Brian Dobbie Senior Service Designer, Heritage and Visitors Unit Department of Conservation

13 September 2019

Dear Brian,



# RE: Feedback on hut service standards

Thank you for offering Federated Mountain Clubs the opportunity to provide feedback on the Hut Service Standards documentation currently being reviewed by the Department of Conservation.

Federated Mountain Clubs was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of more than 21,000 members in 94 clubs nationwide. Our members are involved in outdoor pursuits including tramping, mountaineering, packrafting and caving. Our membership has a long history of involvement with building and maintaining backcountry huts, and generally view huts as being primarily for shelter, modest in structure, subservient to the environment, and communal.

New Zealand's hut landscape has shifted dramatically in the 15 years since the current version of the standards was introduced. Pleasingly, few huts have been removed over this period. However, we note that it is only through the work of volunteer groups such as Permolat and others funded by the Backcountry Trust that the current network of huts and tracks has been maintained.

FMC is cognisant of the need for standards as a tool to ensure consistency in the design, construction and maintenance of huts, as well as durability and appropriateness for use and location. However, there are some sections of the current version of the standards that are cause for concern, especially given the impacts of increased overseas visitors, the Te Araroa trail and the drive towards widespread use of the online hut booking system.

The matter of hut service standards should be viewed as part of the broader context that includes track standards, Departmental and other bodies' promotional/information publications, and the raft of other influences that can be deployed to influence the type and numbers of hut users.

FMC fully supports the continued usage of the Recreational Opportunities Spectrum and Visitor Management Zoning. They have proven themselves as effective instruments over three decades, enjoying enduring buy-in from all key stakeholders.

### Huts in the context of the wider accommodation industry (1.7 – Hut categories)

"... in the context of the accommodation industry... the Department's Backcountry Comfort Seekers huts are at the spartan end of the accommodation spectrum."

It is inappropriate in this context for the backcountry hut network to be included in any discussion relating to the wider accommodation industry. Huts in New Zealand are first and foremost for shelter in an outdoor recreation and conservation context and must remain that way in the face of tourism pressures.

## Maximum size of huts (2.2.1; 3.2.1; 4.2.1; 5.2.1)

"For new huts, and extensions and upgrades of existing huts, maximum size shall be ... 60 people [Great Walks], 35 people [Serviced and Serviced-Alpine Huts], 20 people [Standard Huts], 20 or 6 people [existing and new Basic Huts respectively].

It must be remembered that huts on public conservation land are for shelter for in a New Zealand outdoor recreation context. This, and, of course, the underlying conservation values, should shape a supply-focussed approach to appropriate maximums.

FMC is not comfortable with arbitrary limits being placed on hut sizing, especially at the higher end of the scale, as limits can often be treated as a standard to aim for. The capacity of a hut - either a new build or an upgrade - should always be appropriate to its place in the landscape, existing hut usage patterns and the capacity of the existing track. Having said that, the present Great Walk lodges, despite their modest colours and materials, can hardly be said to be subservient to their physical environments. Additionally, their already large capacities mean that their social environments tend to be fragmented. Larger huts would only increase these effects.

A closely linked consideration - that can work in the manner of a feedback loop - is that increasing hut sizes, especially on Great Walks, can lead to ongoing upgrades to track surfaces, permanently altering the natural landscape and potentially detracting from the experience of hut and track users.

The above principles also apply to serviced and serviced-alpine huts. Further, many of these are in exposed situations and should not be allowed to grow to dominate those environments.

FMC therefore does not agree with the proposed changes to maximum sizes for Great Walk, serviced, and serviced-alpine huts. Maximums should remain as at present, aside from the Great Walks huts, where 60 bunks is too many; 40 has generally worked well on current Great Walks. We would also like consideration given to multiple smaller bunkrooms in these huts to lower sleep disturbance and help with warmth for smaller parties in winter.

We support the proposed maximums of 20 for standard huts and 20 or six for basic huts.

#### Crowding at huts (2.2.3; 3.2.3; 4.2.3; 5.2.3)

"During the peak season, if the hut capacity is exceeded by 10% or more, over 10% of the season, management shall take action to prevent this happening the next season."

Huts are designed to be communal facilities and play an important role in the learning and reinforcement of social and backcountry etiquette. Crowding, especially in adverse weather conditions, should not be seen as an adverse outcome that needs to be fixed. Rather, provided there is no detriment to safety, it can be a valuable opportunity to reinforce the need to share, to take turns, to carry a tent or a bedroll and to make room for others.

In the decade and a half since the current standards were implemented, we have seen a significant upsurge in the number of huts and campsites added to the online booking system. Booking systems and pricing are only two of the tools in the toolbox, and we urge the Department to use alternate means to manage supply; examples are track standards, content of promotional material, and where booking applies, Kiwishare.

# Cookers (2.5.1; 3.5.1; 4.5.1; 5.5.1)

"Provision of cookers is particularly desirable in huts where large numbers of inexperienced "Backcountry Comfort Seekers" would otherwise have to use their own cookers. The potential for injury or fire damage in such situations can be high."

FMC disagrees with this position, which accepts a sinking lid with respect to the preparedness of backcountry users, in all respects (not just use of cookers). It is reasonable that New Zealand backcountry users expect

international visitors to fit in with New Zealand backcountry protocols - including being properly equipped and self-sufficient.

The potential for injury or fire damage needs to be carefully weighed against the need for all backcountry users, regardless of their experience, to be sufficiently equipped for their intended route, including its full range of potential physical and social demands. The Department has ample opportunity to promulgate this message via print media, track signage, websites and social media - and should be a leader in this area.

### Cooking bench (2.5.2; 3.5.2; 4.5.2; 5.5.2)

"The aim with the larger huts is to cater for 80% of people cooking at the same time when the hut is at capacity."

FMC considers it impractical to have 80% of a full hut's occupants cooking at any one time. Cooking spaces have a natural ebb and flow throughout the course of an evening - hot drinks and family meals at the beginning of an evening, adult groups later in the evening, then preparation for the next day's tramp (e.g. boiling water) at the end of the evening.

Again, social etiquette and backcountry norms come into play - if the cooking area is full, hut users simply need to wait their turn. Adaptability is inherent to the backcountry environment, whether it be changing plans for the weather or delaying usage of hut facilities to accommodate other users.

### Information for users notice (2.10.9; 3.10.9; 4.10.9; 5.10.9)

"A hut user information notice shall be supplied (the standard national notice).

In huts frequented by tourists and beginner trampers, and any other hut at which the need is perceived, hut user information notices should make reference to 'shelter from the storm' - that bastion of outdoor goodwill that ensures hut users will make room for those forced into a hut, without a booking or valid hut ticket, because of adverse weather conditions.

Overall, signage should be used judiciously and in a way that does not detract from the atmosphere of huts.

#### **Additional comments**

FMC is opposed to food sales and wifi availability in huts. These are abrasive to the kaupapa of backcountry recreation.

FMC endorses the submission on hut service standards put forward by the Backcountry Trust.

Thank you again for the opportunity to submit feedback on the current Hut Service Standards. Please feel free to contact me directly if you would like to discuss any aspect of our submission.

Nga mihi,

**Tania Seward** 

Vice President

Federated Mountain Clubs

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