29 October 2026

David Hayes
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Department of Conservation

submitted by email to: picton@doc.govt.nz

Federated Mountain Clubs of New Zealand Inc.

Submission to the Department of Conservation on Proposed Changes to the Queen Charlotte Track

Tēnā koe David,

Introduction

Federated Mountain Clubs of New Zealand (FMC) was founded in 1931. We represent over 90 outdoor recreation clubs and over 23,000 outdoor recreationists nationally. Our community spans widely across outdoor disciplines. Our objectives are to promote and advocate for non-commercial outdoor recreation, as well as the conservation and wise management of, and public access to, New Zealand's natural areas, mountains, lakes, rivers and coast.

The Queen Charlotte Track (QCT) is one of New Zealand's premier multi-day walking experiences. Its reputation has been built over decades on a combination of spectacular ridge-top viewpoints, continuous access to natural landscapes, and a high-quality backcountry recreation experience. These values are central to the track's national and international standing.

FMC is submitting on the proposed changes to the Queen Charlotte Track because the track is a nationally significant recreational asset, and its future route matters to our members and the wider tramping community. We are aware that the submission deadline was 31 July 2026, however FMC was only advised of the proposal in mid August by a local community group. FMC was also not consulted directly on the proposals, despite being the national representative body for recreational walkers and trampers, and having a long-standing interest in DOC-managed tracks. We therefore ask that this late submission be accepted and given due consideration.

Summary of our key points

FMC opposes any significant rerouting of the QCT away from its established ridgeline alignment unless a compelling and evidence-based case can be demonstrated that the proposed changes will materially improve the recreational experience, environmental outcomes, and long-term sustainability of the track.

The track's reputation rests on its ridge-top views and natural character, which would be diminished by moving walkers onto lower tracks. FMC acknowledges that sections of the QCT require ongoing maintenance and periodic improvement to address erosion, weather impacts, land stability, and changing visitor expectations. We support targeted investment in track improvements where necessary. However, we have not seen enough evidence to justify substantial route realignments that diminish the defining characteristics of the QCT or transfer the walking experience from prominent ridge-top landscapes to lower-altitude forestry roads, vehicle corridors, or less scenic alternatives.

The existing route remains fundamentally sound and continues to provide outstanding recreational value. The focus should be on maintenance, resilience improvements, and selective upgrades rather than wholesale relocation.

Accordingly, FMC recommends that the Department of Conservation retain the existing alignment wherever practicable, require robust evidence before approving significant changes to the route, and keep consulting recreation groups, tourism operators and local communities.

The Importance of the Existing Route

The QCT is not simply a transport corridor connecting points within the Marlborough Sounds. It is a destination in its own right, and is recognised nationally and internationally as one of New Zealand's premier walking tracks.

The defining feature of the track is its ridgeline alignment. Elevated sections provide panoramic views across the Marlborough Sounds, allowing walkers to experience the region's distinctive landscape in a way that cannot be replicated at lower elevations. Many of the most memorable parts of the walk are associated with these ridgelines, and the opportunities they provide for scenery, photography, solitude, and immersion in nature.

Over many years, the current route has developed a strong reputation among domestic and international visitors. Guidebooks, tourism operators, accommodation providers and walking clubs all promote the track based largely on the qualities of the existing alignment.

Any proposal that substantially reduces access to these landscape values risks undermining the very characteristics that have made the track successful.

FMC considers that:

- Ridge-top experiences are a core recreational value of the QCT.
- Protecting the scenic quality of the route should remain a primary consideration in track management decisions.
- The existing route has proven its value through decades of successful public use.
- Route changes should only occur where no reasonable alternative exists and there are very good reasons for doing so.

The burden of proof should rest with those advocating significant route changes. Demonstrating operational convenience or maintenance savings does not justify reducing opportunities to experience nationally significant recreation values.

Recreation and Visitor Experience

The primary purpose of the QCT is to provide a high-quality outdoor recreation experience.

Track users consistently identify the scenery, natural character, physical challenge, tranquillity, and a sense of journey as the main reasons for undertaking the walk[1]. The success of the track therefore depends on maintaining these qualities.

FMC is concerned that replacing sections of the purpose-built track with lower-elevation routes, forestry roads, vehicle-access corridors, or substantially modified pathways will diminish the recreational experience.

[1] Queen Charlotte Track, Monthly Report for Trail Managers, 1 March 2026.

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The QCT tramping experience is created by :

- keeping trampers away from vehicle traffic.
- allowing people to be immersed in the natural landscapes of the Marlborough Sounds.
- the diversity of terrain and environments.
- enabling access to viewpoints and natural features that would otherwise be difficult to reach.
- A sense of journeying through the landscape.

Route alterations that reduce these experiences are likely to negatively affect visitor satisfaction and weaken the track's reputation.

While maintenance efficiency and management practicality are important considerations, they should not outweigh the recreational values that visitors come to expect on the QCT.

The Department of Conservation (*DOC*) has a long-established role in protecting recreation opportunities for present and future generations. The management of the QCT should continue to prioritise quality visitor experiences as the principal outcome.

FMC therefore encourages DOC to protect those qualities that track users' value[2] when evaluating any proposed route changes.

Long-Term Sustainability and Track Management

FMC recognises that the QCT faces increasing challenges from extreme weather events, erosion, slips, vegetation growth, and ageing infrastructure.

These challenges are not unique to the QCT. Many of New Zealand's premier walking tracks face similar challenges. They should be addressed through strategic maintenance and resilience planning rather than assuming that large-scale relocation represents the best solution.

Potential measures include:

- Improved drainage systems.
- Retaining structures in erosion-prone areas.
- Better surface construction techniques.
- Enhanced stormwater management.
- Targeted rerouting of small problem sections.
- Increased investment in preventive maintenance.

Such approaches can often preserve the recreational values of existing tracks while addressing environmental and operational concerns.

Major rerouting should be considered only when:

1. A section cannot be maintained safely or economically over the long term.
2. Geotechnical investigations show that significant environmental degradation is occurring.

[2] Queen Charlotte Track, Monthly Report for Trail Managers, 1 March 2026.

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3. There is clear evidence that no practical option exists for improving the current route.

4. Key recreation values can be maintained or enhanced through relocation.

FMC has not seen compelling evidence that these tests have been met for substantial realignments of the QCT.

Our preferred approach is for incremental improvement of the existing network rather than replacing sections that provide significant recreational benefits to QCT users.

Recommendations

FMC recommends that the Department of Conservation:

- Recommendation 1. Retain the existing Queen Charlotte Track alignment wherever practicable.
- Recommendation 2. Recognise the ridge-top character and scenic values of the current route as nationally significant recreation assets.
- Recommendation 3. Prioritise maintenance, resilience improvements, and targeted upgrades over major route relocations.
- Recommendation 4. Require clear and robust evidence demonstrating recreational, environmental and economic benefits before approving significant rerouting proposals.
- Recommendation 5. Ensure that any future changes maintain or improve the overall recreation experience for walkers.
- Recommendation 6. Continue to engage with recreation organisations, walking groups, track users, tourism operators and local communities before making final decisions on route changes.

Conclusion

The QCT is one of New Zealand's great walking experiences. Its success is founded on the qualities of the existing route, particularly its scenic ridgelines, natural character and immersive recreation experience.

FMC supports ongoing efforts to improve track sustainability and resilience. However, these objectives should be achieved while protecting the characteristics that have made the track a nationally significant recreational asset.

For these reasons, FMC opposes substantial realignment of the QCT and recommends that the Department of Conservation focus on maintaining and enhancing the existing route wherever feasible.

Yours sincerely,

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