A5.29. Q27—DID YOU PREPARE YOUR SUBMISSION ON THE [PARK] PLAN AS AN INDIVIDUAL OR AS A REPRESENTATIVE OR MEMBER OF AN ORGANISATION?

	PROPORTION OF RESPONDENTS* (%)
Individual	59
Organisation	29
Other (please explain)	6
Both individual and organisation	6
No response	0
Total	100

\*  $n = 231$ .

TABLE A5.30. Q28—DO YOU PARTICIPATE IN OR ARE YOU A MEMBER OF ANY OUTDOOR RECREATION, CONSERVATION OR ENVIRONMENTAL GROUPS?

	PROPORTION OF RESPONDENTS* (%)
No	30
Yes (please give the name(s))	69
No response	1
Total	100

\*  $n = 150$ —subsample based on those who completed the submission as an individual.

TABLE A5.31. Q29—PLEASE INDICATE THE TYPE OF ORGANISATION YOU PREPARED A SUBMISSION ON THE WHANGANUI NATIONAL PARK DRAFT MANAGEMENT PLAN FOR.

	PROPORTION OF RESPONDENTS* (%)
Conservation or environmental group	12
Outdoor recreational group	40
Concessionaire	7
Business	10
Māori/Iwi/Hapū group	1
Local/regional government	5
Central government	1
Other	22

\*  $n = 92$ —subsample based on those who completed the submission as a representative of an organisation.

Note: total may be less than 100% due to rounding.

TABLE A5.32. Q30—IN WHICH AGE GROUP ARE YOU?

PROPORTION OF RESPONDENTS* (%)	
15-19	1
20-29	3
30-39	12
40-49	18
50-59	29
60-69	23
70+	12
95	3
Total	100

\*  $n = 231$ .

TABLE A5.33. Q31—ARE YOU MALE OR FEMALE?

PROPORTION OF RESPONDENTS* (%)	
Male	74
Female	23
No Response	3
Total	100

\*  $n = 231$ .

TABLE A5.34. Q32—WHICH ETHNIC GROUP(S) DO YOU BELONG TO?

PROPORTION OF RESPONDENTS* (%)	
European/NZ European/Pakeha	68
Māori	4
Pacific Islander	1
Asian (incl. Indian)	0
New Zealand / Kiwi	37
Other ethnic group	1
Prefer not to say	3

\*  $n = 231$ .

Note: total may exceed 100% because of multiple responses.



TABLE A5.35. Q33—AND WHICH OF THE FOLLOWING BEST DESCRIBES YOUR HIGHEST QUALIFICATION?

	PROPORTION OF RESPONDENTS* (%)
No qualification	4
School qualification	15
Certificate or Diploma	14
Polytechnic/University courses below Bachelors degree	14
Bachelor degree	18
Post-graduate degree (Honours, Masters, PhD)	22
Other	6
Don't know	1
Refused	4
No response	2
Total	100

\*  $n = 231$ .

TABLE A5.36. Q34—AT PRESENT ARE YOU...?

	PROPORTION OF RESPONDENTS* (%)
Self-employed / business owner	33
Full-time salary or wage earner	37
Part-time salary or wage earner (less than 30 hours per week)	9
Retired	21
Full-time home-maker	2
Student	3
Unemployed	0
Other beneficiary	0
Other	5
Prefer not to say	1

\*  $n = 231$ .

Note: total may exceed 100% because of multiple responses.

TABLE A5.37—Q35 WHAT WAS YOUR INDIVIDUAL INCOME LAST YEAR, BEFORE TAX?

	PROPORTION OF RESPONDENTS* (%)
Nil income or loss	0
Under \$20,000	9
\$20,001-\$30,000	10
\$30,001-\$50,000	21
\$50,001-\$70,000	17
\$70,001-\$100,000	11
\$100,001 and over	5
Unsure	3
Prefer not to say	23
No response	2
Total	100

\*  $n = 231$ .

TABLE A5.38. Q36—IN WHICH OF THE FOLLOWING AREAS OF NEW ZEALAND DO YOU LIVE?

	PROPORTION OF RESPONDENTS* (%)
Northland	0
Auckland	8
Waikato	5
Bay of Plenty	6
Hawke's Bay	2
Taranaki	2
Manawatu-Wanganui	7
Wellington-Wairarapa	7
Tasman	14
Nelson	12
West Coast	2
Canterbury	12
Otago	5
Southland	13
Other	3
No Response	2
Total	100

\*  $n = 231$ .

TABLE A5.39. Q37—HAVE YOU MADE SUBMISSIONS ON ANY MANAGEMENT PLANS OR STRATEGIES FOR ANY OTHER PROTECTED AREAS ... ?

	PROPORTION OF RESPONDENTS* (%)
A conservation management strategy for an area	25
A conservation management plan for a specific site (e.g. a forest park or reserve)	26
A national park management plan	38
A marine reserve management plan	13
A resource consent process	31
A proposed regional or district plan	35
A designation process for an area of land	16
A long-term council community plan	26
Other	7

\*  $n = 231$ .

Note: total may exceed 100% because of multiple responses.

***How effective are the public input parts of DOC's statutory planning processes?***

*This study set out to evaluate the effectiveness of public participation in the New Zealand Department of Conservation's (DOC's) statutory planning processes, focussing on assessments of five recent National Park Management Plan reviews and one Conservation Management Plan review. It identifies the main constraints to public participation and provides recommendations for ways in which statutory participation processes can be improved.*

Wouters, M.; Hardie-Boys, N.; Wilson, C. 2011: Evaluating public input in National Park Management Plan reviews: facilitators and barriers to meaningful participation in statutory processes. *Science for Conservation* 308. 104 p.