

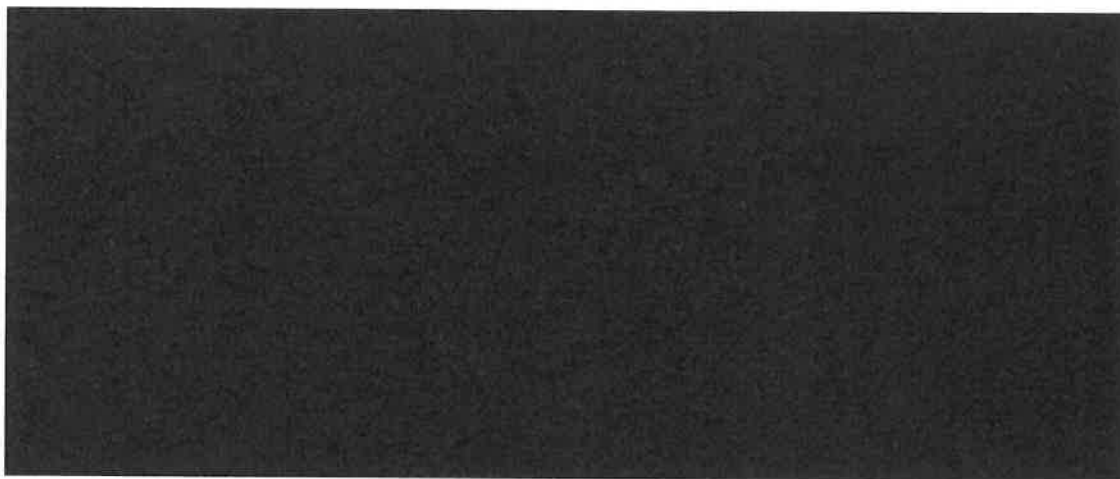
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

OPPOSE THIS APPLICATION

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

All of it

My submission is [include the reasons for your views]:

I oppose this application because I believe that it is taking away the fundamental purpose of our national parks which is to conserve them in their natural state and where the public (who own them) have the right of entry. I do not want this fundamental legal right to be supplanted by the interests of private individuals and companies.

(101)

(101)

This application also directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use. This is particularly so in this case as there is plenty of freehold land outside the national park that is less than half an hour's drive from the proposed site.

It is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road, (section 5.3.9.2 – 13 page 176).

I have had the privilege as a regular trumper to fiordland national park over the last 30 years to be able to visit the Milford road and areas off it in a pristine and natural environment.

It is with great sadness that I have seen over the years with the large increase in tourist numbers, a growing degradation of the intrinsic values of this area. The very wilderness experience that is inherent in this area is becoming eroded and allowing further private development in the form of this application will only serve to destroy further that unique experience of the Milford road and the surrounding areas. The very experience that visitors come to see.

As a regular trumper to this area it is a unique and precious place to easily get into the wilderness. This accommodation facility will destroy that experience for myself and other people who seek this, and indeed the future generation of people who may never get to experience this if we allow the continually development of our wilderness areas.

I am also very concerned that this application will set a precedence in our National Parks and conservation areas and will open up our precious wilderness areas to privatisation and the restriction of them to only those that can pay.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

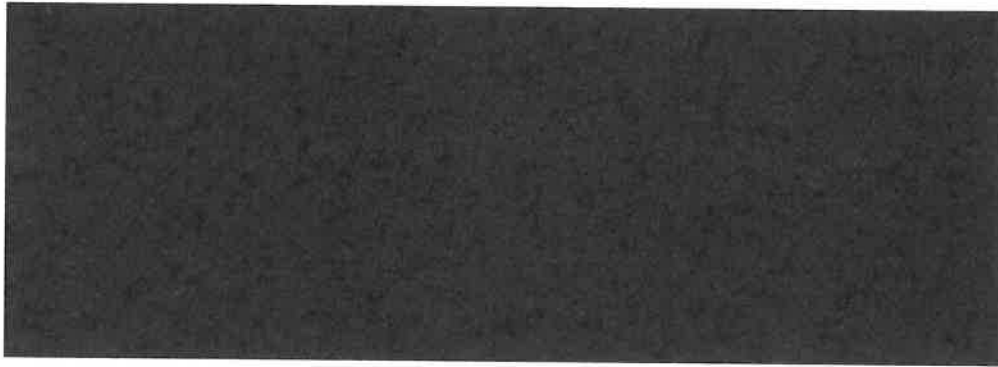
I would like this application to be denied in full. I would like our National Parks to be left in their natural state without private development. I would like this area to be left so that not only the people here today but future generations can readily see and experience a unique wilderness that is fast disappearing from the world. This area belongs to the people of New Zealand. It does not belong to the Minister or to DOC. DOC have an absolute responsibility to preserve this area and other conservation areas in their natural undeveloped state.

As an owner I DO NOT WANT THIS APPLICATION TO PROCEED.

(101)

(101)

G. Your Signature



19 July 2018

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

101

101



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eginton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): Do / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:
The entire proposal

501

102

My submission is [include the reasons for your views]:

This proposal contradicts NZ National Parks Act. It appropriates public resources for private commercial benefit. There is no need for the proposed additional facility. The Fiordland National Park Management Plan recognises this by preferring new visitor facilities to be established at existing modified sites such as the existing camp at Knobs Flat

I object to the entire application from Path New Zealand Limited on the grounds that the proposal:

- Conflicts with purpose of maintaining national parks in their natural state and being places where the public have right of entry
- Directly contradicts policies for accommodation in section 9 of General Policy For National Parks especially 9(d) which states that applicants should place accommodation outside of the park or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use
- Is contrary to the Fiordland National Park Management Plan; specifically the objectives for the Milford Road (section 5.3.9.2 – 13 page 176)

The details submitted by the applicant shows that many important details await the final design phase. I hope that the resource consent process will provide further opportunity for comment on the finalised design

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Rejection of the total application

G. Your Signature



18/7/18
Date

Please complete this form and send to DNSubmissions@dca.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor

503

102



A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-

[Redacted area]

D. Statement of Support/Opposition

I (circle one) ~~Support~~ / ~~Neutral~~ / **Oppose** this Application.

E. Hearing Request

I (circle one) ~~Do~~ / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

This submission relates to the ENTIRE proposal.

My submission is [include the reasons for your views]:

I strongly believe that our Natural Parks must not restrict or limit the rights of our people to access them, especially for private profit.

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103

This proposal conflicts with the purpose of maintaining national parks in their natural state and where public have the right of entry.

The proposal directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use.

The proposal is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road, (section 5.3.9.2 – 13 page 176)

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Decline the entire proposal.

G. Your Signature



Date 19/7/2018

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

(20)

(103)

Submission on a Publicly Notified Concession Application by Path New Zealand Limited

To: Director-General
c/o Department of Conservation
PO Box 5244
Moray Place
Dunedin 9058

Attention: Lisa Wheeler - Permissions Advisor

Permission Application Number and Name of Applicant:

64177-ACC – Path New Zealand Limited (Path NZ).

Name of Proposed Activity and Location(s):

Path NZ is applying for a concession to lease an unspecified area of land for a term of 30 years under s 50 of the National Parks Act to build and operate a commercial structure in Fiordland National Park, i.e. on public conservation land managed by the Department of Conservation (DoC). The application includes the construction and continued operation of four main elements:

Accommodation facilities for up to 40 guests plus associated staff and associated services. Facilities consist of 6 main buildings, including:

A common area for guests, including dining facilities;

Four accommodation buildings, each with five private rooms with ensuites;

Staff accommodation for eight staff; and

Associated facilities, including a generator / storage shed.

A car park for approximately 30 cars, which is sufficient to cater for buses;

A 500m all-weather quad bike and trailer access track; and

A nature trail.

Submitter Information:



101

104

Statement of Support / Opposition:

I oppose this application in its entirety.

Hearing Request

I do wish to be heard in support of this submission at a hearing if needed.

Submission:

The specific parts of the application that this submission relates to are:

The application in its entirety.

The Department of Conservation has a statutory requirement under s 6(ab) of the Conservation Act 1987 to preserve so far as is practicable all indigenous freshwater fisheries, and protect recreational freshwater fisheries and freshwater fish habitats. The applicant has not identified what measures it will take to prevent fish habitat degradation.

The water quality of the Eglinton River is high and visual clarity is exceptionally high in all but rain events. It is highly sought after by anglers because of these qualities as it affords sight fishing for the resident brown and rainbow trout.

The applicant fails to identify and acknowledge the historical usage of anglers and the high angling amenity of the area. That amenity will be significantly compromised by the construction of what is proposed. Angling amenity goes well beyond the trout fishery itself and includes the setting in which the activity occurs. I have fished this area since the mid 1980's and guided anglers since 1994 often walking right through the area where the buildings are proposed to go on my way back to my vehicle after fishing up from either Smithy Creek or the Dore Pass car park. The approval of this application will force me elsewhere for that feeling of isolation in an unmodified environment that my clients seek. Such areas for back country angling are finite and in high demand. The loss of a back country fishery will displace anglers from this section of the Eglinton and I find that unacceptable both as an angler and an existing DoC concessionaire.

The Conservation Act 1987 Section 17u (4) stipulates no structure is to be constructed on Conservation if a viable site exists outside of the area. The applicant has failed to investigate alternative sites outside of the National Park.

The existing outstanding natural landscape will become forever modified with the track and building site and this is unacceptable to allow a commercial interest that provides no service to the general public as a whole when alternate sites outside the conservation area have not been investigated and do actually exist.

In contrast the existing buildings and infrastructure at the southern end of Knobs Flat are long established and serve or have served the interests of the general public which differs greatly from what the applicant proposes. They are on existing modified land. The applicant differs greatly in that they propose to utilize an unmodified landscape and that is inconsistent with specific management outlined for the Milford Road in the Fiordland National Park Management Plan (2007)

Objectives

1. The Fiordland National Park that adjoins the Milford Road will be managed to provide for and protect the following attributes:

401

106

- a) The spectacular views of forested catchments, open grasslands, lake systems and outstanding mountainscapes;
- b) Its significant indigenous flora and fauna;
- c) A place which is a destination in its own right;
- d) The Eglinton Valley's open and uninterrupted views of the surrounding mountains and valleys and its overall sense of naturalness;
- e) The steep, winding and narrow character that forms large parts of the adjoining road;
- f) The easily accessible and safe visitor opportunities at designated sites;
- g) The valuable access for many who are accessing remote parts of Fiordland National Park;

Objective 13 - Activities associated with commercial recreation or tourism proposals, including new facilities, should only be authorised where:

New proposals for travellers' accommodation should be considered in accordance with Chapter 9 of the General Policy for National Parks 2005; however, in general it is considered that there is adequate travellers' accommodation provided within Fiordland National Park or at nearby locations; and (e)

Preference should be given to any facility development that utilises previously modified sites and provides new opportunities for Fiordland National Park visitors, but is still in keeping with the national park setting.

Section 17W(1) of the Conservation Act provides that where a Conservation Management Strategy ('CMS') has been established for a conservation area, and the strategy provides for the issue of a concession, a concession shall not be granted unless the concession and its granting is consistent with the strategy.

In summation, this is an unnecessary development in Fiordland National Park that will impede and displace historical users. It will compromise the World Heritage Status the area currently has and that is to be protected through various Acts and Management Plans. So I ask that the concession application by Path NZ be declined in its entirety.

Signature:



Signature

Date: 18 July 2018

104



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

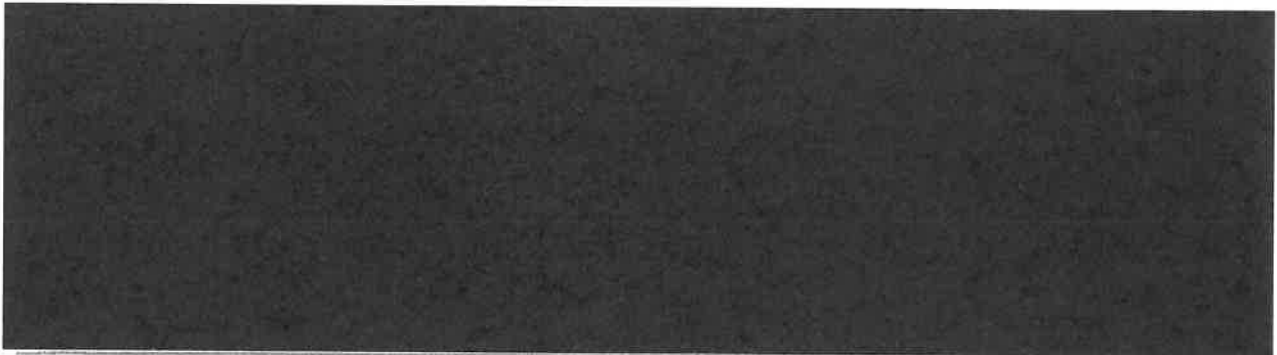
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

- Accommodation facilities (includes staff accommodation) and associated services
- An access track
- A nature trail – if it excludes public access long term

201

105

My submission is [include the reasons for your views]:

Firstly, the direct impact of the proposal on the environment and other user's experience. I disagree with the applicant who considers the area "modified". The only modification *in the proposed site* is historic grazing which has been banned for almost 20 years in order to help restore the areas to its natural state. Historic grazing is not a reason to permit a move further away from the area's natural state. I urge DOC to hold to a strict (and common sense) definition of the word "modified" and do as the Plan states, by giving preference to "already modified sites". If the application is allowed to proceed on the basis of the area being "modified" then the entire Park is up for further modification, having already been "modified" by deer, possums, stoats and the like. Likewise, if modifications well removed from the proposed location are justification for this proposal then much of the Park is up for further modification on this basis also. (The applicant suggests the historic road workers' accommodation site at Knob's flat and even Gunn's camp show the entire Eglington Valley is modified and therefore permits "new facilities")

There would be a visual impact for other users, especially at night when one's eyes are drawn to light. For example, the NZTA sign at the Kiosk up the Milford Road draws one's attention when looking up Lake Te Anau. Other regions have recognised the value of dark areas. While the application points out the light may not be visible from vehicles on the Milford Road, it would be highly visible for alpine climber, trampers, hunters and others who venture off the road ("existing recreational opportunities" DOC "must still consider"). Also, all road users will see the car park, parked vehicles and, presumably, signage (not mentioned?). I think the user experience of the Milford Road is enhanced by keeping signs and car parks along the way to a minimum. The access track is through virgin forest and would provide easier access for pests in an area home to mohua and native bats.

The noise from the diesel generator will diminish people's experience of the environment (including those staying at the site). I think it is reasonable for all users to expect to get away from unnatural noise by venturing away from the Milford Road.

Secondly, there are alternatives. The alternatives considered by the applicant, may not have views up the Eglington Valley but those views are available as part of the trip to Milford and there are alternative natural views, such as across Lake Te Anau to the Murchison and Stewart Mountains. I am confident the applicant could find a means of locating accommodation out of sight of the "budget accommodation" at Te Anau Downs.

Thirdly, I have concerns about precedent, both for the Fiordland National Park and for other National Parks. To me, the experience of going to Milford Sound is about the build-up on the journey there, through the wide, open Eglington Flats; slowly feeling pressed in by towering mountains; emerging from the Homer Tunnel high on the mountainside; crossing rivers; driving through native bush and bursting out with the view of Mitre Peak and the Sound. If the applicant's reasons are deemed sufficient to allow the project to proceed, how will DOC justifiably decline future requests in Fiordland and other National Parks?

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I would like the entire plan declined. If it were granted, I would want to ensure long-term public access to the walking trail. As an alternative to exclusive access, I suggest DOC bans freedom camping within a greater distance of the entire Milford Road (say 500m) to help protect the environment and the experience for those using the proposed accommodation as using other sites (Finding toilet paper, excrement and rubbish seriously detracts from my experience of the conservation estate. Additionally, I would happily see heftier fines for those who flout the rules in order to help deter such activity, cover the costs of compliance officers and demonstrate NZ highly values its natural environment). As pointed out in the application, DOC provide accommodation along the Milford Road and with user numbers and existing environmental damage, it is reasonable to expect campers to use the facilities or be well away from the road (hunting, for example).

If the proposal proceeds, I would also like DOC to specify maximum noise at specific distances and times, aiming for the lowest practical level and using both building materials and landscape (such as earth and plantings) to minimise noise. I suggest DOC require the applicant to install solar panels and batteries in order to minimise the need for noise and diesel pollution.

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105

G. Your Signature

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12/07/2018

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor

105

102



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

I Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The entire proposal

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Our submission is:

We are opposed to this application in its entirety.

Reasons:

We are opposed to private developers using public land for private profit.

The proposal is inappropriate in a national park.

The National Parks Act 1980 gives emphasis to 'preservation in perpetuity'. In Section 4 it states: 'Parks to be maintained in natural state, and public to have right of entry'.

The proposal is inconsistent with policies in General Policy for National Parks regarding accommodation, in particular section 9 (d) that states that applicants should place accommodation outside of the park, or share existing facilities, and also section 9(e) which states that any new facilities should not be for exclusive use and should provide for public use.

The proposal is contrary to the Floridland National Park Management Plan, in particular section 5.3.9, Frontcountry Visitor Setting, objectives for Milford Road, (section 5.3.9.2 - 13 page 176).

Action sought:

That the application in its entirety be declined.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

(201)

(106)



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:
Whole of application.

301

107

My submission is [include the reasons for your views]:

I have been travelling the Eglinton Valley at various times since the early 1970's and it is one of the very special places accessible by road within the Fiordland National Park. The tussock covered open river flats, the beech forest, the lakes and the surrounding steep sided mountains are just spectacular and uninterrupted by human input other than at knobs flat and the road. When you are away from the road there is a special feeling of isolation. There should be no more human modification of this wonderful valley, except perhaps by getting rid of the introduced Russell Lupins.

The Eglinton valley also the home of special populations of Long Tailed and Short Tailed bats which need to be managed so that there are no further declines in population. Building and construction activity is detrimental to the existence of the bats.

I totally oppose any new commercialisation of our wonderful National Parks. Excessively high tourist numbers is threatening to destroy the beautiful and amazing locations we have in our National Parks. I believe that Milford Sound is way over the limit that should be allowed to visit and the additional accommodation sought in this application has the expressed aim at increasing visitor numbers to Milford. We are close to losing this golden egg and for many New Zealanders Milford is now not a nice place to visit as it is too over crowded and commercialised.

It is actually hard to believe that the department is even considering this application as it totally against the purpose of National Parks which is to maintain them in their original state both physically and ecologically, whilst allowing free access to the general public. The proposed accommodation and associated services are totally against your own policies. It is totally at odds with policies for accommodation in Section 9 of the General Policy for National Parks, and especially sub section 9d which says that applicants should place accommodation outside the park, or share existing facilities. Additionally sub section 9e says that any new facilities are not for exclusive use and provide for public use .

Additionally, the proposed activity is not consistent with the Fiordland National Park Management Plan, especially as related to the objectives for the Milford Road (sections 5.3.9.2 to 13 on page 176).

The department needs to stick to its own rules for how it manages commercial activity on the land that it administers on behalf of New Zealand tax payers so that it does not have to squander its meagre funding on unnecessary legal action.

The application should be declined.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

701

107

G. Your Signature



19/07/2018 _____
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

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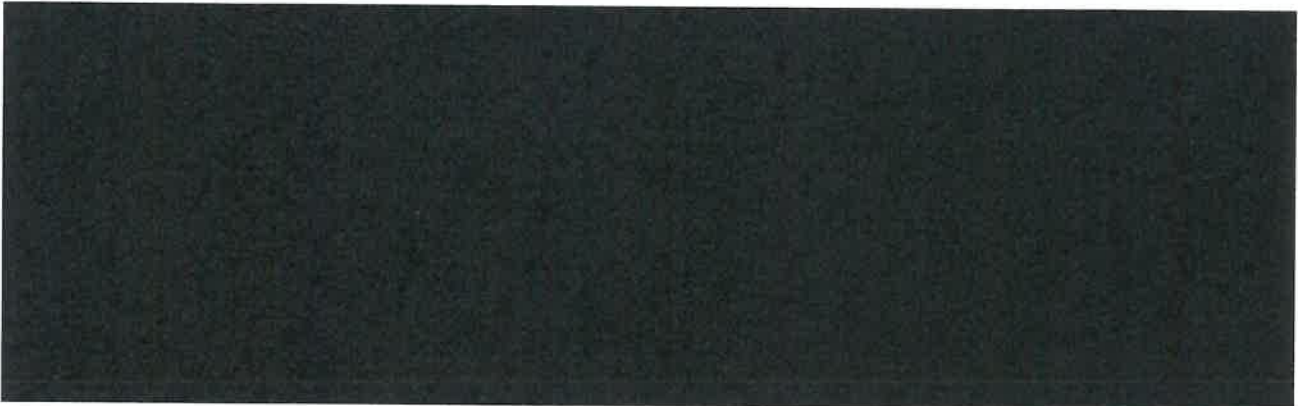
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

I Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The construction and continued operation of:

- Accommodation facilities (includes staff accommodation) and associated services
- A car park
- An access track

Within the boundaries of Fiordland National Park

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108

My submission is that

The proposed lodge, carpark and access track are in an area with few human structures. These facilities, if they are allowed to go in, would impinge on the Eglinton Valley's overall sense of naturalness and create a new built area deeper in the Park, beyond the last settlement at Knobs Flat.

That this proposal directly conflicts with the keeping national parks as places where the public have right of entry to an area in its natural state. It contradicts section 9 of the General Policy for National Parks, which states that where applicants want to put in accommodation, that accommodation should be outside of the park concerned or share facilities that are already in place.

The accommodation and facilities outlined in this application are also clearly intended for the exclusive use of those paying to stay which also contradicts policy 9(e) which states that new facilities should be for public use rather than exclusive use. This goes against the idea that our national parks are for all the public to enjoy.

This application also contravenes the objectives for the Milford Rd that are outlined in the Fiordland National Park Management plan section 5.3.9.2 – 13 page 176

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I want to see this application for new accommodation facilities within the boundaries of Fiordland National Park denied.

G. Your Signature

A large black rectangular redaction box covering the signature area.

19th July 2018

Date

Please complete this form and send to DNSubmissions@doc.govt.nz.

801

108



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) ~~Support~~ / ~~Neutral~~ / Oppose this Application.

E. Hearing Request

I (circle one): ~~Do~~ / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

I oppose all of this application.

My submission is [include the reasons for your views]:

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- Publicly owned national park lands should not be leased out for exclusive private use
- This application conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry. It is clear from the Awaroa Beach purchase that New Zealanders are passionately dedicated to this concept, to the point where thousands of people were motivated to pay to avoid the very thing now being proposed by this application
- This application directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities, but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use.
- This application is contrary to the Fiordland National Park Management Plan, specifically the objectives for Milford Road, (section 5.3.9.2 – 13 page 176)

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

- I wish this entire application to be declined

G. Your Signature

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F



19/7/2018
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

(101)

(109)



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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Oppose this Application.

E. Hearing Request

I (circle one): Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

My submission relates to the entire proposal



My submission is [include the reasons for your views]:

I want the application to be declined, and that the proposal:

- conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry
- directly contradicts policies for accommodation in section 9 of the [General Policy for National Parks](#), (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use
- is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road, (section 5.3.9.2 – 13 page 176)

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

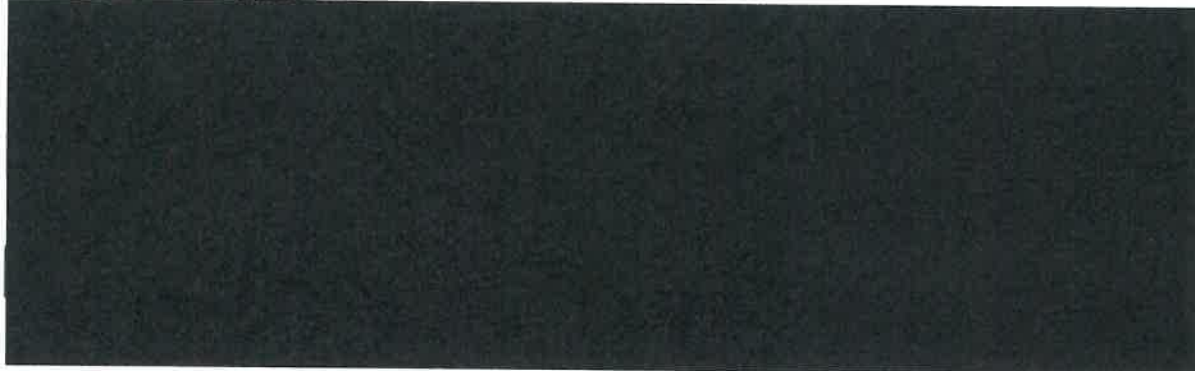
I would like the outcome to have the entire application denied. This application goes against the spirit of keeping our parks open for all the public to enjoy, as well as breaching policies to that effect. This exclusive use is not consistent with our National Parks Act; it appropriates public resources for private benefit. I would like to voice my concern that this special area of our country stays pristine for our future generations. There appears to be no reason to develop this particular area for accommodation as sufficient accommodation is available outside the national park. This application appears to be designed to financially benefit one commercial enterprise, not for the New Zealand people, or the greater good. It seems short-sighted, and not for the great good. With our rivers in poor condition I would also have serious concerns about risk of treated and untreated Wastewater pollution to the land based on septic tanks (pumps can be blocked) and soil treatment environmentally risky. The river seems very close to the building site, and any accidents from use of consumer chemicals, solvents, enzymes, cannot be mitigated if malfunctions (including area flooding) in the system occur.

I would like to also keep my entire submission confidential.

011

110

G. Your Signature



19/6/18
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

110

110

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) ~~Support~~ / ~~Neutral~~ / **Oppose** this Application.

E. Hearing Request

I (circle one): ~~Do~~ / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

- Location
- Accommodation
- Carpark

My submission is [include the reasons for your views]:

Location.

The proposed location encroaches on a wilderness setting when less intrusive alternative sites are available elsewhere in the Eglinton Valley, most notably at Knobs Flat. The site encroaches on the beat of fly fishers moving up and down the river and the view of coach passengers travelling on the Milford Road. The screening effect of the earth berm along the highway north of the proposed development site (photo page 15) is relatively low so will not have the claimed screening effect for coach passengers.

The location enroute to Milford will not reduce congestion, as claimed, because it will increase vehicle flows overall, primarily because of the additional number of small vehicles and vehicle trips, including at peak times, when the movements of staff and related operations are taken into account. All walks identified in the proposal, except the Dore Pass track, require vehicle access. The location will also increase helicopter traffic in the lower Eglinton Valley, during construction and also when the site is operating, for the likes of high-paying guests, guided fishing pick-ups and site servicing for large/bulky objects (e.g. generator replacement).

The secluded location being proposed will require significant track development for construction, especially for plant access, which does not appear to be dealt with in the application.



Accommodation.

The proposed land-based disposal of treated blackwater is culturally insensitive and unsustainable as the nutrients will make their way into the pristine Eglinton River through groundwater, clearly as Fiordland is a very wet environment and the development sits in a stony braided river bed.

The suggested potential planting of tussock to screen the development from the river would make the site more prominent, as the grasslands are heavily modified (see the Google Street view of Knobs Flat).

The proposer confuses commercial factors with operational factors, e.g. claiming the facility "could not operate effectively if freedom campers were in close proximity" (page 22). This is a commercial consideration and not a basis for obtaining a licence-to-operate.

Wood-burning emissions to air, both particulates and odours, do not appear to be considered. Clearly this would impact on the experience of any visitor travelling along the Milford Road when a smoke plume is emitted from the site, either by day or night.

Parking.

The proposed linear, road-side carpark will have an unpleasant visual impact on the scenic values of the Milford Road. The carpark is also likely to increase traffic hazards for Milford Road traffic, given the minimal site distance from the southerly direction and the lack of traffic control structures consistent with a wilderness area and low-impact eco-lodge.

There appears to be a lack of environmental sensitivity with the applicant parties who imply that the area of fallen trees that occupy the proposed carpark site would be environmentally improved by construction of a carpark. Fallen trees provide vital habitat for invertebrate species, fungi, small plants, nursery species and a foraging area for birds.

The carpark could also encourage unwanted absentee parking in the carpark for those walking the Milford Track via Dore Pass.

Application Precedence.

If approved, this would be the first of its kind- a major commercial site on a scenic highway through a national park. Such development is currently restricted to destination sites. Approving this application could set off a number of similar developments.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The location of the proposed facility should be moved to the vicinity of Knobs Flat.

G. Your Signature



20th July 2018
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor



Note: Include pages two and three of this form with your response to D
Do not include page one.

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The entire application

(511)

(112)

Live in Haast and cater to travellers who are generally going between the Glaciers and Queenstown and often as far as Greymouth and Te Anau.

I've grown up with tourism and I talk to customers and guests almost daily for 7 months a year throughout our season in regard to Milford Sound, every single one of them has loved it, rain or shine. How could you not.

Many wished they could have stayed a night, many were disappointed there was not more accommodation available. For the first time ever, it was not only lost revenue but many people were with the town. Too busy.

I support this application for the following reasons:

The New Zealand Government is encouraging more visitors here, and encouraging growth throughout tourism so there must be allowance for businesses to expand and new ideas to be developed to provide for that increase.

This last year there were 600,000 visitors to Milford Sound and it is expected to exceed 1 million in 2010.

The accommodation sector between Milford Sound and Greymouth needs to increase the number of beds available. Last summer there were displaced travellers, many elderly, from Te Anau, Queenstown through to Greymouth because every room in between was full.

In the height of the season, they were sleeping in their cars and not by choice. This is unacceptable.

The Aotearoa market is growing annually and they tend to travel on buses or in bigger family groups. This puts more strain on smaller establishments as the bigger hotel and motel bed space is taken.

Facilities and resources were stretched last season and we need more of everything. It was well publicised how nice of several things are getting.

It is important to give people choice. Not everybody wants to stay in the congested towns of Te Anau or Queenstown and there has to be a diverse range of options available to cater for all needs.

There will always be travellers, foreigners and New Zealanders, who seek to enjoy nature and relative solitude. This number is growing each year also with the continued swelling of the tourist.

Some want or need comfort amongst the isolation. They don't want to pitch a tent, walk kilometres to a hut or freedom camp in a station wagon in a carpark.

Not everybody is happy travelling from Queenstown to Milford Sound and back in one day.

There is only one accommodation option between Te Anau and Milford Sound.

A thorough plan and application has been submitted by Path New Zealand Ltd.

They have an extensive background and understanding of tourism, business and conservation.

They have modelled some of their plan on existing well functioning and similar properties/parks.

The lodge will provide a truly New Zealand experience available only in a very few places in our country and at a very affordable price.

There will be employment created for the local people.

There are other existing lodges within the National Parks of New Zealand which enjoy almost exclusive use of their surroundings, tracks and waterways. Some are so obscure most people don't even know they exist.

Like all of these existing native lodges, this proposed lodge will not be visible from the highway therefore not an eyesore for passers by.

In times when weather closes the road to Milford the lodge will provide a welcome and safe environment for travellers who become stranded. They will provide shelter, safety, and the ability for people to contact their families or travel agents and insurers if needed.

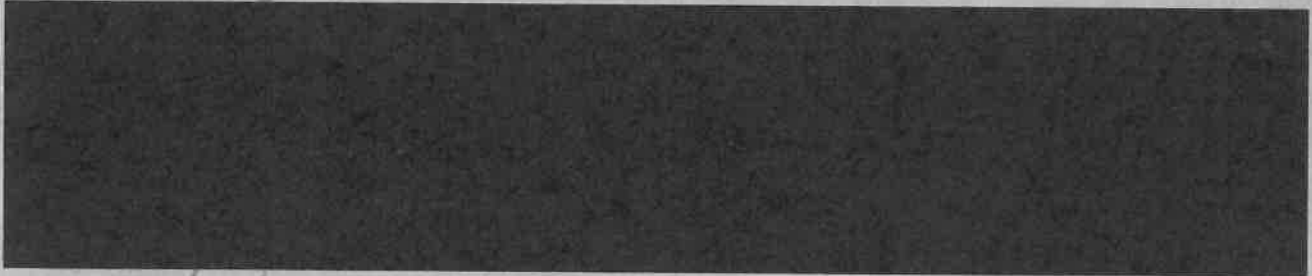
Our Government is putting pressure on other industries and pushing tourism so something will have to give. I believe the time will come where the Department of Conservation will have to consider opening up some private land for permanent structures and buildings to cater to our ever growing numbers of tourists and citizens from New Zealanders. And why should it happen? Concessions are given to operate all sorts of business and occupation already. It comes down to management from both sides and anything is possible.

From what I can see, the Path team looks like the right team to set the bar at a very high standard and that is the reason I'm in support of their proposal.

What outcomes would you like to address with your submission? [give precise details, including the of the application you wish to have amended and the general nature of any conditions sought]:

I would like to see the application approved

G. Your Signature



Date

20/7/18

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

112

511



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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support this Application.

E. Hearing Request

I (circle one): Do Not* wish to be heard in support of this submission at a hearing.

*I am happy to expand on comments, but am overseas at present and thus unavailable for the hearing.

F. Submission

The specific parts of the application that this submission relates to are:

211

113

My submission is [include the reasons for your views]:

I strongly support the Path NZ Ltd proposal to build accommodation facilities and services in the Eglinton Valley. I grew up in Te Anau and recently returned for 2 years, but was sorely disappointed by the lack of facilities in the Milford area, and the state of the few facilities that were available. The desperate need for accommodation and services would be addressed by this proposal, while remaining sensitive to this unique environment. Furthermore, these facilities would alleviate pressure from existing freedom camping areas, which are over-subscribed and difficult for regional authorities to maintain and support.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

G. Your Signature



19 July 2018
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

111

113



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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): Do / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The entire proposal

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114

My submission is [include the reasons for your views]:

This proposal should be blocked in its entirety. This sets a dreadful precedent for further development in national parks and in itself is not required or necessary. It will detract from the natural beauty of the area and the sensation of isolation no matter how heavily this is attempted to be mitigated. Further to these comments the lodge is a contradiction to government policy as stated below.

- conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry
- directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use
- is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road, (section 5.3.9.2 - 13 page 176)

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The only outcome I would find acceptable is the complete rejection of this proposal in any form

G. Your Signature



15/7/18

Date

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111

114



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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

Oppose this Application.

E. Hearing Request

Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

1. This submission relates to the **whole proposal**: the whole proposal conflicts with the purpose of the National Park in maintaining its natural state. The proposal is taking away a section of the NP in creating a non-natural location where people are being encouraged to stay.
2. The proposal directly contradicts section 9 of the General Policy for National Parks which states (9d) that accommodation should be placed outside the National Park or share existing facilities (such as the campsite), and policy (9e) that provides that new facilities must be for public use (eg. a new public toilet

211

115

facility) not private and exclusive as this proposal is.

3. The proposal is contrary to the Fiordland National Park Management Plan specifically relating to the objectives for the Milford Rd.

My submission is [include the reasons for your views]:

Recently we were able to declare that the conservation status of the endangered and endemic Lesser Short-tailed Bat (*Mystacina tuberculata*) could be declared 'recovering' for the isolated population present in the Eglinton Valley. This has followed years of research and persistent pest control in the valley following the bat's chance discovery in the 1990's. This bat is very vulnerable to disturbance and habitat dissection. Its recovery is one small advance in this National Park and only possible because of the clear aim of maintaining the area in its natural state.

We have the management plan for a reason. Its guidance is clear. No exceptions. Any small infringements of the entire National Park will have an impact and once one has been 'exempted' other organisations/ businesses rightly demand their piece.

A proposal for a fully public facility would be difficult enough to justify, however this proposal is for exclusive use of paying guests with the aim of profit for the submitting organisation. The Management Plan and General Policy make it clear that the impact of any changes must be nil and the area outside the NP should be used instead. This also benefits the community outside the NP where services can be provided.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I would like to see the application refused or withdrawn in its entirety.

The applicants should take the comments from all those submitted, and work up a new venture outside the Fiordland National Park, perhaps considering 'spreading the load' (and impact) of tourism by working in areas such as Greymouth which need new economic answers and have ample scope for tourism with this type of support.

G. Your Signature



Date 19 July 2018

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

112

115



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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

We are strongly supportive of the entire application by Path New Zealand Limited for the reasons outlined below.

211

116

My submission is [Include the reasons for your views]:

We are a family of keen outdoors explorers and enjoy the natural beauty of New Zealand.

With a young family we are unable to access large numbers of the currently available DOC huts and back country accommodation. The needs of young children and the impact on other hut users make it very difficult to accommodate in the DOC huts. We have experienced several day walks with backpacks carrying out children, however suitable overnight accommodation is not always readily available, and a lot of huts work on a first come first serve basis. With young children the risk of missing out is not feasible. And the disruption to other hut users is not reasonable.

Engaging with the New Zealand outdoors is an important part of the education that we are looking to provide our family. It is important for us that we have opportunities to show our children that we can engage with our natural environment without adverse effect in sustainable and enjoyable ways. In our view PATH would provide that facility.

Additionally, the time and equipment needed to use these facilities is sometimes difficult to access. With the addition of PATH we will be able solve a number of the current road blocks in taking our family on overnight stays in the national parks.

As our parents are getting to a stage where they are less likely to be able to access the majority of walk in huts in NZ, a facility like PATH will enable 3 generations of family to enjoy the great NZ outdoors and engage in areas that are otherwise inaccessible to them. This would be unique and there is not currently an option available for us to undertake this experience.

As the Department of Conservation controls nearly 30% of New Zealand land, we are keen to see a more diverse range of facilities and providers offering a broader range of experiences that would enable us and others like us to engage with this wonderful national treasure. Hunters, anglers and back country hikers have nearly exclusive access to the vast majority of this huge national asset. Facilities like PATH would enable the less able bodies or the less intrepid a stepping stone to experience a piece of this.

For these reasons we strongly support this application.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

G. Your Signature

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

20/07/2018

Date

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116



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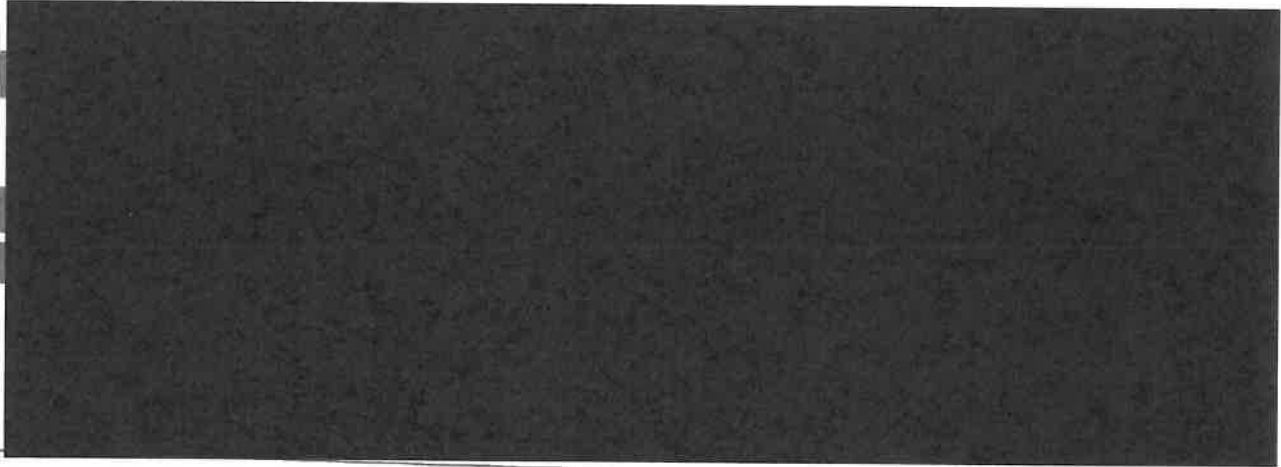
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Oppose this Application.

E. Hearing Request

I (circle one) Do wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The application as a whole is objected to on the basis that the management plan under which the application is being made is overdue for review. The 2007 plan recognised the potential for undesirable impacts from high levels of use. The use levels have increased significantly since the plan became operative. Therefore it is only

511

117

sensible in the interests of protection and conservation of the significant values of the National Park to only consider a major concession application (for term of 30 years) subsequent to the review of the Fiordland National Park Management Plan. It is clear that the issues of visitor/recreation overuse impacting on environmental and conservation values and user experience should be part of the important matters consider in the plan review process.

My submission is [include the reasons for your views]:

Section 4 of the National Parks Act 1980 requires that National Parks are to be preserved, as far as possible, in their natural state. The construction of new buildings in the Eglinton Valley is in conflict with this purpose as it will result in modification of the environment. Human habitation, especially a hotel, will require a power supply, sewerage system, water supply and waste disposal. There is a real risk of adverse effects from inappropriate waste disposal or failure in sewerage or grey water management. A carpark for 30 vehicles is proposed. This does nothing to alleviate the recognised problem of increasing numbers of tourists travelling on the Milford road, nor that of sustainable tourism through reducing use of cars.

Section 43 of the National Parks Act requires the Department to "...administer and manage all National Parks in such a manner as to secure to the public the fullest proper use and enjoyment of the parks consistent with the preservation of their natural and historic features and the protection and well-being of their native plants and animals". It is seen that the granting of a right to construct a hotel is removing an area from general public use.

The 2007 Fiordland Management Plan notes that Fiordland is "essentially free of man-made structures." Construction of a new building within the park will detract from this special feature. The proposed site is not far from the Park boundary. Locating the proposed operation on land outside the Park would not have a detrimental effect on the experience available to the users of the hotel complex. The current management plan (section 5.4 Implementation) states "commercial recreation/tourism activities will only be considered when it can be demonstrated that they cannot be undertaken outside Fiordland National Park".

The Eglinton valley is recognised in the Management Plan as a "biodiversity hotspot" where populations of short-tailed bats, mohua and kaka are monitored. A hotel will potentially attract predators such as rats and stoats, which could subsequently feed on these endangered species. The Management Plan also states that "Fiordland is thought to represent a national stronghold for three species of beech mistletoe", examples of which can be found in the Eglinton valley, close to the road. Research in Canterbury (D Kelly in NZ J Ecol 2005) showed that restoring the bellbird population only partially improved mistletoe pollination; restoration of optimum ecological function likely takes more than one season of predator control, and a hotel

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operation would not aid that control.

In recent years, "success" in bringing an increased number of tourists to New Zealand has revealed a significant number of effects detrimental to the experience many people are having at popular spots on the New Zealand tourist circuit. The increase has put considerable pressure on infrastructure as well as overwhelming natural areas. The resolving of the issues around this increasing tourist and recreation use is a complex matter. The issue of further concessions for one of these popular parks, prior to the overdue review of the Fiordland National Park Management plan, would potentially place added complication to the satisfactory development of plans that meet the requirements of the National Parks Act. The planning process should identify appropriate recreation and tourist possibilities and the Department of Conservation could then seek interest from potential providers where this was seen as warranted. It is not appropriate to consider granting a concession, particularly of this term length, for this lodge/hotel, when the Management Plan is overdue for review. It is noted that the current Management plan had, at the time of adoption, recognised that visitor numbers would potentially be an issue. (Section 5 page 198).

When the Management Plan is reviewed, pressing issues can be considered such as access to the Park (e.g. more public transport, fewer cars), how to best incorporate new business proposals, what sort of buildings can be built in the Park, perhaps promoting a philosophy of sustainability and energy efficiency.

57

117

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

That the application be declined pending the completed review and approval of the Fiordland National Park Management plan.

G. Your Signature



20 / 7 / 2018
Date

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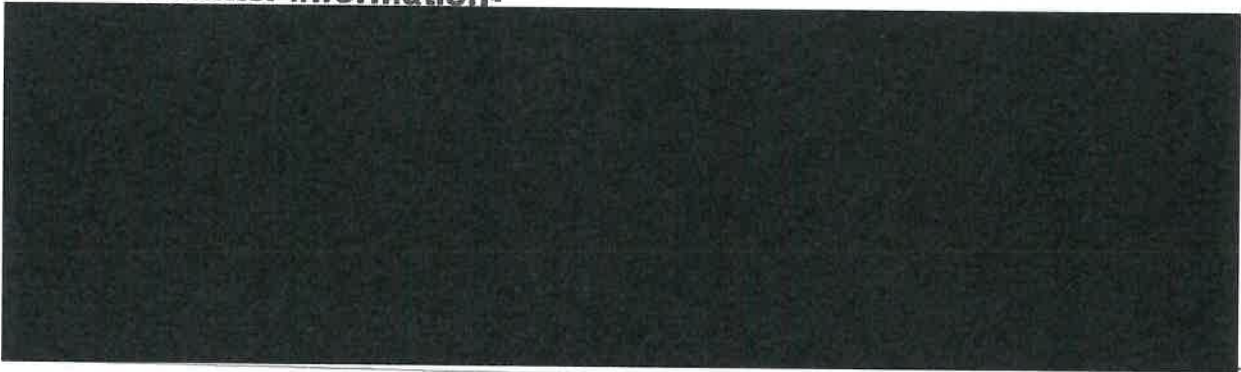
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutra / **Oppose** this Application.

E. Hearing Request

I (circle one): **Do** / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The application in its entirety

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118

My submission is:

I oppose this submission because it is in opposition to the aims, objectives and policies of:

1. The National Parks Act 1980
2. The New Zealand Conservation Authority General Policy for National Parks April 2005
3. The Fiordland National Park Management Plan 2007
4. The Te Wahi Pounamu Southwest New Zealand World Heritage Area declaration

With reference to National Parks in the **National Parks Act 1980**, Part 1 /4 (2) (a), I quote:

"They shall (my underline to emphasize management actions ascribed to 'shall' in the New Zealand Conservation Authority General Policy for National Parks April 2005 P14) be preserved as far as possible in their natural state"

The Path New Zealand application does not satisfy this principle. It is in opposition to it. A private commercial development is proposed for a site in its natural state. The development will have adverse effects on the natural state of Fiordland National Park. The development is not a necessity. It is a proposal for private commercial gain that could be located outside Fiordland National Park.

With reference to the **New Zealand Conservation Authority General Policy for National Parks April 2005**

I quote from P9:

"National parks are held for their intrinsic worth – that is for the value that they have, just because they exist – quite separate from any value that humans may ascribe to them. They are places where human interference, modification and control should be minimal, and enjoyment of them should be on nature's terms."

In my opinion the Path New Zealand application does not satisfy this purpose. It is in opposition to it. It is in a place that will be modified in more than a minimal way. A pristine natural landscape would be forever modified by the presence of a private commercial development complex and associated activities. The development complex is dependent on intensive daily importation of resources from outside Fiordland National Park. The complex itself will have adverse effects on park users, as will as activities based from it and imported support services to it.

Under Policies, 4.1 Indigenous species, habitats and ecosystems 4.1(b) P22:

"Indigenous species, habitats and ecosystems within a national park should be managed to (iv) maintain indigenous character (my underline for emphasis) and avoid adverse effects on habitats and ecosystems"

In my opinion the Path New Zealand application does not satisfy this policy. It is in opposition to it. It fundamentally changes a site of natural indigenous character to one with an obvious presence of human commercial character.

Under Policies, 4.5 Geological, landform and soil features 4.5(b) P27:

"Activities which diminish the quality of scenic, geological (including geothermal), soil and landform features and other abiotic diversity within national parks should be avoided."

Given that national parks are legislated to be preserved as far as possible in their natural state, the scenic values of the chosen site are severely compromised by the visible presence of a private commercial development complex. In my view the Path New Zealand application contravenes this policy.

118

118

Under Section 8. Benefit, Use and Enjoyment of the Public P37:

"People can also have an adverse impact on the very qualities which attract them to national parks in the first place. In addition the enjoyment of some can be at the expense of the enjoyment of others. A range of activities and behaviours, facilities and services, and large groups, can erode enjoyment of national parks in their natural state and as places of refuge from commercialism and urbanisation."

The idea of national parks as refuges from commercialism and urbanisation is central to my relationship with national parks. It is sufficiently strong that I regard it as part of my identity as a New Zealander. I have travelled within New Zealand and overseas and have seen how natural landscapes are so easily corrupted, degraded and damaged by the presence (and this presence does not have to be visually obvious) of commercial activities. The Path New Zealand application, by virtue of its mere presence as a private commercial development complex in the Eglinton valley, and with its adverse visual and audible effects on the natural state of Fiordland National Park, is contrary to my view of what a New Zealand National Park is about - a place where nature is preserved in its natural state, where we can escape from commercial forces.

I disagree with the statements made in the application Form 3b:

"Strong amenity value but minimal impact on other users" P14, and

"The only users that might see the buildings would be fishers within the vicinity of the site" P16

The site is the last remaining unmodified (introduced species excepted, which could be remedied in future) grassland flat in the Eglinton Valley. Users other than fishers may be attracted to it for expressly that reason. It should not be privatised. I can imagine in future a walking trail that connects up the grassland flats of the Eglinton Valley. The flats could be restored with native vegetation, and endangered indigenous fauna reintroduced. Even if I do not visit the site, I derive pleasure from knowing that it is an undisturbed natural site in a Front Country zone, not a place of commercialism. It is doubly important in my opinion to protect unmodified natural sites in Front Country zones, as they are the national park sites which are most accessible to visitors and locals alike. These national park users value accessible natural sites highly - they visit national parks for this very reason, not to view private commercial car parks, private roads and private commercial buildings.

The presence of this private commercial accommodation complex will be betrayed by the approach signage, cleared mature beech forest, vehicle park, access road, smoke, fumes and noise emanating from the fireplace and diesel generator. These indicators send the message to visitors that this is a place of human colonization, rather than the natural wilderness they expect.

The above adverse effect in this Front Country area will also have an adverse effect for the Eastern Remote Area setting as the Dore Pass walking route will be adversely affected by smoke, fumes, artificial light pollution and noise. This area setting is specifically identified in the Fiordland National Park Management Plan (P132) to be managed as an accessible alpine remote experience for tramping. The adverse effects noted, while having their source in a Front Country area, will adversely affect visitors to the Eastern Remote Setting area.

The drawings are indicative concepts. They do not include items material to evaluation of the development complex such as an approved highway intersection and vehicle park design, heavy vehicle hard stand area, private road design, diesel tankage and bund size and location, services infrastructure such as pipework, hellpad (if envisaged), building heights and security fencing.

There are no dimensioned section drawings of the development complex provided in the application. The drawings are an impression of a building in a natural scene only, and should not be relied on as the final actual appearance of any private development complex on the site. The perspective drawings for example do not show the cleared mature forest required for the highway junction, heavy vehicle turning and car parking, or the service buildings around the proposed private commercial accommodation buildings. I believe there will be another building visible from the highway that is not notified in the application, and that is a shelter building next to the parking area for newly arrived private clients. Rain and wind is frequent and heavy in this valley.

It is possible Path New Zealand could seek to provide covered parking for its private clientele, many of whom will

811

118

be unfamiliar and unprepared for the weather in this location. Covered parking, regardless of whether it is a building or a roofed structure, will prompt even more mature forest clearing and proliferation of private commercial structures within a national park setting. There is also a risk of tree fall from full size red beech trees between the highway and the private accommodation complex, which could only be mitigated by forest clearance or heavy roofed structures. All of these effects are adverse to the philosophy of national parks to enjoy nature in its natural state.

The current commercial accommodation at Knobs Flat accommodates 15 guests at full capacity. This, and the public bathroom facility on site, has a required substantial highway junction with slip roads, lane dividers, marked road road refuges, road widening and signage.

For comparison, the Path New Zealand commercial development complex accommodates 48 occupants including staff. Access from the highway by heavyweight slow moving service vehicles such as fuel tankers and sewerage trucks is necessary for the operational viability of the proposal. As such changes to the existing highway in order to make access to the proposed complex safe and compliant will be major, including substantial mature native rainforest clearing. It will be a new highway junction similar in scale and effect to the Knobs Flat highway junction. In my view this new highway junction will have an adverse effect on the enjoyment of this area by the 98% of visitors to the Eglinton Valley who would not use the Path New Zealand private development complex. That is because the envisaged highway widening, highway junction, Path New Zealand parking and heavy vehicle hard stand area and private access road will create a second Knobs Flat style commercial infrastructure complex in the Eglinton valley. This is a clear case of commercial proliferation within a national park, which is not in the interests of the majority of visitors.

Recent changes in the commercial lease arrangements at Knobs Flat make it likely that additional accommodation will be applied for at Knobs Flat. This has been signalled in local media. The current concession at Knobs Flat is already approved by DOC to be doubled in capacity from the existing provision for 15 guests to 30. This additional visitor load would at least be concentrated at an existing site of commercial accommodation. The Path New Zealand private accommodation complex would only increase this projected additional accommodation congestion in the Eglinton valley, with the adverse effect of adding it to a new site in a natural state.

The Path New Zealand private commercial development complex includes access from SH94 to the accommodation area by what is described in the application document as a track, scaled for a quad bike. I consider this is a false description of what in reality is a private road of half a kilometre in length. A facility for 48 overnight occupants will require daily access for emergency services, laundry supply truck, food delivery truck, gas cylinder delivery truck, firewood truck, sewerage truck, covered luggage trailer, drink deliveries, diesel and petrol fuel tankers, and utilities maintenance contractor vehicles. The idea of this frequency and volume of people, materials and imported supplies being moved through a Fiordland rainforest on a daily basis by a quad bike seems to me to be an unlikely proposition. My understanding is that private motorized vehicles operating on private roads are not permitted by the Fiordland National Park Management Plan.

With reference to Policy 8.1c P39:

"Planning and management for recreation and other opportunities for the benefit, use and enjoyment of each national park should:

- i) preserve national park values, including natural quiet, as far as possible;*
- ii) minimise adverse effects, including cumulative effects, on national park values;*
- iii) provide for a range of experiences to enable people with different capabilities, skills and interests to have the opportunity to benefit, use, enjoy, and gain inspiration from national parks; and*
- iv) maintain the distinctive character of recreation in New Zealand national parks, including the traditional New Zealand backcountry experience with its ethos of self-reliance."*

The Path New Zealand application fails to comply with these points as follows:

- i) The Murcott Burn flat site is the only grassland flat in the Eglinton Valley where it is possible to escape from human infrastructure. The Path New Zealand private commercial complex will bring noise to

811

118

this last remaining natural clearing in the Eglinton Valley from service vehicles, helicopters, staff and client noise, and mechanical plant. It does not preserve natural quiet, it adds noise. The prevailing wind in the Eglinton Valley is from the north and west quarters. Noise from the Path New Zealand development will carry to low impact national park users who have come to enjoy natural quiet in the Eglinton Valley.

- ii) By building in a natural site without existing buildings, Path New Zealand is proliferating commercial values and structures in a national park setting
- iii) Being serviced accommodation with professional live-in staff, off site service deliveries and removals, and vehicular access this application works against the traditional New Zealand backcountry ethos of self-reliance, and therefore erodes this distinctive character of recreation in New Zealand National Parks

Given the applicant's high value target market, I believe there will be an expectation of Path New Zealand's clientele that they will be able to access the site by helicopter. Path New Zealand is likely to encourage this mode of arrival and departure because of the substantial commission profits it can accrue from helicopter companies, and for client convenience. The presence of helicopters operating regularly at low level within the Eglinton valley would detract from most visitors enjoyment of the place. Path New Zealand's application makes no mention of helicopter landings.

There is also the prospect that Path New Zealand's development could be used for day visitors who arrive by helicopter for the enjoyment of site amenities (both commercial and natural), thus increasing the commercial use of the site beyond that declared by the applicant. This possibility could also have adverse impacts such as additional aircraft noise and visitor load in the Eglinton valley.

The activities supported by Path New Zealand could also have an adverse impact on other national park users. The Path New Zealand private accommodation complex is in effect a luxury lodge for a wealthy clientele. Luxury lodges in New Zealand are well known for hosting weddings and corporate reward customers. The idea of going for a walk in an accessible peaceful national park setting, and being interrupted by fleets of Queenstown helicopters dropping off incentivized sales people for lunch at a private hospitality complex horrifies me. So does a party of noisy wedding guests in city attire who have no interaction with the natural setting other than to use it as a stage for their social pursuits. These scenarios are contrary to the idea of preserving and enjoying nature in its natural state.

With reference to Policy 9(d) P44:

"Any application for a concession or an authorisation to establish accommodation and related facilities in a place, or to extend or add to an existing structure or facility, should meet the following criteria:

- i) the accommodation or related facility cannot reasonably be located outside the national park; and*
- ii) it cannot reasonably be built elsewhere in the national park where the potential adverse effects would be significantly less; and*
- iii) the applicant cannot reasonably use or share an existing structure or facility"*

The Path New Zealand application fails to satisfy all three of these criteria. It should be rejected on these grounds alone. While some of these criteria may be challenging to achieve now, that does not mean that they could not be reasonably achieved in the future. In my view the Department of Conservation should work to a planning horizon for national parks that projects hundreds of years into the future – effectively, in perpetuity. What values would Fiordland National Park and the Department of Conservation express if a proposal of this type is approved once every twenty years for the next five hundred years, in contravention of national park values to avoid commercialism and development proliferation?

Note that Policy 9(d) does not provide any guarantee of commercial feasibility to commercial operators applying for concessions in national parks. Commercial activities by their nature entail assessment of risks. Path New Zealand has assessed that their clientele would not tolerate accommodation adjacent to budget accommodation. While that may be a commercial reality, the policy does not say that Path New Zealand should therefore be granted the social and economic license to benefit from an undeveloped site in a national park that would be privatized for Path New Zealand's exclusive benefit.

The Path New Zealand application can absolutely be located outside of Fiordland National Park. The policy does not state "enable development within a national park where an applicant claims to have no viable alternative site

8/1

118

outside a national park". Considering the number of comparable private accommodation facilities in the lower South Island that have been operating successfully for long periods, e.g. Takaro Lodge, Fiordland Lodge, Minaret Station Alpine Lodge, and comparable accommodation ventures being proposed and built with regularity, Path New Zealand's claim that no site is commercially feasible outside Fiordland National Park is false.

The application Form 3b P20 states:

"Currently the closest accommodation to the site that is outside the National Park is at Te Anau Downs. It is budget accommodation catering to backpackers... Given the target market, it would also not be possible to locate a high-value experience beside budget accommodation."

In my view this is a weak argument. The existing Te Anau Downs site could be transformed from budget accommodation to high-value accommodation easily, and without adverse effects on Fiordland National Park. There is an abundance of land in the lower South Island outside of national parks that is suitable for high-value visitor experiences. In my opinion this section of the application fails as an argument or a defence for its inclusion within Fiordland National Park.

With reference to Policy 9(e) P45:

"All accommodation and related facilities, including replacements, additions and extensions and signage, in national parks should (unless otherwise provided for in an existing lease):

- i) be consistent with the outcomes planned for places;*
- ii) minimise adverse effects on national park values and on the existing benefit, use and enjoyment of the public, including public access;*
- iii) avoid proliferation of the built environment;*
- iv) complement existing accommodation and related facilities;*
- v) be located, designed, constructed and maintained to:*
 - a) preserve a sense of naturalness;*
 - b) where possible, be close to other buildings;"*

The Path New Zealand application fails to comply with all of these points because:

- i) The place is planned for protection in its natural state
- ii) Being the only remaining undeveloped grassland flat in the Eglinton Valley, development of it for private commercial accommodation has an adverse effect on public use and enjoyment
- iii) It is a clear proliferation of the built environment in an unmodified national park setting (invasive vegetation excepted)
- iv) It does not complement existing accommodation by virtue of adjacency, it is new accommodation on a new natural site
- v) It is a private commercial intervention on a natural site, and it is not close to other buildings
- vi) Signage will be required for road safety and information, this will have an adverse effect on the natural scenic values of the Eglinton valley as seen by users of the SH94 Milford Sound Highway. For an indication of the scale of signage required reference should be made to the existing NZTA signage on the southern and northern approaches to Knobs Flat. These are large signs that will newly commercialize a natural site enjoyed by over 700,000 visitors a year for its scenic values. This is wrong because it does not comply with the policy

The application Form 3b P17 states:

"Given the preferences of this target market, it would not be possible to develop a commercially feasible, high-value product if Path's site was situated within close proximity to campsites and budget accommodation. As a result, Path cannot reasonably share a site with existing operators".

In my view this is a weak argument, and I disagree with it. The ethos of New Zealand national park management is not about enabling commercial feasibility. There are plentiful other sites in the lower South Island outside Fiordland National Park that Path New Zealand could use for this purpose, and that is what the policy documents

811

118

say should be done. I also disagree with Path New Zealand's contention on the same page that the location of the site avoids proliferation of the built environment. That is a nonsense, this is a natural greenfields site which will be irreversibly changed with parking, buildings, infrastructure, roading and vehicles.

In my opinion the application will add congestion to the SH94 Milford Sound Highway by causing bottlenecks to traffic at the parking area, and additional service vehicles and therefore presence of commercialism (food supply vehicles, alcohol supply vehicles, laundry service vehicles, diesel fuel supply vehicles, solid wood fuel supply vehicles, gas supply vehicles, fire safety testing vehicles, tourism service provider vehicles, maintenance vehicles). The proximity to walking tracks will have no congestion relieving effects because:

1. The target market will want to enjoy the catered facilities they are paying for in the morning and evening, so they will arrive at trail heads at the same time as other park visitors
2. The Eglinton Valley is already congested with hundreds of campers every night in summer, so the Path proposal is only adding more visitors to this existing load

If Path New Zealand's private development were to be approved, the operations of this facility, assuming full occupancy, would add 14,600 visitors to this area of the Eglinton valley annually. With visitor numbers to Milford Sound projected to increase to 1,000,000 in future, the stress on the Eglinton valley from increased visitor numbers is only going to worsen. Privatizing the last undeveloped grassland location in the Eglinton Valley for the exclusive use of less than 2% of the visitors to the area is wrong.

With reference to the **Fiordland National Park Management Plan 2007**

I quote from Part Five Visitor Management, P98:

"Although Fiordland National Park contains a vast visitor resource, it is not essential nor indeed desirable to provide for every visitor taste or preference. Outside Fiordland National Park many opportunities are available, or potential exists for them, particularly on other conservation lands in the southern part of New Zealand."

I believe that where there is a conflict between preservation of natural state and commercial development in a national park, as there is in this application, the Department of Conservation must always make decisions guided by preservation, because that is what is legislated for national parks. There is an abundance of sites in the lower South Island outside of Fiordland National Park where Path New Zealand could provide their clientele with visitor accommodation in a river valley with forest and mountain views.

Further, it is also stated on P98:

"Fiordland has its own special attributes, including large tracts of wilderness and remote country. Maintaining these wilderness/remote values should be accorded priority in the visitor management of Fiordland National Park."

Related to this statement, refer P100:

"The distance from large urban centres supports the perception of wilderness and remoteness that provides a distinct draw card and 'pull' factor to those who do visit Fiordland National Park and has increasingly been identified by visitors as one of Fiordland's main attractions"

The Eglinton valley is an accessible front country location within Fiordland National Park. The over 700,000 visitors annually who visit it expect to sense values of wilderness and remoteness. This feeling is generated by engagement with nature in its natural state. These visitors do not come to the Eglinton Valley to view commercial accommodation buildings, car parks, cars, private roads, signage, artificial lighting, associated service vehicles and possible aircraft movements. Path New Zealand's proposal will add all of these things to a valley which in my opinion is already struggling to cope with the adverse impacts of visitors.

A substantial number of visitors, measured in hundreds, to Fiordland National Park travel early in the morning

811

118

from Queenstown and the Te Anau basin along SH94 Milford Sound Highway. They are variously trying to beat the crowds, enjoy beautiful dawn light or rendezvous with the earliest Milford Sound boat cruises. The first obvious roadside engagement with Fiordland National Park is the park boundary and sign at the mouth of the Eglinton valley. The change of landscape from modified farmland to beech forest, grassland river valley and mountain range natural landscapes is noteworthy. The sense of entering and discovering this landscape as a natural place is palpable and evokes feelings of wonder and appreciation for the beauty of nature in its natural state. The sense of discovery continues all the way along the Eglinton valley as features of natural beauty are revealed – clearings, waterways, ponds, topography changes, vegetation changes and lakes. It is unquestionably magnificent. I am absolutely against this natural scenography being interrupted by the unavoidable indicators of private commercial accommodation - overnight car parking, signage, service vehicles, staff vehicles, private roads, smoke, smell and artificial lighting. International and local visitors do not travel long distances to see these private commercial intrusions in Fiordland National Park.

The only substantial fixed off road infrastructure interrupting this sequence are the buildings at Knobs Flat, some of which perform an important public service (toilets, waste disposal, interpretation and conservation programmes), and DOC campsites. The commercial accommodation at Knobs Flat has historical origins as a public works encampment. If any accommodation is to be developed, it should only be at an existing site such as Knobs Flat, not a new 'greenfields' site in the Eglinton valley.

From Part 5.3.9.2 Milford Road P172 I quote:

"There are a number of matters that can affect the Milford Road offering a world class visitor experience. Some of these include: ...Inappropriate developments alongside the road that detract and or are inconsistent with the natural characteristics and values of the surrounding natural park;"

I contend that Path New Zealand's proposed rainforest clearing, private road, car parking, signage, artificial lighting, diesel exhaust smoke, engine noise, client noise, fireplace smoke, diesel tankage and visitor accommodation building are inappropriate developments that detract and are inconsistent with the natural characteristics and values of the surrounding national park. They are adverse effects that detract from the experience of nature in its natural state.

I disagree with the application statement Form 3b P11:

"On the main road, adjacent to the site, there is an area where a number of trees have fallen down or have been felled to maintain the road. It is proposed that the car park be located there as it is unlikely to have a significant impact."

Path New Zealand's proposed client car park is compared in the application to the existing car park on the Lower Hollyford Road opposite the Lake Marian track head. This car park was constructed in the last two years and is a source of sadness to me every time I pass by it. I feel that national park values were desecrated by the removal of indigenous vegetation for vehicle parking. Both the vehicles themselves are an intrusion, and in the low season the large area of visible hard surface is equally detrimental to national park values. I consider the addition of a thirty vehicle car park with turning areas for buses, trailers, camper vans, fuel tankers, food and laundry service vehicles to be an adverse effect. Traffic in the vicinity lacks local experience, moves at high speed, and is in close proximity during daily peak periods. The Eglinton valley is well known locally for the regularity of road accidents with critical consequences. The Path New Zealand highway junction, private road, vehicle parking and heavy vehicle hard stand areas have not been professionally designed or critiqued by a traffic engineer. I believe it is unlikely to take the form shown in the application for safety reasons, which will require the addition of substantial slip roading, refuges and mature native rainforest clearance to make it safe. These will all have adverse effects in terms of preserving the valley in its natural state for visitor enjoyment. Part 5.7 Rooding, Vehicle Use and other Transport Options (Other Than Aircraft and Boating) P245 requires that all planned roading developments within Fiordland National Park will require an assessment of environmental effects. The proposed Path New Zealand car parking area is likely to trigger a new highway junction and private road development, however no assessment of environmental effects or traffic plan has been submitted for scrutiny. I believe the vehicle park and associated roading design will adversely affect natural and landscape values, and especially in an accumulative effect in the context of the Eglinton valley front country setting within Fiordland

811

118

National Park.

From Part 5.5.9.2 Milford Road Objectives P173 I quote:

**1. The Fiordland National Park that adjoins the Milford Road will be managed to provide for and protect the following attributes:*

- a) The spectacular views of forested catchments, open grasslands, lake systems and outstanding mountainscapes;...*
 - d) The Eglinton Valley's open and uninterrupted views of the surrounding mountains and valleys and its overall sense of naturalness...*
- 5. To consider opportunities for facility development which will enhance public enjoyment of Fiordland National Park, and appreciation of the natural values without impairing or diminishing its natural values*

In my opinion the Path New Zealand application fails to satisfy these criteria. It is a private commercial accommodation complex in a natural area. It will detract from the natural attributes referred to above which are referenced in the Management Plan for protection.

I consider this to be especially important in the Eglinton valley because it is the only drive in sealed road access to all of Fiordland National Park. That makes it the most road accessible valley in all of Fiordland National Park, and it receives by far the majority of visitors, both local and distant, of any valley in Fiordland National Park. These visitors, local, national, and international in source, visit the valley and derive enjoyment from the valley in its natural state.

There are seven primary grassland clearings in the Eglinton valley, as identified in the attached annotated aerial photograph. They are:

1. Walker Creek Flat
2. Eglinton Flat
3. Deer Flat
4. Knobs Flat
5. Murcott Burn Flat (site of Path New Zealand application)
6. Upper Eglinton Flat
7. Cascade Creek Flat

The grassland clearings are the most accessible natural habitat in the Eglinton Valley for visitors. The Murcott Burn Flat is the only clearing in the Eglinton Valley that remains unmodified by human infrastructure and presence. 85% of the grassland clearings in the Eglinton Valley are modified with human infrastructure and presence, as listed below. With the objective of the National Parks Act to maintain and preserve nature in its natural state, the Path New Zealand proposal will render all of the grassland clearings in the Eglinton Valley as modified, and the last one remaining in its natural state privatized. The most accessible and most visited valley in Fiordland National Park should not have all of its clear spaces modified by human infrastructure. This would be the antithesis of "nature on nature's terms."

List of existing human infrastructure and presence in the Eglinton valley:

1. Walker Creek Flat - camping area, car park, driveway, camper vans and rental cars at Walker Creek; camping area, car park, driveway, camper vans and rental cars at Mackay Creek
2. Eglinton Flat - coaches, camper vans, rental cars, 100+ people at peak periods, SH94 highway bridge over Eglinton River East Branch, accessible walkways and hundreds of people at Mirror Lakes, idling coaches
3. Deer Flat - camping areas x 3, driveway, camper vans and rental cars
4. Knobs Flat - accommodation, service buildings, car and coach park, gravel roads x 2, gravel pit, Kiosk Creek camping area, driveway, camper vans, rental cars, Smithys Creek camping area, driveway, camper vans, rental cars
5. Murcott Burn Flat - nil
6. Upper Eglinton Flat - car park, camper vans, rental cars, camping area
7. Cascade Creek Flat - road, multiple car parks, camping areas for hundreds of visitors, toilet blocks,

811

118

shelters, Cascade Creek road bridge, gravel pit, Eglinton River road bridge

From Part 5.3.9.2 Milford Road Objectives P176 I quote:

"13. Activities associated with commercial recreation or tourism proposals, including new facilities, should only (my underline for emphasis) be authorized where:

a) They are consistent with the attributes identified in Objective 1 of this section (ensure the preservation [my emphasis] of Fiordland National Park's natural characteristics, including the iconic status of Fiordland National Park, values and historical features while meeting the needs and aspirations of visitors)...

- e) New proposals for travellers' accommodation should be considered in accordance with Chapter 9 of the General Policy for National Parks 2005, however in general it is considered that there is adequate travellers' accommodation provided within Fiordland National Park and at nearby locations; and*
- f) Preference should be given to any facility development that utilizes previously modified sites and provides new opportunities for Fiordland National Park visitors, but is still in keeping with the national park setting."*

The Path New Zealand application fails to satisfy both of these criteria. While the demand for accommodation within Fiordland National Park may exceed supply, it does not follow that existing accommodation within Fiordland National Park is inadequate. Indeed if supply were to meet demand I argue that national park values would be adversely and intolerably affected. Alternative existing accommodation is available within 45 minutes drive of the central Eglinton valley at Te Anau, and there is scope for unique visitor accommodation close to both Te Anau and the Fiordland National Park boundary, and a plethora of sites in the lower South Island that the applicant has dismissed or overlooked.

With reference to the Te Wahi Pounamu South West New Zealand World Heritage Area

The Department of Conservation is obliged to manage this area in such a way that its wilderness integrity is preserved. The objective to maintain wilderness integrity and protect the values of the Te Wahi Pounamu South West New Zealand World Heritage Area enjoyed by hundreds of thousands of front country visitors from around the world would be seriously eroded by the obvious commercial presence of the Path New Zealand private commercial accommodation complex.

Summary

Irrespective of scale, massing, design quality and any other 'mitigating features' presented by the applicant, the application is a commercial presence in a natural place that is afforded protection from such interventions by the statutes, policies and plans noted at the beginning of this submission. It is fundamentally non-compliant.

I am concerned that if this application is approved by the Department of Conservation it will set a dangerous precedent that is antithetical to the purpose of New Zealand's national parks. Namely that the places we are responsible for affording the greatest protection are for sale to commercial interests. This should never be allowed to happen.

While there are existing sites of commercial accommodation within Fiordland National Park, these have historical origins as a government tourist hotel, public workers camps or community trust facilities. I am not in favour of additional private commercial accommodation facilities within Fiordland National Park due to their denigration of natural values and non engagement of 'nature on nature's terms' that is implicit to New Zealand national parks.

I finish this submission with a quotation from Kerry Marshall, then Chairperson New Zealand Conservation Authority, 4 May 2005 in his foreword to the New Zealand Conservation Authority General Policy for National Parks April 2005:

"The bottom line, of course, is that national parks are preserved and maintained in perpetuity. We must be ever vigilant to ensure that this basic tenet is not massaged or eroded".

911

118

'Preserved and maintained' has a very different meaning to 'developed for private commercial interests'.

Nowhere in the policies and plans for Fiordland National Park does it say:

"Enable commercial feasibility of private commercial accommodation development complexes on natural front country sites within Fiordland National Park because the developer is unable to conceive a similar proposal for a site outside Fiordland National Park."

Yet this seems to be the approval the developer is seeking.

The Path New Zealand application:

1. Does not comply with the National Parks Act 1980 to preserve Fiordland National Park in its natural state
2. Is not located at an existing site of commercial accommodation within Fiordland National Park
3. Could be achieved elsewhere in the lower South Island outside of Fiordland National Park
4. Imposes adverse effects on national park users who value national parks as a refuge from commercialism

Therefore the application should be rejected in full.

811

118

What outcomes would you like to address with your submission?:

The outcome I expect is for the Department of Conservation to implement the intent of the relevant statutes, policies and management documents, which is to reject this application in full due to non-compliance with the guidance contained in those documents. Specifically, do not allow new commercial accommodation structures in national parks where:

1. They conflict with national park values
 2. They are not sited with existing accommodation infrastructure
 3. They could be accommodated elsewhere outside the national park
 4. They impose adverse effects on national park users who value national parks as a refuge from commercialism
- This proposal conflicts with national park values
 - This proposal is sited on the last remaining unmodified grassland site in the most heavily visited valley in Fiordland
 - This proposal is not sited with existing commercial visitor accommodation
 - This proposal could be located outside Fiordland National Park.

G. Your Signature



20 July 2018

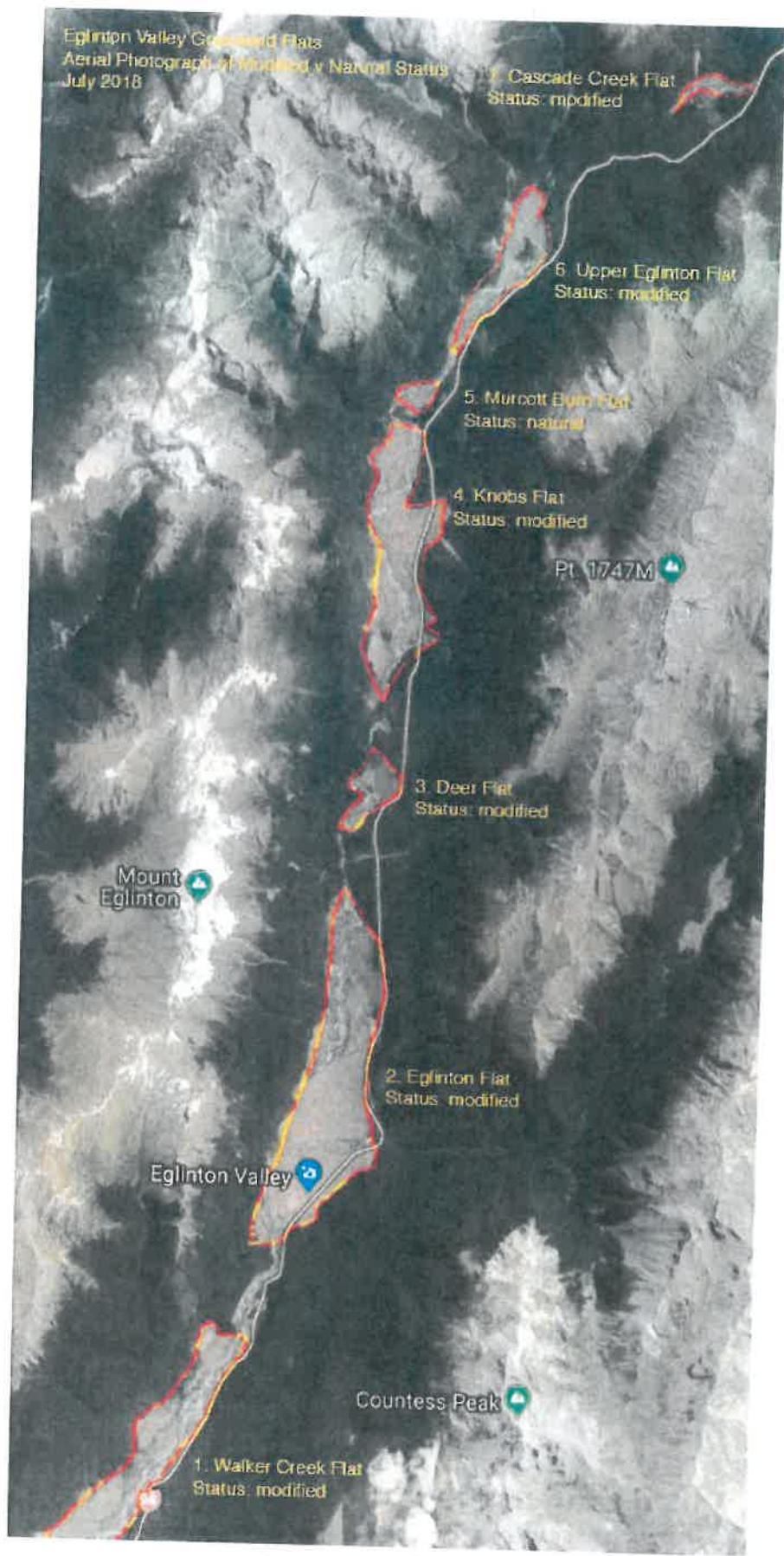
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

118

118

Eglinton Valley Grassland Flats
Aerial Photograph of Modified v Natural Status
July 2018



811



**Note: Include pages two and three of this form with your response to DŪC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) **Support** / **Neutral** / **Oppose** this Application.

E. Hearing Request

I (circle one):-**Do** / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

I strongly support the entire application by Path New Zealand Limited for the reasons outlined below.

My submission is [include the reasons for your views]:

Path New Zealand Limited have prepared a detailed application for a Concession to Lease Land. I support their vision that the lodge has been designed (and will be constructed) in a manner which treads lightly on the Fiordland National Park, and by doing this they have ensured that sustainability is at the very heart of the development. The application aligns with the objectives and policies of the Fiordland National Park Management



119

Plan (FNPMP), June 2007, and is compatible with current uses and users of the park. The application will not result in any adverse effects on the natural, historical and cultural, recreational, landscape and amenity values of Fiordland National Park

Path began with a concept of providing alternative accommodation within the park and have chosen a site that meets its objectives of providing guests with views of outstanding natural value while the location has been chosen to avoid and/or minimise effects on environment, including managing ecological and freshwater effects.

I recognise and appreciate the manner that Path has developed their application to draw on existing DOC protocols and in doing so Path has accepted that the development will follow all relevant DOC protocols.

As outline in the Sunday Star article on the 8th July 'Taking a hike: Why walking tourism is such a big deal' almost 3/4 of tourists from and within New Zealand go walking at some stage on this holiday. Path offers an alternative to the DOC huts, and therefore in offering this alternative more people will engage with our National Parks and come to appreciate it. This aligns with a goal of the FNPMP which is to increase the appreciation of our natural environment and the value of conservation.

Path's request for a 5 year rolling renewal of the 30-year term based on consultation with DOC and Ngai Tahu is a strong reflection on their vision to be industry leaders in sustainable tourism. By Path encouraging this conditions to be placed on their application Path throughout its operation will be able to evolve their practices, as and when sustainable technology evolves (especially in waste management) and will be able to implement any changes to conversation as our understanding of effects on conservation changes.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Grant the concession to lease land to build and operate a commercial structure in Fiordland National Park for sought by Path New Zealand Limited.

G. Your Signature



20/7/18

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor

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119



Note: Include pages two and three of this form with your response to DOC.
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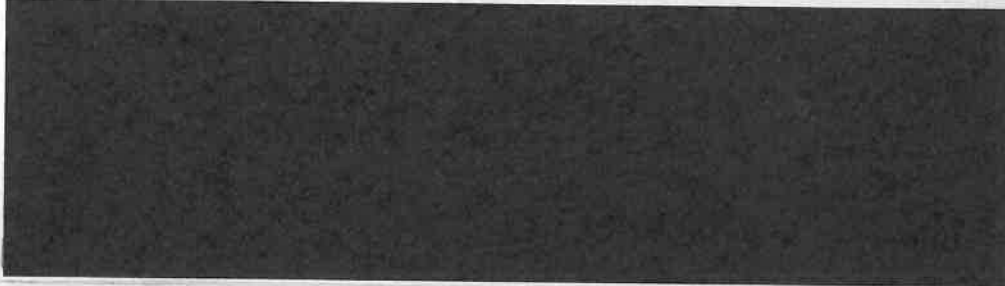
A. Permission Application Number and Name of Applicant

64177-AOC - Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

THE WHOLE SUBMISSION

051

120

My submission is (include the reasons for your views)

- ① IT IS A NATIONAL ~~BIK~~ PARK
- ② WE ALREADY HAVE ACCOMMODATION AT KOOBS FURT
- ③ THERE IS ALREADY PLenty OF TRANSPORT TO KOOBS WORKERS TO AND FROM KOOBS FURT ONLY

What outcomes would you like to address with your submission? (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought):

THE WHOLE SUBMISSION REJECTED

G. Your Signature



20/7/18
Date

Please complete this form and send to DNSubmissions@dca.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

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120



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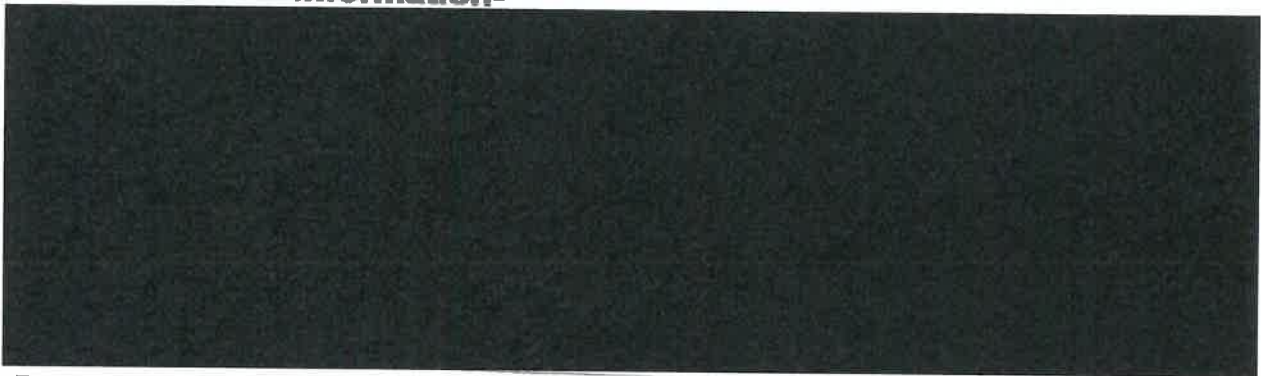
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

1. My firm belief that further accommodation for private economic gain has no role in our National Parks and a World Heritage Area.
2. Development history in the valley – comments regarding this
3. Impact of carpark and access track.
4. Grey water seepage.

151

121

My submission is [include the reasons for your views]:

Having read through the proposal I do think there has been consideration given to mitigating the effects on the environment. However, I strongly oppose further private accommodation being built anywhere within the public conservation estate.

The Eglington Valley is a very special place and should be protected from further development. The application states that the valley has 'already been subject to extensive modification.' Yes, there has been some development. However in reality this has been limited to a road, a camping area, and old Ministry of Works at Knobs Flat. The fact that the valley was grazed is entirely reversible over time. To this end DOC is controlling introduced weeds that came in with stock. Regardless of past development, the valley is within a National Park and a World Heritage Area and therefore needs protection as well as right of access to all without people feeling they are intruding on a privately-owned space. The valley needs to be left in its natural state as much as possible, without more development.

I resent the implication that this proposed development is similar to DOC and NZAC huts. It is not. Both are part of our history; part of our outdoor ethos and culture. This is simply an economic proposal.

The proposed carpark is of concern to me. Comparing it to the carpark for Lake Marian doesn't help. I find that increased carpark a necessary blight on the landscape with environmental impacts similar to the increased carparking at White Horse Hill at Aoraki Mount Cook. This proposal indicates that the preferred site for the carpark is in an area of fallen trees. I argue that fallen trees are part of a regenerating forest. I agree with the proposal that a longer access track is also not desirable. Any access track would result in far more impact on the forest than is acceptable in a National Park and World Heritage Area.

I am also concerned about the seepage system for disposal of grey water into the area for the proposed nature walk. Quite simply, Fiordland National Park doesn't need that grey water. It doesn't need this development.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I strongly suggest that the developer considers building the proposed accommodation outside of Fiordland

151

121

National Park.

G. Your Signature



Date 20/07/18

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(121)

151



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

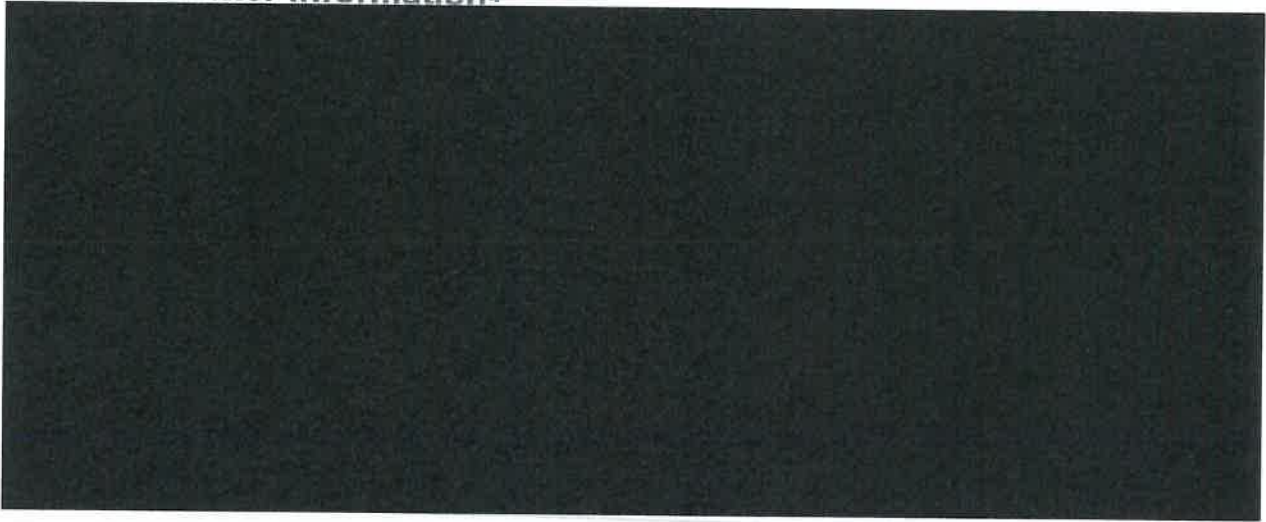
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

I Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

Path New Zealand Limited is applying for a concession to lease land to build and operate a commercial structure in Fiordland National Park.

My submission is [include the reasons for your views]:

I am opposed to this application by Path NZ LTD as per the points below

- It goes against the current Fiordland National Park Management Plan where it is said :

5. Structures, facilities and services (e.g. huts and tracks) ancillary to commercial recreation/tourism activities will only be considered where it can be demonstrated that they cannot be undertaken outside Fiordland National Park or the use of existing Fiordland National Park facilities is not possible.

Also

- Private huts are inappropriate in national parks as they capture precious public land for exclusive private benefit and are not consistent with the National Parks Act 1980

Once you open the park up to commercial operations such as this proposal then you open it up to all major commercial operations to follow suit. It will have no general public benefit and will destroy what I believe the majority of New Zealand people are trying so hard to fight for. As quoted from the DOC website.

Quote "The New Zealand national parks system aims to preserve in perpetuity for their intrinsic worth and for the benefit use and enjoyment of the public those parts of the country that "contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest".

As a fisher person the above statement truly reflects my own sentiments & feelings towards the Eglinton River and the stunning Eglinton Valley. Backcountry fisheries such as the Eglinton River fishery are limited in number and highly valued by anglers and are particularly sensitive to major developments.

I think allowing this application to proceed would set a dangerous precedent for over commercialization in the precious Fiordland National Park

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

To dismiss this application by Path NZ Ltd and deem it unattainable to Path NZ Ltd

G. Your Signature



20/07/2018

Date

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122

SSI



**Note: Include pages two and three of this form with your response to DOC.
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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): Do / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

- Accommodation facilities (includes staff accommodation) and associated services
- A car park
- An access track
- A nature trail

ESI

123

My submission is [include the reasons for your views]:

This commercially driven proposal has no place in a national park and if commercially viable should be established on private property. The national park should not be carved up for personal gain. If anything it should be expanded rather than reduced and certainly not effectively "gifted" to a commercial enterprise.

My reason for this view is that this development would spoil the experience of other park users and would also make the approval of other similar developments in the vicinity easier in the future once this lodge was established.

There is also the possibility of other park users feeling they are somehow trespassing when near this facility.

There is no merit in risking contamination of the park with the waste disposal associated with an accommodation facility e.g. grey water / black water disposal, domestic waste etc., fuel storage.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I would like this proposal declined in its entirety – no lease, no lodge

G. Your Signature



20th July 2018 _____

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

ES1

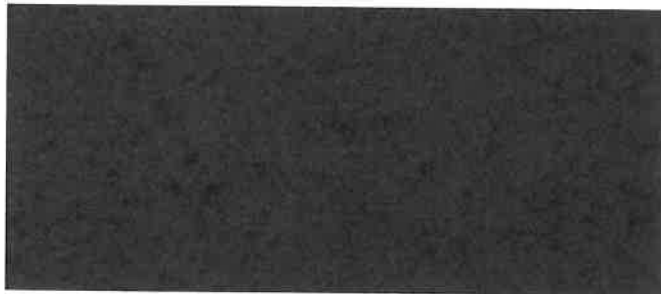
123

Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park



We oppose the granting of this concession.

The proposal to construct private accommodation within the Fiordland National Park does not satisfy Section 4 of the National Parks Act which states that: Parks to be maintained in natural state, and public to have right of entry.

It is also against General Policy for National Parks 9g which states that new accommodation in National Parks exclusively for private use should not be allowed.

GPNP 9d also states that any accommodation should preferably be placed outside the Park. The whole of this area is part of Te Wāhipounamu - South West New Zealand World Heritage Area, all of it is a stunning landscape which holds great attraction for tourists. There would be plenty of other areas outside of the Park, which would be suitable for the proposed accommodation.

This proposal is also contrary to the objectives within the Fjordland National Park Management Plan for the areas that adjoin the Milford Road.

This proposal, if granted, would be privatisation of part of the National Park. We strongly object to this – all of National Parks should be open to the public, parts should not be restricted to a paying few. There is ample opportunity for this type of tourist venture in an area that is not National Park, do not let this kind of proposal deride from the importance of National Parks as a public asset.

We want DOC to DECLINE this application



20 Jul 2018

124

51



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Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I oppose this Application.

E. Hearing Request

I do wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The entire application.

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125

My submission is [include the reasons for your views]:

See attached document, which forms part of this submission.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I wish that the concession application to lease land within Fiordland National Park made by Path New Zealand Ltd is declined in its entirety.

G. Your Signature



19 July 2018

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

(25)

(25)

BEFORE THE MINISTER OF CONSERVATION

In the matter of The Conservation Act 1987

And

**In the matter of Concession Application 84177-ACC by
Path New Zealand Limited**

SUBMISSION BY [REDACTED]

INTRODUCTION

1. My name is [REDACTED]
2. I am strongly opposed to the application by Path New Zealand Ltd (the Applicant) to lease land within Fiordland National Park for its exclusive use to provide commercial tourist/traveller accommodation for up to 40 guests (+ ancillary staff accommodation).
3. I am a Planning Consultant based in Christchurch, I hold a Bachelor of Science (majoring in Plant and Microbial Science and Geography) from the University of Canterbury (1997) and a Master of Science (Resource Management) (Honours) from Lincoln University (1999). I have worked in the field of planning/resource management since 1999. I am a Ministry for the Environment accredited Hearings Commissioner.
4. I make this submission as an individual that has gained considerable enjoyment from the use of the public conservation lands of New Zealand rather than an expert. Notwithstanding, my professional background means I am familiar with assessing the environmental effects of development proposals, as well as analysis of various legislation and planning/policy documents. In my view the proposal made by the Applicant is contrary to the purpose of both the Conservation Act 1987 and the National Parks Act 1980; as well as the policy documents that give effect to this legislation, namely (in this instance):
 - The General Policy for National Parks 2005; and
 - The Fiordland National Park Management Plan 2007 (FNPMP).
5. The reasoning for my view that the proposal is contrary to the above legislation and policy is set out in the balance of my submission.

STATUTORY PROVISIONS

6. In my view the key statutory considerations in relation to this proposal relate to:

(152)

(125)

- Section 17SA of the Conservation Act 1987, which states that the Minister may return an application that lacks required information.
 - Section 17SB of the Conservation Act 1987, which provides Minister may decline application that is obviously inconsistent with the Act.
 - Section 17U of the Conservation Act 1987, which sets out the matters to be considered by the Minister, including as particularly relevant to this application:
 - (i) The Minister shall not grant an application for a concession if the proposed activity is contrary to the provisions of this Act or the purposes for which the land concerned is held (section 17U(3));
 - (ii) The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing structure or facility, where he or she is satisfied that the activity could reasonably be undertaken in another location that is outside the conservation area to which the application relates (section 17U(4));
 - (iii) No lease may be granted unless the applicant satisfies the Minister that exclusive possession is necessary for either the protection of public safety; or the protection of the physical security of the activity concerned; or the competent operation of the activity concerned (section 17U(6)); and
 - (iv) Nothing in this Act or any other Act requires the Minister to grant any concession if he or she considers that the grant of a concession is inappropriate in the circumstances of the particular application having regard to the matters set out in this section (section 17U(8)).
 - Section 17W of the Conservation Act 1987, which sets out the relationship between concessions and conservation management strategies and plans.
 - Section 6 of the Conservation Act 1987, which sets out the functions of the Department of Conservation.
 - Section 4 of the National Parks Act 1980, which sets out that Parks to be maintained in natural state, and public to have right of entry.
7. It is my submission that without exception, all of the key statutory provisions outlined above support the decline of this application. I address each of these in turn.

Return of Application - section 17SA of the Conservation Act 1987

8. Having reviewed the application made by Path New Zealand Ltd, I was struck by the lack of independent and robust assessment contained therein. This contrasts with my professional experience of the information requirements in relation to proposals for resource consent made under the Resource Management Act 1991.
9. The application was primarily authored by the sole Director of the applicant company, this is hardly independent technical assessment. There is only one instance where the application relies on any independent technical expert assessment, which relates to the

251

125

ecological effects of the proposal assessed by Professor Norton. I do not consider a project architect to be an independent technical expert, particularly as the application contains no expert assessment of the visual amenity and landscape character effects of the proposed buildings, ancillary activities and entrance tracks on the receiving environment (namely Fiordland National Park).

10. In my view there is a difficulty of any decision-making authority seeking to rely on biased assessments undertaken by an Applicant, as opposed to relying on a professional assessment by an independent technical expert.
11. Also lacking from the application is any independent expert assessment of the recreational impact on other users of Fiordland National Park, and in particular the impacts on users of the Dore Pass Route, which passes in close proximity to the proposed facility. Consultation with a handful of stakeholder groups is not sufficient, and not a recognised way to undertake such assessment.
12. Based on the lack of independent technical expertise, I consider that the application should have been returned under section 17SA of the Conservation Act 1987 and never progressed to this point in the process. Having frequently been a processing officer engaged by Council's on many large development projects, I can confidently state that should this level of assessment have been submitted in relation to a resource consent under the Resource Management Act 1991, then it would have been returned under the corresponding section in that Act (section 88A RMA1991).

'Obviously Inconsistent' - Section 17SB of the Conservation Act 1987

13. As will be expanded on later in my submission, the proposal by Path NZ Ltd is in my view contrary to the Conservation Act 1987 (namely sections 6, 17U, 17W) and the National Parks Act 1980 (section 4).
14. I note that I have used the term contrary above in its RMA context, that being the proposal is "*repugnant*" to the provisions referred to above, rather than the lesser threshold of "*obviously inconsistent*" as used in section 17SB of the Conservation Act.

Purpose for which the land concerned is held - section 17U(3) of the Conservation Act 1987

15. The application site is located within Fiordland National Park.
16. The National Parks Act 1980 determines the structure for the control and management of National Parks in New Zealand and determines the broad principles by which the parks are to be managed.
17. Section 4 of that Act states that national parks are to be maintained in their natural state, and that public shall have the right of entry. Section 4(2) declares that National Parks shall be administered and maintained under the provisions of the Act so:
 - (a) *they shall be preserved as far as possible in their natural state;*
 - (e) *subject to the provisions of this Act and to the imposition of such conditions and restrictions as may be necessary for the preservation of the native*

152

125

plants and animals or for the welfare in general of the parks, the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features.

18. In my view this proposal is contrary to both (a) and (e) of section 4(2) of the National Parks Act as set out above. The proposal clearly does not preserve the National Park in its natural state, the exclusive occupation sought also removes the freedom of entry and access by other parks users.
19. Further to the National Parks Act 1980, the Department of Conservation produced a 'General Policy for National Parks' (April 2005). I note that the words of Mr Kerry Marshall, who penned the Foreword to this document reflects my personal reasoning and motivation for preparing this submission:

The bottom line, of course, is that national parks are preserved and maintained in perpetuity. We must be ever vigilant to ensure that this basic tenet is not massaged or eroded.

20. Chapter 9 of this document deals specifically with 'Accommodation and Related Facilities', which clearly encompasses the activity proposed in this case. Policy 9(g) states:

New accommodation and related facilities, including encampments, for exclusive private use should not be permitted in national parks.

21. This brings me to one of the more questionable interpretations set out in the application document, where on page 26 of the application document that "*the concept Path is proposing would not a [sic.] private hut within the meaning of the [Fiordland National Park Management] Plan*". It is noted that the FNPMP does not define the term 'private hut', however, it does define the term 'private accommodation', as follows:

Place to live or lodge which is not available to the general public on an open basis (FNPMP, page 302).

22. The application states that the "*establishment of the facilities would be for public use, not private, albeit guests would have to pay to use the facilities. This would be no different from existing accommodation facilities within the National Park, including DOC huts, the New Zealand Alpine Club's Homer Hut and the accommodation for guided walkers on the Milford and Routeburn Tracks*".

23. I find the Applicant's assessment on this matter confused. On one hand the application states that the proposed accommodation facilities are not private huts, however, it then goes onto rely on the fact that there are other private huts within the National Park to justify the grant of the concession (namely Homer Hut). The key difference being that Homer Hut is provided for in the Management Plan, is owned by a non-profit organisation and costs only \$35 per night to stay for NZ Alpine Club non-members (source: <https://alpinedclub.org.nz/product/homer-hut/>).

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125

24. The FNPMP (Section 6.12) clearly states that *"no new private huts should be allowed to be constructed within the Fiordland National Park"* and that *"existing private huts owned by non-profit organisations which are open to the public may be authorised"*.
25. This proposal cannot be said to fit under either of these scenarios. To suggest that this is a public facility is in my view represents the sort of message or erosion of the fundamental principle behind the establishment of National Parks that Mr Marshall cautioned against back in 2005. In my view the proposal is not a public facility, it will be a privately owned facility being available to the public for tariff to facilitate private financial gain. On that basis it is difficult to make any meaningful comparison with Department of Conservation Huts or other 'private' huts provided by recreational (not for profit) groups such as Homer Hut. It is clear that the circumstance of each of these huts has a greater priority in terms of contribution to the purpose of the Conservation Act than that proposed.
26. It is clear to me (and I suggest to most other ordinary New Zealanders) that the plain and ordinary meaning of Chapter 9 of the General Policy for National Parks is that the proposed accommodation is not available to the public on an open basis and therefore should not be permitted in National Parks.
27. In summary, I consider that this proposal is contrary to the purpose for which the land is held and should not be granted pursuant to section 17U(3) of the Conservation Act 1987.

Alternative Locations - section 17U(4) of the Conservation Act 1987

28. Proposals of this type should appropriately be located outside of National Parks. Private development does not accord with the purpose or principles of the National Parks Act or the Conservation Act.
29. To allow this proposal will create a precedent for private accommodation providers to lodge concession applications for travellers accommodation along all tourist routes through National Parks across New Zealand. This precedent will be impossible for the Department of Conservation to manage/control and lead to an inevitable adverse impact on the integrity of the philosophy behind our National Parks. The attributes that attract developers to such areas will be destroyed in an ad hoc fashion one concession at a time. It will be the public and our tourism industry that will ultimately pay the costs for such mismanagement.
30. The Department of Conservation needs to draw a line in the sand and send a clear signal that such development has no place in our National Parks, and that any new visitor accommodation facilities within National Parks outside of existing development areas will be provided by the Department itself. It is clear to me on reading the provisions contained in the FNPMP that is the basic assumption of the Department. It is unfathomable that the Department would ever provide a visitor accommodation facility such as that proposed in a National Park. The FNPMP refers to its tracks, huts, campsites, and other visitor facilities, no mention is made of providing hotels for private gain.

157

125

31. Hotel travellers accommodation such as proposed should be located on private land outside National Parks.

Exclusive Possession - section 17U(6) of the Conservation Act 1987

32. In this instance the Applicant seeks exclusive possession so as to maintain a sense of exclusivity for their paying guests, thereby attracting a higher tariff and higher profits. It has absolutely nothing to do with the protection of public safety; or the protection of the physical security of the activity concerned; or the competent operation of the activity concerned.
33. The wording itself is such that it is clear that the Conservation Act anticipates various tourism activities being undertaken on the land or water. The key aspect being "activities" (such as walking, biking, helicopter landings etc), as opposed to the construction of significant permanent structures for accommodation purposes as is proposed here.
34. The provision of National Parks for all reflects the egalitarian values on which New Zealand was founded. The exclusive possession proposed runs counter to the purpose and principles of the National Parks Act and the Conservation Act.

Fiordland National Park Management Plan - Section 17W of the Conservation Act 1987

35. This document was published in June 2007 as part of the by the Southland Conservancy Conservation Management Planning Series.
36. Part Five provides the direction for visitor management. It discusses the impacts of various recreational and tourism activities and, most importantly, provides a framework for the future recreation management of Fiordland National Park using defined visitor settings. It also includes matters relating to how the Department of Conservation intends to manage its tracks, huts, campsites, and other facilities and provides direction on how concessions will be addressed.
37. As stated in the application, the application site is located within the 'Frontcountry Visitor Setting', as described in Section 5.3.9 of the FNPMP. The application (page 26) makes much of the fact that when discussing recreational opportunities in the frontcountry, the FNPMP states that "travellers' accommodation facilities may also be appropriate in these visitor settings...". However, what is not referenced is that the FNPMP is the second part of that sentence, which goes on to state "...although the preference would generally be to have new facilities located at already modified sites". In this case the application site is currently not modified by any other structures or activities. Furthermore, the application does not acknowledge that this introduction applies to all six frontcountry management areas, which includes those that already include significant visitor accommodation. The FNPMP states elsewhere (Section 1.2.3, page 22) that:

"Most tourist accommodation and servicing for the park is located in the towns of Te Anau and Manapouri just outside the Fiordland National Park boundary. Facilities at Milford Sound / Piopiotahi include accommodation for visitors and various staff, an aerodrome, and jetties for tourist launches and fishing fleet, with associated services.

125

125

38. In my view the intention of the FNPMP is that travellers accommodation facilities will be provided within the front country visitor setting where such activities already exist (modified sites). These are at Milford Sound, Te Anau Lakefront and Te Anau Downs. I do not consider that it is the intention of the FNPMP that private travellers accommodation facilities be provided along the Milford Road in unmodified settings.
39. The relevant Objectives for the Milford Road area are set out in Section 5.3.9.2 of the FNPMP, as follows:
1. *The Fiordland National Park that adjoins the Milford Road will be managed to provide for and protect the following attributes:*
 - a) *The spectacular views of forested catchments, open grasslands, lake systems and outstanding mountainscapes;*
 - b) *Its significant indigenous flora and fauna;*
 - c) *A place which is a destination in its own right;*
 - d) *The Eglinton Valley's open and uninterrupted views of the surrounding mountains and valleys and its overall sense of naturalness;*
 - e) *The steep, winding and narrow character that forms large parts of the adjoining road;*
 - f) *The easily accessible and safe visitor opportunities at designated sites;*
 - g) *The valuable access for many who are accessing remote parts of Fiordland National Park;*
 2. *To provide for the integrated management of the Milford Road and Fiordland National Park adjacent to the road in a way that ensures visitor safety, protection of park values and a high-quality visitor experience.*
 3. *To provide sufficient opportunities for a wide variety of recreational activities compatible with national park purposes.*
 4. *To consider opportunities for facility development which will enhance public enjoyment of Fiordland National Park, and appreciation of the natural values without impairing or diminishing its natural values.*
 5. *To promote future growth in visitor use of the Milford Road outside of existing daily peaks.*
40. In terms of the implementation of these objectives, the FNPMP sets out that:
13. *Activities associated with commercial recreation or tourism proposals, including new facilities, should only be authorised where:*
 - a) *They are consistent with the attributes identified in Objective 1 of this section;*
 - b) *They can be sited to minimise adverse effects on the natural and landscape values;*
 - c) *The design is sympathetic to the national park setting;*
 - d) *The visitor experience is not compromised through overcrowding and where other adverse effects can be managed.*
 - e) *New proposals for travellers' accommodation should be considered in accordance with Chapter 9 of the General Policy for National Parks 2005; however, in general it is considered that there is adequate travellers' accommodation provided within Fiordland National Park or at nearby locations; and*
 - f) *Preference should be given to any facility development that utilises previously modified sites and provides new opportunities for Fiordland*

152

125

*National Park visitors, but is still in keeping with the national park setting.
[Emphasis added]*

41. In my view the proposal fails to meet Objective 1 a) and d), and I note that the Applicant has not provided any independent expert assessment of such matters in their application in any case.
42. In terms of Objectives 3 and 4, this proposal does not enhance any recreational opportunities along the Milford Road. It merely provides exclusive high quality accommodation for 40 persons on public conservation land. Whilst the application makes much of the fact that guests will partake in the many day walks in the area, there is no compulsion and the fact remains that most will simply arrive by private passenger vehicle make the 200m walk to the accommodation facility eat, drink, sleep and then leave in their vehicle. It is this attribute that differentiates this proposal from the private huts on the Milford and Routeburn Great Walks; at least the guests of those huts have to undertake a decent days walk.
43. Whilst it is acknowledged that the proposed facility might contribute meeting Objective 5, in terms of growing visitor use outside peak times; in my view this should not come at the expense of the other attributes of the Eglinton Valley as described elsewhere in the policy framework.
44. In terms of travellers accommodation, it is of particular note that the FNPMP (Clause 13.e)) cross-references back to Chapter 9 of the General Policy of National Parks 2005. As assessed above, the proposal is contrary to that Policy and is inappropriate within a National Park. Furthermore, the FNPMP clearly states that there is sufficient travellers accommodation already provided for both within the National Park (modified sites) or at nearby locations.
45. It is clear when read and considered as a whole, the FNPMP is about providing visitor facilities to enable the enjoyment of the National Park. In terms of accommodation in this particular visitor setting, the FNPMP refers to facilities being provided for by way of huts and/or campsites along the Milford Road. Where visitors are after a different type of 'Hotel' accommodation, they have the options of Milford Sound, Te Anau or the other more boutique providers located outside the National Park boundary. In my view there is nothing in the FNPMP that supports the provision of hotel guest travellers accommodation within the Fiordland National Park. Therefore, I consider the proposal to be contrary to the objectives set out in the FNPMP.

Purpose of the Conservation Act 1987 – section 6

46. Section 6 of the Conservation Act 1987 sets out the Department's function when administering that Act. This includes the concept of managing for future generations. Given the adverse precedent the approval this application would result in I do not see how this proposal is of benefit to any future generation.

125

125

47. It is acknowledged that section 6(e) allows "use for tourism". For the most part concessionaires utilise the special attributes of conservation land to undertake tourism activity, with very little in the way of permanent structures, more particularly those operating in National Parks. In my view allowing the permanent occupation of Fiordland National Park for private gain at the expense of the visitor experience of other Park users in the manner proposed would be inconsistent with the conservation values of the Park and the purpose for which the land is held.

CONCLUSION

48. The Department of Conservation is required, subject to the National Parks Act 1980, the National Parks General Policy and any conservation management strategy and national park management plan covering a national park, to "administer and manage all national parks in such a manner as to secure to the public the fullest proper use and enjoyment of the parks consistent with the preservation of their natural and historical features and the protection and well-being of their native plants and animals." (section 43, National Parks Act 1980).
49. The retention of public access to these areas for all persons is a fundamental part of New Zealand society. This is enshrined in the National Parks Act 1980, which clearly states that the public are "to have right of entry". The privatisation of our National Parks, which is effectively what is being requested as part of this application, runs counter to that philosophy.
50. Section 17U(8) of the Conservation Act 1987 sets out that nothing in this Act or any other Act requires the Minister to grant any concession if he or she considers that the grant of a concession is inappropriate in the circumstances of the particular application having regard to the relevant matters.
51. I have never made a submission on any concession before, but this application represents an unacceptable derogation and erosion of the purpose of our National Parks. In my mind it is clearly an inappropriate outcome and should be declined.



19 July 2018

125

152



**Note: Include pages two and three of this form with your response to DOC.
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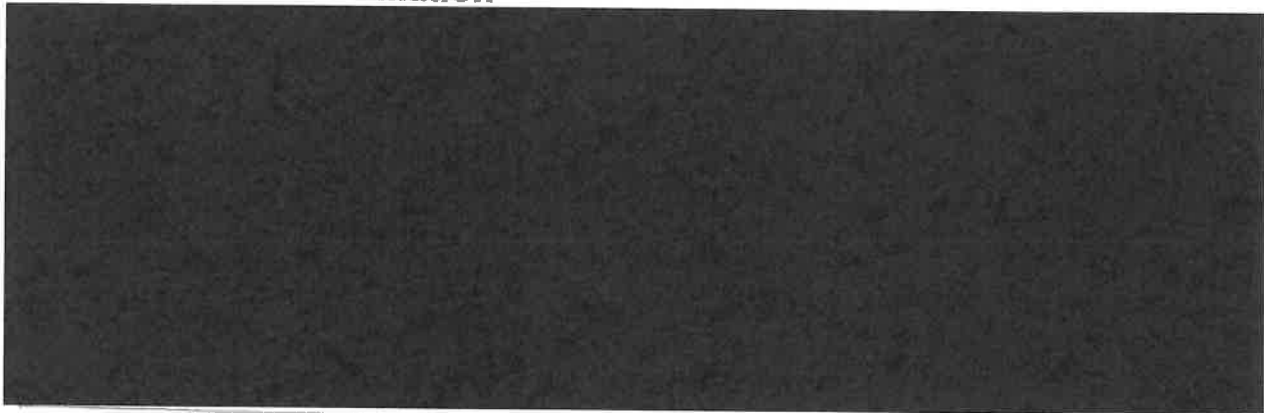
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) **Support / Neutral / Oppose** this Application.

E. Hearing Request

I (circle one): **Do / Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

We are strongly supportive of the entire application by Path New Zealand Limited for the reasons outlined below.

23.

126

My submission is [include the reasons for your views]:

The reasons for our support of this application in its entirety are as follows:

1. The proposal by Path New Zealand Limited (herein as 'the proposal') will provide a new sustainable and low impact accommodation and educational experience that will fill an obvious gap in accommodation options currently available within Fiordland National Park.

As suggested in the recent 'Stuff' article "Taking a hike: Why walking tourism is such a big deal" (8th July 2018), walking is a huge part of tourism in New Zealand with almost three quarters of our visitors going on some kind of walk / hike. Alternative accommodation infrastructure is required to address both the current and forecasted numbers of visitors to the Fiordland National Park and specifically the 'walking tourist'. The proposal will have considerably less impacts than other potential accommodation options that may be considered as a solution to this shortfall. Other accommodation options may include the construction of additional huts to be used by guided walkers (and associated helicopter movements), increased overnight boat options (greater use of diesel, larger environmental footprint overall and potential amenity effects on other users), additional camping facilities and more 'hotel/motel' developments (generally expected to be less sympathetic in terms of design, location, bulk and form than this proposal).

Through complimenting existing infrastructure and specifically the availability of accommodation options within the Fiordland National Park, this proposal also provides for the growth in older visitors (50 plus) who may be less likely to choose to carry their own food, cook for themselves and spend their evenings in sleeping bags on bunk beds with 50+ other guests. The 'Path' experience will provide an option for a more comfortable and catered short stay within the national park where they will be able to choose from a number of short walks and experiences. Their wilderness experience, although condensed will offer the same fundamental benefits for the visitor of being amongst the National Park and nature that these longer walks offer.

2. The location and design of the proposal by Path New Zealand Limited (herein as 'the proposal') is aligned with the objectives and policies of the Fiordland National Park Management Plan (FNPMP), June 2007, is compatible with current uses and users of the park and will not result in any adverse effects on the natural, historical and cultural, recreational, landscape and amenity values of Fiordland National Park.

The proposal combines education and accommodation within a remote and natural setting and therefore is well aligned with the fundamental goal of the FNPMP which is to increase the appreciation of our natural environment and the value of conservation. Furthermore, the proposal is consistent with objectives and policies relating to 'Milford Road Front Country', 'Visitor Management' and the criteria for 'Structures'. Specifically, the proposal is consistent with the following objectives relating to Visitor Management (emphasis and comments in underline added):

- To ensure the preservation of Fiordland National Park's natural characteristics, including the iconic status of Fiordland National Park, values and historical features while meeting the needs and aspirations of visitors (a low impact catered accommodation option that fills a current gap in the market).
- To allow for a range of both commercial and non-commercial recreational activities within Fiordland National Park managed in accordance with the range of visitor settings (Proposal consistent with Milford Road Front Country setting).
- To work with commercial operators within Fiordland National Park to promote visitor appreciation of the national park and world heritage values (Through increasing options for different visitor types, visitor appreciation of the Park also increases).
- To consider any proposal for changes to visitor settings in accordance with the natural, historical and cultural, recreational, landscape and amenity values of Fiordland National Park (The proposed change to the visitor setting of the Milford Road front country will be positive with minimal impacts on the aforementioned values of the Fiordland National Park).

Through educating visitors on the values of the national park and by promoting an activity and use of the Park that will have minimal impacts, the proposal is well aligned to the FNPMP. Specifically, the proposal addresses the need for visitors to be effectively managed by ensuring a range of quality experiences and options are available to them. In terms of providing for different visitor types, the overall goal of the FNPMP is to meet the needs of the visitors while preserving the values and characteristics of the Park.

25

126

In this regard, the proposal has been located and designed to ensure that any impacts will be contained to the immediate site and that any potential effects will be minimal. The proposed buildings will not be visible from the Milford Road (during day or night) and will be obscured by both distance (1500m +) and screened by flood banks. The location of the proposal has been well considered in terms of maintaining the amenity value of the site and maximising the wilderness experience, its proximity to nearby popular day walks (14 walks within 10 – 30 minutes' drive away from the subject site) and minimising impacts on flora and fauna. In addition, the proposal will have minimal impact on other users of the Park. It is unlikely that any alternative sites would offer the same amenity values, and most importantly have minimal effects on the surrounding landscape.

The proposed design of the buildings is also appropriate to the setting and will meet the criteria for structures included within the FNPMP. The low-rise and simple form of the various 'pods' as well as the selection of natural and recessive materials and colours and existing planting will mean that the buildings appear as a series of back country huts that are sympathetic to their surrounding landscape. Overall, the proposal will be within a location and of a design, bulk, height, form, material, colour and reflectivity that ensures the surrounding landscape is not degraded.

It is also relevant to note that the FNPMP became operative in June 2007 and is now overdue to be reviewed. Not surprisingly the FNPMP did not anticipate the projected growth in tourist numbers although it did envisage that there may be a need for visitor accommodation to be located within the Milford Road Front Country. While most of values and the overarching objectives and associated policies included within the FNPMP remain relevant, the opportunities for providing alternative accommodation options to respond to this growth within the National Park need to be reviewed. This proposal is both well aligned with the Park objectives and policies yet seeks to address the shortfall of low impact opportunities and a new type of accommodation experience. It is a forward-thinking proposal that seeks to cater for the growing need of visitors wishing to do short walks, and many who would choose a more comfortable and catered accommodation, if available.

The underlying goal of the proposal is well aligned with the FNPMP which is to encourage the use of the national park with minimal impacts. The 'Path' experience will offer people a short stay within the national park where they will be able to choose from a selection of short walks. Their wilderness experience, although condensed will offer the same benefit to the visitor of being amongst the National Park and nature that these longer walks offer. It is also relevant to note that the overnight DoC tracks and huts are often inaccessible to visitors due to their timeframes, fitness and the fact that these huts and tracks are usually booked out in June for the following walking season.

The granting of this proposal will not result in any precedent effects as the FNPMP and associated regulatory regime requires that all proposals must be allowable under the plan. The subject site of this proposal is located within the 'Milford Road Front Country' of the FNPMP and even back in 2007, the Plan envisaged that there may be a need for visitor accommodation within this area (albeit it probably wasn't required then). Other proposals either within Fiordland or in other areas will be governed by a regulatory regime where the formation of that plan has been subject to substantial public scrutiny and input.

The physical topography of the Milford Road Front Country also means that from a flooding, rockfall and avalanche risk perspective, there are very few places along the Milford Road that are suitable for accommodation and especially the type of accommodation that can be located and designed to ensure there are no adverse effects either on the environment or other park users and that is able to maintain the open and uninterrupted views and landscape of the Eglington valley.

3. The proposal will result in a number of positive effects that will outweigh any potential adverse effects.

This proposal is unique in that it will not result in adverse 'visitor impacts' as identified within the FNPMP. Common visitor impacts may include overcrowding, noise, incompatible uses and physical effects (track damage, and other adverse effects on sensitive natural ecosystems). To the contrary, this proposal is in fact likely to result in a range of positive visitor impacts as it will alleviate areas of overcrowding and over-use (including the various walkways accessed from the Milford Road, Milford Sound itself and the Milford Road). The proposal is likely to assist in managing congestion on the Milford Road and tracks as its location will allow guests to visit trails during off-peak times. Spreading flows of people to shoulder periods and off-peak times and year-round will result in positive flow on effects on other users of the park by making these locations less busy and seemingly more 'remote'.

251

126

As well as accommodation, the proposal will also include a strong educational and interpretation component which will seek to educate the visitors on the values of the park as well as the appropriate behaviours whilst in the park. This education will increase overall public awareness of the nature conservation and biodiversity values of the site and wider Fiordland National Park and may also encourage the public and other interested groups to become involved in conservation restoration and preservation initiatives.

As already addressed above in this submission, the proposal will compliment the accommodation infrastructure currently available within the Fiordland National Park and help to provide for the projected growth in "walking tourists" as well as the growing number of older visitors (aged 50+). Overall, this will seek to alleviate existing pressure on current accommodation options within the Fiordland National Park.

The provision of a more comfortable and catered accommodation experience also makes the park more accessible to a different type of visitor than the status quo and will encourage and enable more people to enjoy the benefits of the wilderness and immersion-in-nature Fiordland national park experience.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Grant the concession to lease land to build and operate a commercial structure in Fiordland National Park as sought by Path New Zealand Limited.

G. Your Signature



_____ 19/7/18 _____
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

251

126



Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

64177-ACC - Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eginton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Oppose this Application.

E. Hearing Request

I (circle one) Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

That this application has been notified when it is clearly (eggs) DOC should not have notified it, but declined it at the outset. There is no explanation from DOC about why it has been notified and not seen as illegal. It is not consistent with the National Parks Act.

There is no recognised need in the Fiordland National Park Management Plan to allow such facilities to be built outside of currently used commercial areas.

The site is inappropriate for commercial use, being in the Eginton Valley which is a one of the direct valleys in

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127

NZ where you can appreciate nature in its natural state without human structures and where the public have the right of entry and can explore freely.

My submission is (include the reasons for your views)

The application directly contradicts policies for accommodation in section 9 of the General Policy on National Parks (GPNP) - especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities, but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use is contrary to the Fiordland National Park Management Plan: specifically the objectives for Milford Road, (section 2.3.2.2 - 13 page 178)

This notification process can only be described as politically motivated and the public deserves to know who within the Department is responsible for this decision. That person has acted in their job against the Act which they are being paid to enact.

What outcomes would you like to address with your submission? (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought)

Remove from notification

Or if you won't do that

Decline outright

G. Your Signature



20.07.2018
Date

Please complete this form and send to consul@docons.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Mirry Place, Dunedin 9058. Attention: Lisa Wheeler, Permits Advisor

51

127



A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s) *Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park*

C. Submitter Information-



D. Statement of Opposition

Oppose this Application.

E. Hearing Request

I wish to be heard in support of this submission at a hearing (preferably electronically).

F. Submission

The specific parts of the application that this submission relates to are:

The Entire Application

My submission is that:

1) The application contravenes the intentions, provisions and spirit of section 4 of the National Parks Act 1980, which states that national parks are to be *preserved as far as possible in their natural state.*

The exclusive use of this very special part of the Fiordland National Park is absolutely not consistent with the same National Parks Act. The appropriation of public resources for private benefit and profit by a wealthy individual is an abhorrent anathema to the spirit of the act.

2) Path New Zealand Limited's proposal contradicts clause 8.1(c) iv) in the General Policy document for National Parks 2005 - that planning and management for recreation and other opportunities of each national park should *maintain the distinctive character of recreation in New Zealand national parks, including the traditional New Zealand backcountry experience with its ethos of self-reliance.*

3) The proposal does not comply with the current Fiordland National Park Management Plan. Section 5.3.9.2, Implementation 13 states that *"New proposals for travellers' accommodation should be considered in accordance with Chapter 9 of the General Policy for National Parks*

851

128

2005; however, in general it is considered that there is adequate travellers' accommodation already provided within Fiordland National Park or at nearby locations".

4) Though curiously not admitted or mentioned by the applicant, the proposal will involve the extensive use of diesel generators and bottled natural gas both of which depend entirely on fossil fuels. This is totally unsustainable as well as contributing substantially to undesirable greenhouse gases, climate change and various toxins being released into the surrounding environment. The type of client likely to use the facilities will almost certainly be travelling from overseas and would typically have a huge carbon footprint. Typically one individual person travelling to New Zealand from the northern hemisphere would be responsible for the emission of at least 10 tonnes of carbon dioxide into the atmosphere.

5) The risks and hazards and deleterious effects of disposing of wastewater and sewage are grossly understated and have clearly not been properly evaluated. Soil and vegetation disturbance associated with that will be very significant. The risks of spillage from the large diesel tanks have not been properly assessed or described either..

6) The proposal will result in the creation of considerable nuisance in the area. Noise and emissions from the generators, light pollution in the evenings, disturbance to fauna (especially bats) and flora, and substantial undesirable vehicular traffic activity by customers, staff and service vehicles.

7) The report titled "Vegetation assessment & general comments on terrestrial environmental impacts" is woefully skimpy and lacks the scientific robustness expected of such a document. Despite listing a few references it lacks credibility and relevance.

8) The applicants stated "benefit" of spreading the visitor load at Milford sound is disingenuous and spurious as is the suggestion that the lodge will reduce deer numbers.

9) I wish to endorse the submissions of Forest & Bird Society and Federated Mountains Club.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I would like the Department of Conservation to decline this application in its entirety and for the Department to establish much better systems for screening applications of this nature which clearly do not meet criteria set out in relevant statutes & statutory planning documents so that they do not proceed to the public consultation stage squandering needless time and energy and angst. The Department should employ competent planners who are conversant with the various statutes involved in concessions. I also would like the Department to develop policy regarding the consideration of carbon footprints of tourist related activities on Conservation Land in New Zealand in the context of the provisions of the impending Zero Carbon Bill/Act about to be drafted/implemented. This will be essential/vital for the future survival of our grandchildren and planet earth.

Signature

[Redacted signature area]

18th July 2018

85

128



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

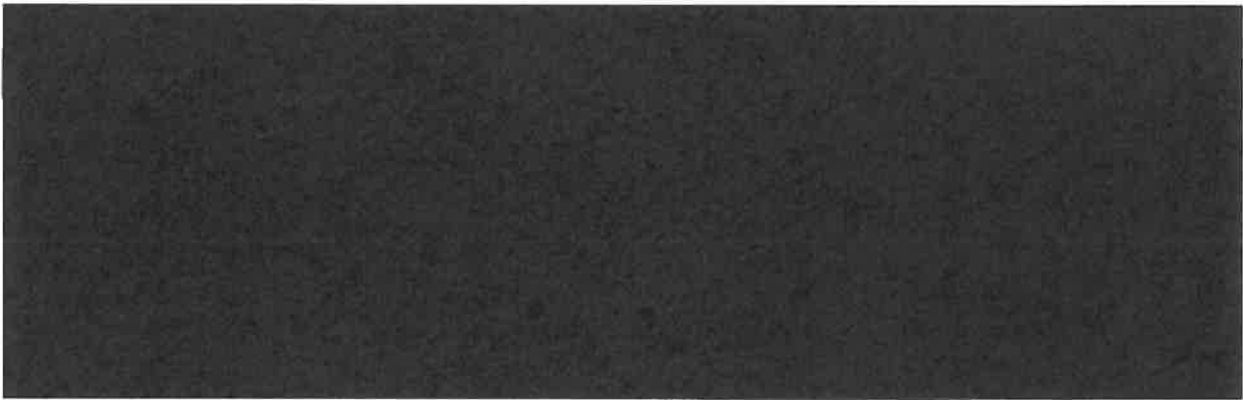
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

I Do wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The issue of a lease or licence for exclusive use of land within Fiordland National Park and the construction of buildings and associated infrastructure on that land for the operation of a business

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129

My submission is [include the reasons for your views]:

Our submission is opposed to this application.

1 We believe that the application does not fit with the principles stated in Section 4 of the National Parks Act 1980.

There is no reason to use public land for a private/commercial facility. There is land that Path can purchase or obtain a lease of that is privately owned. Allowing this application will encroach unnecessarily on land set aside for the public.

The exclusive nature of the application goes against the values of allowing the public access to the National Park. The application carves out an area of the National Park and creates an exclusive experience for only those people who can afford it. One of the benefits of the National Park is that it is an area that is open to everyone. Allowing this proposal erodes that. If it is allowed in this case it will set a precedent both along the Milford Road and in relation to other National Parks.

The proposed track is not needed for a nature experience. As noted in the proposal there are already many walking tracks along the Milford Road. Further development is not required.

In addition s 50(b) of the National Parks Act 1980 was repealed. That section provided for the granting of leases and its removal signals that there was no longer to be an ability to grant such an application. Therefore Path's application should be refused.

2 The application is inconsistent with the General Policy for National Parks. In particular: *"National parks are held for their intrinsic worth – that is for the value that they have, just because they exist – quite separate from any value that humans may ascribe to them. They are places where human interference, modification and control should be minimal, and enjoyment of them should be on nature's terms."*

3 The application is inconsistent with the Fiordland National Park Management Plan 2007. Part Five subsection 5.1 provides: *"Although Fiordland National Park contains a vast visitor resource, it is not essential nor indeed desirable to provide for every possible user taste or preference. Outside Fiordland National Park many opportunities are available, or potential exists for them,"*

There are many opportunities to establish such proposed buildings and infrastructure on private land outside of Fiordland National Park.

Further, the Plan states that *"the preference would generally be to have new facilities located at already modified sites."* Therefore, if a lease were to be granted in the National Park it should be granted in relation to a site that is already modified, e.g. Knobs Flat.

Once the lease is granted there is a high probability that a variation will be sought allowing the construction of more buildings.

The "extensive modification" of the Eglinton Valley referred to by Path is misleading. Whilst it has been altered from its natural state it has not been developed or urbanised as is proposed by Path. The pastureland could be reforested but also has historical value. The proposed development only has economic value – to Path.

The proposal does not offer new opportunities it just provides the opportunity for people to pay more for the same experience.

The reasons given for not locating the proposed development at other locations are flawed. There are plenty of examples of high value accommodation located next to low value accommodation in Queenstown, Wanaka, Te Anau and so on. Locating them next to each other minimises the amount of infrastructure required and lessens

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129

the disruption to the natural environment.

The proposal is not going to ease traffic congestion. The guests are still going to be using Milford Road in their own cars. A better option would be to provide a luxury mini bus from Te Anau or Queenstown thereby reducing the number of cars on the road – not just shifting them along it. Alternatively they could invest in virtual reality technology so no travel is required.

4 Any granting of a lease or licence of this type within any National Park in New Zealand would set a precedent and encourage further applications of this type and variations to the lease/licence increasing its scope.

The background experience of the company that has made the application is zero. While an advisory board may be involved they have no stake in the company and cannot control the company; Abbe Hutchins is the sole director and shareholder. With no experience to speak of allowing a development of this nature would be a risk; there is a possibility that the development will not be completed and then the natural landscape will have been altered for nothing.

Granting the lease/licence will lead Path to have expectations that it will have a continued right to exclusive use of the land. The proposed 5 year rolling lease is opposed for the same reason. There should be a condition that at the end of the lease or earlier termination for any reason Path is required to restore the land to its original state.

Many already established businesses in Te Anau struggle in the shoulder season and over winter. Therefore the proposed development will simply be taking business away from existing infrastructure when there is no need to waste resources constructing more.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Application is refused

PSI

129

G. Your Signature



20/07/18
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

PS!

129



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

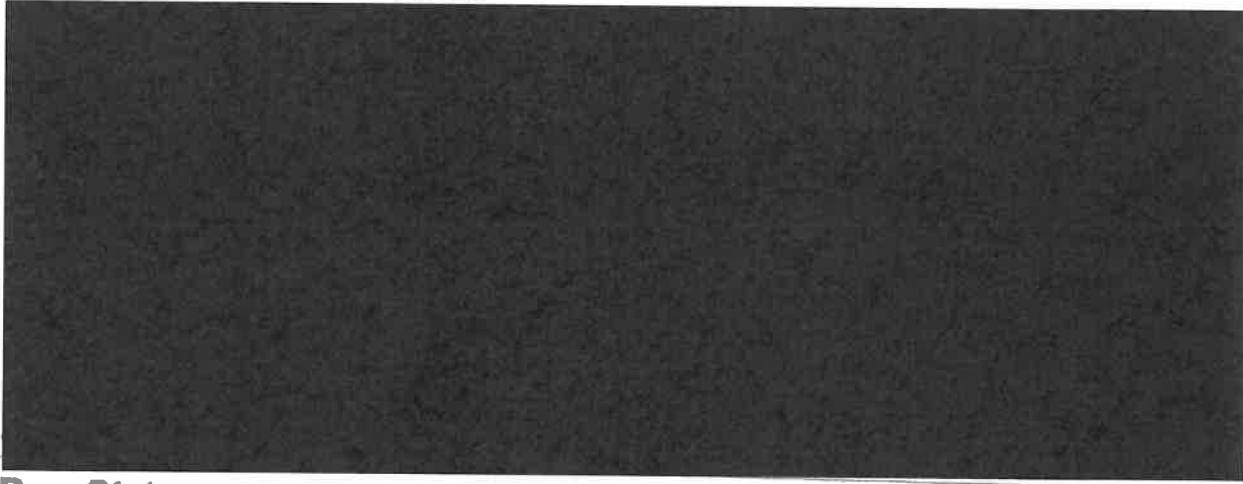
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): Do **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

All parts, as I think it should be declined as a commercial development. A nature trail and carpark may be an appropriate development as a public facility.

130

130

My submission is [include the reasons for your views]:

I oppose this proposed development as it:

1. Is not appropriate use of this sensitive and particularly scenic area.
2. does not fall within the Intent of the Fiordland National Park Management plan
3. is more appropriate that commercial accommodation developments be restricted to existing facility sites or outside of the national park.

Explanations:

1. The proposed site is one of the most scenic sites within the Eglinton Valley and should be available for all potential visitors to enjoy. It is not appropriate for the site to be leased or commercial development to take place there. It is an ideal site for future development of a public nature walk.
2. Although the Fiordland National Park Management Plan does provide for some commercial visitor accommodation facilities within the Eglinton Valley, the intent of including this provision was primarily to allow for the existing Knob's Flat site. Knob's Flat facilities evolved from an earlier era and times have now moved on expansion of commercial accommodation facilities within most areas of Fiordland National Park are now not appropriate. If approved the proposal would encourage a flood of similar developments from people keen to cash in on the growing tourist industry.
3. Better utilisation of the Knob's Flat site would a more appropriate approach to growing such facilities in the Eglinton Valley. Te Anau Downs could also be a good alternative site. All of the existing FNP leased site there is not fully utilised for accommodation facilities and DOC should consider negotiating and alteration to the lease to allow such developers to use current FNP lease land that is not being used for accommodation facilities.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Proposal to be declined.

G. Your Signature



Date

20/7/18

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

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130



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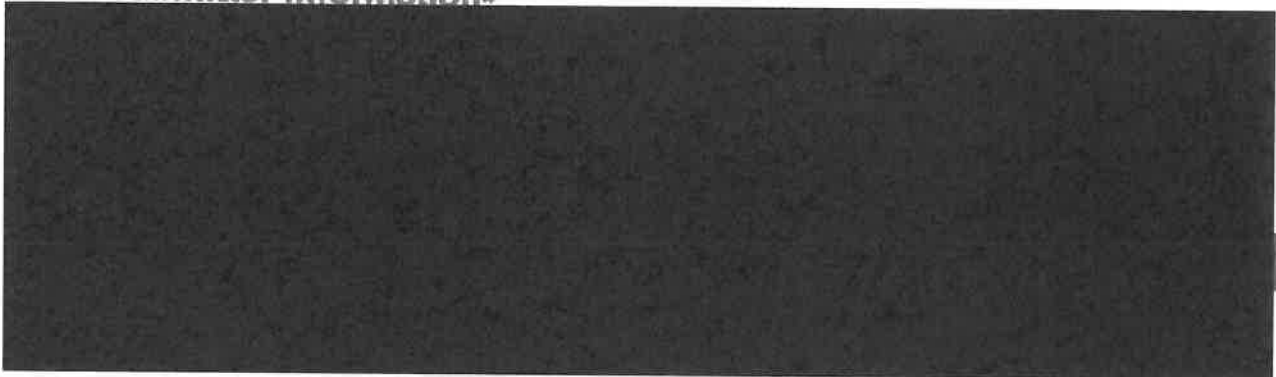
A. Permission Application Number and Name of Applicant

64177-ACC - Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information



D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one) **Do** / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The entire application

(121)

(131)

My submission is [include the reasons for your views] The proposed activity in that part of Fiordland National Park is contrary to the Fiordland National Park Management Plan and general advice of New Zealand National Park. Leave it as a wilderness area. Do not pollute it with such infrastructure and roads. Preserve our wilderness heritage for us and posterity. This plan is for tourism security interventions.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

There is no way to improve the application by amendment. It is hopeless at the outset and deeply offensive to New Zealanders.

G. Your Signature



22-7-2018
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to Director-General, c/o Department of Conservation, PO Box 5244, Murihau Place, Dunedin 9158. Attention: Lisa Wheeler, Permissions Advisor

(181)

(131)



Forest & Bird
· GIVING NATURE A VOICE

Submission on an application for lease and licence to build and operate a commercial structure in Fiordland National Park by Path NZ Ltd.

To: Director-General
Department of Conservation
Box 5244
Moray Place Dunedin 9058

20.7.18

By Email: DNSubmissions@doc.govt.nz

From: Royal Forest and Bird Protection Society of New Zealand Incorporated



Introduction

1. The Royal Forest and Bird Protection Society Incorporated ("Forest & Bird") has campaigned for more than 90 years for the protection of New Zealand's native species and the habitats on which they depend. Forest and Bird was at the forefront of calls for the creation of Te Wahi Pounamu and has been actively involved in protecting the values of Fiordland National Park since the Park's establishment.
2. Nationally, Forest & Bird has approximately 80,000 members and supporters who support the Society's objectives of securing protection for native species, ecosystems, and landforms.
3. Forest and Bird opposes the application for a license for lease and licence to build and operate a commercial structure in Fiordland National Park by Path NZ Ltd.
4. Forest and Bird wishes to be heard on the matter and do wish to be involved in any further consultation relating to this application...

The setting

581

132

5. The proposal is on the Eglinton River Flats in Fiordland National Park and is part of Te Wahipounamu South West New Zealand World Heritage Area.
6. Te Wahipounamu South West New Zealand World Heritage Area was gazetted in 1990 using a Statement of Outstanding Universal Value
7. The Eglinton Valley contributes to the values identified in the statement as:

"It is an area of magnificent primeval vistas: snow-capped mountains, glaciers, forests, tussock grasslands, lakes, rivers, wetlands and over 1000km of wilderness coastline. Only traces of human influence are evident and then mainly in peripheral areas." (Criteria vi).¹ It is also likely to be home to threatened wildlife and contributes to the diversity of glacial landscapes and plant succession after glacial retreat, Criteria vii, and represents part of the continuum of largely unmodified habitats and altitudinal gradients, Criteria (ix).

8. The proposed lodge is within and on the fringes of a tongue of mature red beech forest, which are associated with the warmer more fertile sites. This particular site is known as the Murcott Burn Flats. The Common area and the staff quarters are proposed to be located in a clearing and within the margins of a mixed small conifer shrub land which is described as having high botanical values by Lee.² Lee considers that the lowland forest-grassland-wetland complexes associated with the Eglinton Valley Flats are rare in adjoining valley systems. The Eglinton Valley forms an important transition zone between the western high rainfall ecosystems and vegetation associated with relatively drier conditions further east.
9. The proposed lodge is about 3.5km north of Knobbs Flat which is the last settlement in the Valley before reaching Milford Sound. The lodge represents a new settlement deeper into the Park in the open unsettled and more remote part of the Eglinton Valley and would be the only physical structure in the vicinity of the Eglinton River beyond Knobbs Flat. Beyond Knobbs Flat, apart from the State High Way natural character predominates in the Eglinton Valley part of the National Park and there are no semi-permanent structures of any significance. There are some permanent structures in the adjoining Hollyford Valley, at Gunn's Camp and the long existing NZ Alpine Homer Hut.
10. The valley was initially leased for grazing in 1954 apparently as a means of controlling the tussock lands in areas open for camping to prevent a fire hazard.³ Grazing was finally eliminated in 1999 after years of concern about the impact of the grazing on the valley grasslands and forest edges.

¹ <http://whc.unesco.org/en/list/551> Te Wahipounamu – South West New Zealand

² Lee W.g. 1991. Eglinton Valley-botanical values in relation to sheep grazing. DSIR Land Resources Contract Report No.91/52.

³ 1959 Transactions and Proceedings of the Royal Society, Vol 86. "While travelling in the South Island in December the Convener of the Conservation Committee noticed that sheep were being grazed inside the Fiordland National Park, and that the greater part of the Eglinton Valley tussock flats had been either spoiled or destroyed by grazing." http://rsnz.natlib.govt.nz/volume/rsnz_86/rsnz_86_03_003930.html

Threatened Species

11. Red, scarlet and yellow mistletoe both At Risk declining are present. Important populations occur in the Murchison Mountains and on the eastern lake faces of both the Glaisnock and the Eglinton valleys. Also scattered at many other sites, including Fiordland islands.⁴
12. The applicant has not surveyed the site for fauna, however given that the valley is home to populations of threatened bird species including Mohua, (Recovering) Kaka, (Nationally Vulnerable) and long tailed bat (nationally Critical). Mohua have gone from being Nationally Vulnerable to recovering due largely to the increase in the Mohua population of the Eglinton Valley as a consequence of predator control. There has been no assessment for lizards and geckos or invertebrates.

Effects

13. The following adverse impacts are likely to occur:
 - a) Disturbance of mature red beech and silver beech forest floor habitats to lay dripper irrigation system for wastewater treatment, and establish a 500m wide access road.
 - b) Felling of (mature?) trees and disturbance of vegetation for the development of a car park for 30 cars on the side of the Milford State Highway, staff quarters and other buildings and infrastructure and possibly the access road. The clearance may result in exposing the forest to further wind-throw and so over time increasing the size of the clearance.
 - c) Reduction of habitat for threatened species including bats, mohua, kaka, It is possible that bat roost trees, and nesting trees for birds could be impacted.
 - d) Disturbance of vegetation for the placement of diesel tanks and ? bunds.
 - e) Potential loss of trees for wildlife including bats, kaka, mohua and kakariki.
 - f) Vegetation disturbance and possible tree felling associated with the development of a wheel chair accessible track.
 - g) Risk of introduction and possible establishment of weeds and greater presence of pests (such as mice and rats) through personnel and clients, machinery, materials, and food. Weeds associated with previous grazing are not necessarily the same as those that could be introduced in gravels and building materials.
 - h) Noise from the site including generators, 4 wheel bike/s, groups of people moving and chatting, car and bus parking, 4 wheel motorbike which will impact on the surrounding natural quiet. Helicopters are proposed to be used for transporting black water off the site. There will be unavoidable noise during the construction phase.
 - i) Lighting from the accommodation and presumably the access track. Lighting albeit down lighting may impact on invertebrates, especially moths and bats and may be visible to other users of the Park.
 - j) Exclusion of free public use of the site including for tenting, and walking and possible displacement of public use. Also the possible exclusion of public access to the car park.

⁴ <https://www.doc.govt.nz/Documents/science-and-technical/sap263-3.pdf>

- k) Reduced public enjoyment in the immediate vicinity of the site and from the general knowledge of the presence of the lodge. As noted in the GPNP large groups, can erode enjoyment of national parks in their natural state and as places of refuge from commercialism and urbanisation. GPNP
 - l) The car park will be visible to all users of the Milford Road and there will be a visual presence of the site at the entrance way, and it is likely to be visible from some of the surrounding hills and mountains.
 - m) Proposals to take responsibility for the predator control might displace volunteers including some of whom who may have had a long term commitment to this place.
14. Taken together and despite the proposed mitigations all of these impacts will degrade the national park and World Heritage Area values and impact on the wider general public's enjoyment and freedom of use of the Park. It is contrary to the ethos of our national parks and Section 4 of the National Parks Act.
15. The lodge and associated infrastructure will not contribute to the preservation of the intrinsic values of the national park, and the public's freedom of access to the park will be reduced.

Benefits

16. The applicant alleges the lodge will have a number of benefits including increased appreciation of nature by their guests and help in relieving congestion on the Milford Road in Milford Sound and some surrounding tracks.
17. Similar experiences are already available and provided by the Park's public facilities as well as guided experiences and lodge accommodation. The extent to which this activity will reduce daily or peak congestion at Milford and on other popular day walks, if it occurs at all is relatively small given the number of visitors to Milford.
18. Providing for 40 guests and staff to linger in Milford Sound beyond or before peak times will increase the numbers of people in the supposed 'quiet times' and so impact on other users who also try to avoid peak Milford.
19. Despite the loss of habitat and loss of vegetation, and appropriation of public resources the applicant is not proposing to provide any new benefits for biodiversity or improve freedom of public access.
20. The proposal is a non-essential private commercial operation which should be directed to private lands outside the Park, or Knobs Flat.

Insufficient Information

21. The applicant is proposing that final plans and specifications for the activities and plans to mitigate effects will be provided after the concession is granted, consequently the applicant has provided insufficient information in respect of the proposal including the following matters.

22. There is an insufficient description of the native flora and fauna. One mid-winter vegetation assessment is provided. No surveys of birds, bats, skinks, geckos or invertebrates have been conducted. Consequently it is not possible to assess the values of the site.
- There is a general description of fauna that is applicable to the valley as a whole not the particular site. There has been no assessment of the habitat for threatened wildlife species, or for example whether there are bats roosting here, whether kaka or Mohua nest here. Effects on the bat population maybe minor if only one or two roost trees without bats being present were felled, but could be significant if a roosting cluster was felled.
23. The options for sewage treatment are not fully presented as the applicant intends that an appropriate wastewater system will be considered in more detail in the resource consent process. The impacts of this application in its entirety needs to be considered under the National parks Act and it is not appropriate to leave an aspect of it to be dealt with under the Resource Management Act which has a different purpose.
24. The application is silent on the number of trees, size, age and location that will be felled during development of the site, car park or the track. The only information supplied is a statement saying that: "...as much as possible mature trees would be left in place and the carpark is formed in a sensitive manner taking into account existing trees." and that the proposal is to avoid felling trees with a diameter of more than 5cm". In relation to the buildings the applicant states; "we are hopeful that very few of the trees would need to be removed. At this stage approximately 10-20 medium sized trees appear to be located in the same area as the building platform." There is no certainty in these statements. Consequently it is not possible for the decision maker or the submitter to assess the environmental impacts, including increased potential for wind throw.
25. Designs for the car park are not included in the application thus the potential footprint of the car park is unknown, and the application suggests that the lease area for the car park may change over time.
26. The frequency and impacts of the use of helicopters to remove Blackwater is not provided.
27. The proposal includes the development of a road and any proposal for a new road requires a full assessment of the adverse effects as well as identifying how the proposal will improve the effective management of Flordland NP and an audit of this assessment should be required. (Policy 5.7 – p 244 FNP Management Plan.
28. The applicant suggests that they intend to collaborate with DOC and participate in and continue its programme of animal pest control. The extent of intended pest control is not specified, so submitters and decision makers are unable to assess the potential benefits of the program.
29. There is insufficient data on the locations from which the site will be visible during the day at night especially from the surrounding alpine areas. Not all park users stick to tracks.

30. The applicant requires exclusive occupation of the site and the carpark, but it is not clear how this will be achieved. Signs and any physical structures prohibiting public entry have an impact on public enjoyment of the area – there is no assessment of this.
31. There is insufficient information to be clear that the applicant is not seeking an exclusive lease or licence over the access track area and nature trail.

Statutory Tests

32. Forest and Bird considers the application should be declined as granting it would be contrary to:
 - a) Sections; 4, 5, 43, 49 50 and 55 of the National Parks Act 1980
 - b) Sections 17 S, 17 U2, U3 U4, U5, U6 U7 of the Conservation Act 1987
 - c) General Policy National Parks 4.1 (b), 8.1(b) & (c), 8.6(a) and (f), 9 (c) and (d)
 - d) Fiordland National Park Management Plan – Sections 4.3, 5.3.9 and 5.7

National Parks Act

33. Section 49 2(b) provides that the Minister may not grant a concession unless she is satisfied it is not inconsistent with Section 4 of the Act. The application is inconsistent with Section 4. The application fails to preserve the Park as far as possible in its natural state. There is no public need neither is the project not nationally significant and there are no positive benefits for native flora or fauna and no improved access to Fiordland National park that could possibly outweigh the primary purpose of preserving the Park in its natural state. There is no justification for granting the application.
34. The Minister may authorise the cutting and destruction of vegetation but only if it is consistent with the management plan, s5. and before granting a new lease or licence the Minister shall have regard to the provisions of the Management Plan.
35. There is a higher test for new accommodation (S50) and new roads within Section 55 (2). Both require the applications to be in accordance with the management plan. E.g. Section 55 (2). provides; “ *Except with the consent of the Minister given in accordance with the management plan for a park, no roads may be made over or through the park.*”
36. The provisions of the Fiordland National Park Management Plan are considered below.
37. Section 49 provides that the Minister may in accordance with the Conservation Act grant a concession in respect of National Parks.

Conservation Act

38. Section 17 S sets out the contents required in an application. As set out above this application fails to adequately describe the ecosystem and biodiversity of the site and has not adequately described all the potential effects of the activity nor provided sufficient details of how the adverse effects will be avoided, remedied or mitigated.

39. Section 17 U (2) provides that the Minister may decline the application if the Minister considers the information is inadequate or insufficient to enable assessment of the effects or there are no adequate or reasonable methods for remedying, avoiding or mitigating the adverse effects. As is described above, the approach taken by the applicant in proposing that final plans and specifications for the activities and plans to mitigate effects will be provided in detail after the concession is granted is inconsistent with Section 17 U2 (a) and (b).
40. The application cannot be granted as Section 17U (3) provides that: "The Minister shall not grant an application for a concession if the proposed activity is contrary to the provisions of this Act or the purposes for which the land concerned is held." The land is National Park and there is a presumption of freedom of access for the ordinary public.
41. Under Section 17U (4) The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing structure or facility, where he or she is satisfied that the activity—
(a) could reasonably be undertaken in another location that—
(i) is outside the conservation area to which the application relates; or
(ii) is in another conservation area or in another part of the conservation area to which the application relates, where the potential adverse effects would be significantly less; ..
42. The application considers and dismisses alternative sites such as Knobbs Flat and Te Anau Downs Station on the basis that it would not be possible to develop a commercially feasible high value product situated within close proximity to budget accommodation and campsites. The other reason given is that at Te Anau Downs expansive views of the valley are blocked by trees within the national park.
43. It is a preference to develop a high end lodge in a secure and secluded site away from other developed sites but it is not an essential activity for the park, nor is it an essential market that will benefit the park. Path has not demonstrated that it would not be reasonably possible with good design to create accommodation suitable for their target market at the alternative sites. The alternative sites at Knobbs Flat or Te Anau Downs share similar attributes to the proposed site in relation to proximity to Milford Sound, and short walks, risk exposure to hazards. A development at the alternative sites would have less impact on other park users, and on the flora and fauna and natural character of the Park.
44. Section 17U 6 requires the Minister to be satisfied that exclusive possession is necessary for:
(a) the protection of public safety; or
(b) the protection of the physical security of the activity concerned; or
(c) the competent operation of the activity concerned.
45. Section 17 U (7) states: For the purposes of subsection (6), the competent operation of an activity includes the necessity for the activity to achieve adequate investment and maintenance.

46. The applicant seeks exclusive possession of the site for the buildings and seemingly also the forest, road and nature trail and the car park. The applicant acknowledges exclusive possession is not necessary for the protection of public safety, but that the car park, road and nature trail is essential for the operation of the experience for the guests, and consequently public use for camping would need to be restricted. No evidence is attached to demonstrate the necessity for this in terms of securing adequate investment and maintenance. If the applicant wishes to secure a wilderness experience where members of the public are excluded, then they should utilise existing private property not national park which has a purpose of providing freedom of public access.

General Policy National Parks

Powered Vehicles

47. The application includes the establishment of a road for a quad bike and trailer. The GPNP provides a high test for new roads and vehicle use in parks.
48. Section 8.6(a) states: A national park management plan should specify where the use of vehicles and any other forms of transport may be allowed:
- i) consistent with the outcomes planned for places; and
 - ii) where adverse effects on national park values, including natural quiet, can be minimised.
49. Section 8.6(f) states: Powered vehicles should not be taken into or used in national parks except on roads formed and maintained for vehicle use, and on routes specifically approved for use by a specified type of powered vehicle in a national park management plan.
50. As discussed below the proposal is not in accordance with the FNP Management Plan as it does not meet the tests required.

Accommodation and related facilities

51. The proposal is inconsistent with GPNP Policy 9 (C) and it is not consistent with the purpose of the National Parks Act or the National Park Management Plan as described above and below.
52. The proposal is inconsistent with GPNP Policy 9 (d) (i) as the application does not demonstrate that the lodge can't reasonably be located outside Fiordland National Park as discussed above.
53. The lodge could be built at Knobs Flat which is an existing modified site where the potential effects would be significantly less.
54. Under Policy 9 (e) viii) the accommodation and related facilities are to be available for public use. Public accommodation is defined as Place to live or lodge in that is open to or shared by all people and public interest is defined as open to or shared by all people. The

facility will not be open to unrestricted public access, as it is proposed the site will be restricted to those who have permission from the private owner through a form of payment. It will be inaccessible to the ordinary person.

Exclusive Use

55. The NPA (with some constraints) provides for the freedom of entry and access to National Parks for the general public, as a social right in the use of public resources.
56. In effect it is exclusive private use as the owners of the lodge determine who may enter and use the area of National Park, being those who are willing to pay considerably more than the publicly provided accommodation within the Park, and it is to the financial benefit of the private owner. The leased or licensed area will not be available to be shared by all people and is there for not in the public interest, as defined by the GPNP.
57. The appropriation of public resources for exclusive private benefit is not consistent with the National Parks Act.
58. The applicant seems to be suggesting that if exclusive use is not granted over the area of the road and nature trail then *"the current ban on camping (within 200m of the Milford Road) may need to be extended to include the area as the overnight wilderness experience could not operate effectively if campers were in close proximity."*
59. This is completely contrary to the ethos of national parks which is to provide the fullest extent of freedom of access for the general public provided it protects the welfare of the Park. This kind of restriction would be about protecting the enjoyment of the Park to the private guests of the lodge.

Fiordland National Park Management Plan

60. The site is within the Milford Road Place and is zoned as Front Country.
61. Section 5.3.92 sets out the objectives for managing this place which include protecting
 1. (a) the spectacular views of forested catchments, open grasslands, lake systems and mountain landscapes,
 1. (b) Its significant indigenous flora and fauna and

In the case of the Eglinton Valley in particular;

- 1 (d) The Eglinton Valley's open and uninterrupted views of the surrounding mountains and valleys and its overall sense of naturalness:

Objective 4 states: "To consider opportunities for facility development which will enhance public enjoyment of Fiordland National Park and appreciation of the natural values without

131

132

impairing or diminishing its natural values”.

62. The proposal is inconsistent with the Implementations of the Objectives for this Place. Implementation 13(e) states that new proposals for accommodation should be considered in accordance with Chapter 9 GPNP and observes that there is adequate travellers accommodation within the park or nearby.
63. Implementation 13(f) states that “Preference should be given to any facility development that utilises previously modified sites.....
64. The proposal is not consistent with the objectives or the implementations of this place as it will not enhance public enjoyment, it creates a new settlement, does not make use of a site that is already modified with accommodation structures and it will diminish and impair the Parks natural values.
65. It is not the purpose of National Parks to have to provide sites for the target market that Path is seeking, and it maybe that the requirements for comfort and luxury and expansive views of the Eglinton Valley are not in keeping with the National Park setting, and would be more appropriate on privately owned sites elsewhere.
66. The site is on the western boundary of the Front Country and is adjacent to the Earl Remote Visitor Zone. Being adjacent to the remote zone it has a higher natural character and natural quiet than sites immediately adjacent to the road. In the Earl Remote Zone helicopter landings are restricted to access for remote tramping opportunities only. The application includes the need for helicopter landings which will impact on the users of the Remote Zone
67. Section 5.3.9.2 describes the intention of the front country is that it should continue to absorb the greater part of any increased use of Fiordland, that further development may be desirable to effectively manage visitors and that further commercial development which enhance the visitor appreciation of the natural characteristics and values of the national park setting are likely to be acceptable. The plan states that the “Department of Conservation considers that the preference would be for proposals to make use of existing modified sites (e.g. Knobs Flat) and to provide new opportunities that are not offered elsewhere in the national park setting.
68. The proposal provides little if any improvement on reducing congestion at Milford and it does not provide new opportunities that are not offered elsewhere. As the application sets out there are numerous short walks nearby and off the Milford Road, and there is accommodation at Milford and opportunity for more development at Knobs Flat.

Section 5.7 Roading and vehicle use.

69. Although described as an access track it is in fact a road for a quad bike and trailer. The FNPMP defines track as a formed but unsealed way for foot traffic. Quad bikes are vehicles and road is defined as “a road that is formed and maintained for vehicle use by the public,

and includes (b) routes marked by the Department of Conservation for vehicle use by the public...

70. Objective 2 (p244 FNPMP) provides for new roading to be considered in the Front Country but only if they will improve visitor access and enjoyment of FNP without impacting significantly on other recreation opportunities and national park values. As there is already a route through the forest patch and a track just across the river the new road will not improve public visitor access.
71. The proposed access road will reduce public access as the road and surrounding area is proposed to be exclusive to those private visitors staying at the Lodge and attendant servicing requirements. It will impact significantly on the highly valued "freedom of public entry to our national parks and will not improve visitor access to the park.

Conclusion

72. Forest and Bird seeks that this application be declined in its entirety.

Yours sincerely



135

Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

64177-ACC -- Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eginton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application

E. Hearing Request

I (circle one): Do Do Not wish to be heard in support of this submission at a hearing

F. Submission

The specific parts of the application that this submission relates to are

THE ENTIRE PROPOSAL

My submission is [include the reasons for your views].

- 1) I AM OPPOSED TO THIS APPLICATION IN ITS ENTIRETY, AS
- 1) IT IS EFFECTIVELY PRIVATISATION OF PART OF A PUBLIC NATIONAL PARK FOR PRIVATE GAINS;
- 2) THE ENVIRONMENTAL FOOTPRINT OF THE OPERATION IS SIGNIFICANT - ITS CARBON FOOTPRINT ALONE DOES NOT HELP NZ MEET ITS OBLIGATIONS TO REDUCE CO₂
- 3) ALTERNATIVE SITES EXIST - ONE JUST UP THE ROAD - OR OUTSIDE THE NATIONAL PARK
- 4) IT ENCOURAGES YET MORE TOURISTS INTO AN ALREADY OVERCROWDED COUNTRY. TOURISM IS BECOMING A BURDEN, NOT A BENEFIT TO NZ - AND THE PLANET.

What outcomes would you like to address with your submission? (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought)

I WOULD PREFER TO SEE THE APPLICATION REJECTED, OR, AT BEST, SHIPPED & BURNED THE PARK BOUNDARIES AND ITS CARBON FOOTPRINT MINIMISED.

G. Your Signature



20-7-2018
Date

Please complete this form and send to DNSubmissions@dca.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Mowbray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor



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C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): Do **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

I am opposed the application in its entirety



My submission is [Include the reasons for your views]:

The purpose of National parks as stated in the national parks act is "they shall be preserved as far as possible in their natural state"

They are not for private profit but for the protection of New Zealand's unique and natural places. There are plenty of places this activity could occur outside of the park. There is no justification in the application for why the activity must occur in the park and why it could not be undertaken outside the park.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The application be declined

G. Your Signature



__20 July 2018_____
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

134

134



20 JUL 2018

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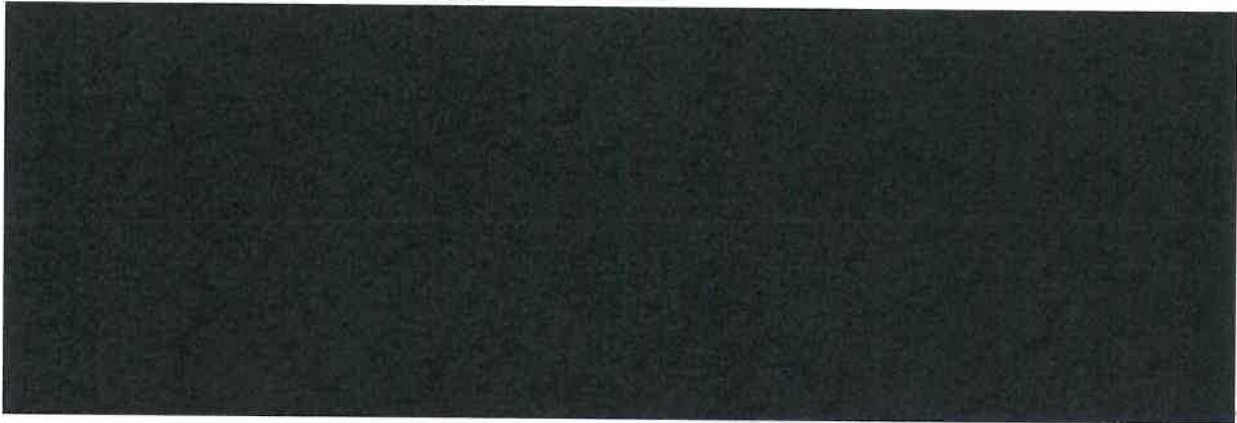
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Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) ~~Support~~ / ~~Neutral~~ / **Oppose** this Application.

E. Hearing Request

I (circle one): ~~Do~~ / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The proposal as a whole

(132)

(135)

My submission is [include the reasons for your views]:

I oppose this application. I am writing as someone who fully supports access to our National Parks and encouraging greater visitation through the Great Walks and other DOC walks and access opportunities.

At the same time, I am also someone who has enjoyed some of the luxury tourism and accommodation offerings on private land in remote parts of New Zealand. However, I am totally opposed to a commercial development of this nature in our National Parks / Conservation Estate as these two things do not go together.

As other submitters have noted and I support, there is ample space adjacent or close to our National Parks for commercial accommodation and tourism/hospitality services. There is absolutely no need to open access for these operations within the parks and especially in Fiordland National Park, arguably the jewel in New Zealand's crown.

Providing access of this type will set a dangerous precedent and encourage further encroachment. Once established, there is a need and desire to maintain such facilities and they create their own momentum, effectively establishing a permanent commercial presence within the park.

While I appreciate DOC has a broad mandate to encourage access to our Parks, I am disappointed that this proposal has passed the test to be considered at this stage. I think it is a step too far.

The guided walks such as those offered on the Milford and Routeburn Tracks offer an up-market tourist offering that utilises existing infrastructure that is shared with the Great Walks. While that makes sense, offering new, stand-alone accommodation options does not.

For similar reasons I was totally opposed to both proposals for transport access on DOC land from Queenstown to Milford Sound.

The very reason people travel from all over New Zealand and the world to visit these places is because they are, by and large, pristine wilderness environments that are without the distractions of modern and urban conveniences that exist practically everywhere else.

Bringing these commercial offerings in to the National Park environment is a terrible step.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I am opposed to this proposal in its entirety. I do not believe any mitigation will make it more acceptable.

G. Your Signature



Date 16 July 2018

23

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20th July 2018

The Director General
Department of Conservation
John Wickliffe House
Princes Street
Dunedin

DEPT OF CONSERVATION RECEIVED
20 JUL 2018
OTEPOTI / DUNEDIN OFFICE

attention: Lisa Wheeler

Dear Lisa, Please find attached my submission against the proposal to build a commercial lodge in Eglinton Valley in the Fiordland National Park.

Yours sincerely



(136)

(136)

Privatisation in National Parks

Please reject the proposal to build a lodge in the Eglinton Valley in the Fiordland National Park. The National Parks should be maintained in their natural state and people should be free to enter the areas I believe the special nature of the Fiordland National Park would be compromised by private accommodation being permitted in this Conservation Area.

The wildlife in the Eglinton Valley is extremely special. This is home to kato, Mohua, Blue Duck, Kaka, South Island Robins, terns nest here, also cuckoos, and tomtits all of which are rare or endangered. An increase in the number of Mohua has recently occurred due to extensive, and expensive, predator control and relocation of Mohua to this special, safe place

There would be a disturbance to the

1. 1. 1. 1. 1. 1. 1. 1. 1. 1.

roading and buildings, and the settlement of fifty plus people living there. The area is subject to high annual rainfall with heavy downfalls at intervals which would allow debris to be swept into the sewer with detrimental effects on aquatic life.

Runoff from roof and sealed areas, and waste and sewage would result in amounts of grey water intermittently overflowing, eventually into the Eglinton River.

This beautiful clean clear river and its wild life needs respect and protection.

Suggestions are that staying in the Eglinton Valley could improve visitor experience.

If similar accommodation were to be built on privately owned land closer to Te Anau, the travelling time would not be significantly increased as the Te Anau - Milford Highway is a good modern road. Up to forty travellers staying in the Eglinton Valley will not have any effect on the conqatation

Real Journeys, and before that Fiordland³ Travel, have been generous donors to Fiordland National Park. I trust that previous generosity will have no bearings on decisions of this kind.

The Department of Conservation should continue to protect land in the conservation estate, and not allow developments that would change the special nature of this very accessible wilderness.

This application to the Department of Conservation to build a commercial lodge for the exclusive use of guests impinges on the New Zealand peoples right of access. It appropriates public resources for private benefit, which is abhorrent to the New Zealand way of life and has no place in any National Park.

This commercial build is not in the spirit of the Conservation Act or the expectations that the people of New Zealand have of The Department of Conservation. It could create a precedent for applications for

Please do not allow this
inappropriate lodge to be built
in Fiordland National Park.

130



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B. Name of Proposed Activity and Location(s)

AAccommodation Facilities and Associated Services, Eglington Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) **Support** this Application.

E. Hearing Request

I (circle one) **Do not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

We

We are strongly supportive of the entire application by Path New Zealand Limited for the reasons outlined below;

(137)

(137)

My submission is [include the reasons for your views]:

We are a family of keen outdoors explorers and enjoy the natural beauty of New Zealand.

With a young family we are unable to access large numbers of the currently available DOC huts and back country accommodation. The needs of young children and the impact on other hut users make it very difficult to accommodate in the DOC huts. We have experienced several day walks with backpacks carrying our children, however suitable overnight accommodation is not always readily available, and a lot of huts work on a first come first serve basis. With young children the risk of missing out is not feasible. And the disruption to other hut users is not reasonable.

Engaging with the New Zealand outdoors is an important part of the education that we are looking to provide our family. It is important for us that we have opportunities to show our children that we can engage with our natural environment without adverse effect in sustainable and enjoyable ways. In our view PATH would provide that facility.

Additionally, the time and equipment needed to use these facilities is sometimes difficult to access. With the addition of PATH we will be able to solve a number of the current road blocks in taking our family on overnight stays in the national parks.

As our parents are getting to a stage where they are less likely to be able to access the majority of walk in huts in NZ, a facility like PATH will enable 3 generations of family to enjoy the great NZ outdoors and engage in areas that are otherwise inaccessible to them. This would be unique and there is not currently an option available for us to undertake this experience.

As the Department of Conservation controls nearly 30% of New Zealand land, we are keen to see a more diverse range of facilities and providers offering a broader range of experiences that would enable us and others like us to engage with this wonderful national treasure. Hunters, anglers and back country hikers have nearly exclusive access to the vast majority of this huge national asset. Facilities like PATH would enable the less able bodies or the less intrepid a stepping stone to experience a piece of this.

For these reasons we strongly support this application.

(137)

(137)

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

G. Your Signature



20-7-18

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

135

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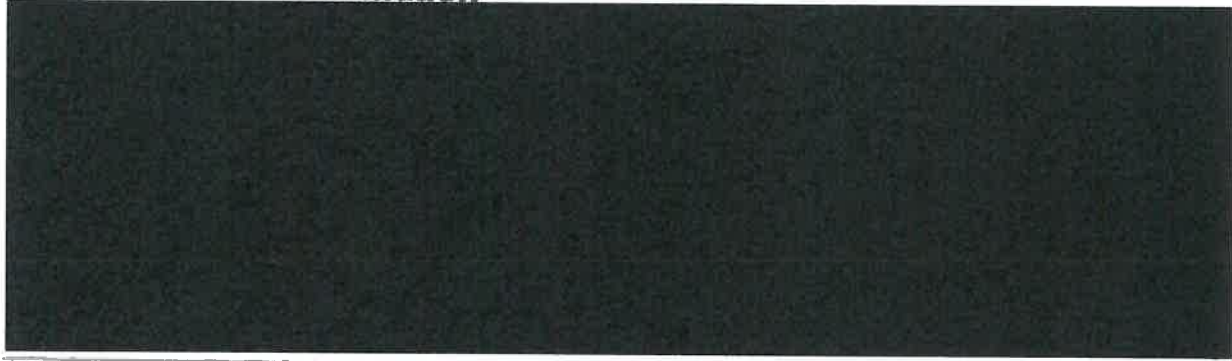
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C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

My submission is [include the reasons for your views]:

My husband and I are now retired and have more time to enjoy the wonderful NZ outdoors. We are not that keen on the 'back packing' style of accommodation and the need to carry all our equipment into a hut in order to experience some exclusive DOC national parks.

As long serving tax payers of this country, we feel we are not able to engage in the traditional DOC facilities, partly due to age and physical ability and also due to the somewhat unreliable nature of the facilities, with a first come first serve basis not really appealing to our age group.

We feel the PATH proposal addresses a number of these concerns and restrictions, by providing the kind of accommodation and 'creature comforts' that would appeal to us and the end of a day in a magical natural setting.

Without doubt this would also appeal to similar age groups globally and seems a great way to enable more people of differing backgrounds and travel preferences to engage in our unique and special natural wonderland. Surely it would also serve to reduce the impact on our current tourist hot spots and strained accommodation options.

Furthermore we would see a facility like this enabling a groupe catch up with long lost friends and importantly familis of multipte generations.

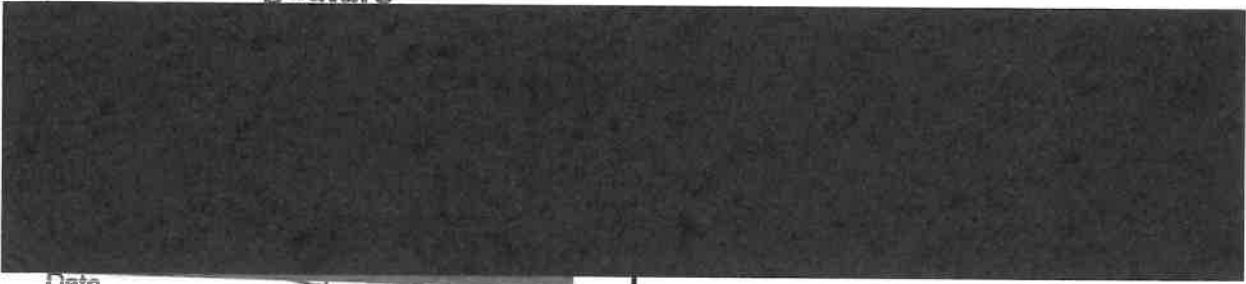
We wish PATH all the best for this submission process and hope to be making a reservation in the near furture.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

138

138

G. Your Signature



Date

20.7.18

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor

138

138

Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

131

139

My submission is [include the reasons for your views]:

My wife and I are now retired and have more time to enjoy the wonderful NZ outdoors. We are not that keen on the 'back packing' style of accommodation and the need to carry all our equipment into a hut in order to experience some exclusive DOC national parks.

As long serving tax payers of this country, we feel we are not able to engage in the traditional DOC facilities, partly due to age and physical ability and also due to the somewhat unreliable nature of the facilities, with a first come first serve basis not really appealing to our age group.

We feel the PATH proposal addresses a number of these concerns and restrictions, by providing the kind of accommodation and 'creature comforts' that would appeal to us and the end of a day in a magical natural setting.

Without doubt this would also appeal to similar age groups globally and seems a great way to enable more people of differing backgrounds and travel preferences to engage in our unique and special natural wonderland. Surely it would also serve to reduce the impact on our current tourist hot spots and strained accommodation options.

Furthermore we would see a facility like this enabling a groupe catch up with long lost friends and importantly famills of multiple generations.

We wish PATH all the best for this submission process and hope to be making a reservation in the near future.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

981

139

G. Your Signature



20 - 7 - 2018

Date

Please complete this form and send to DNSubmissions@dcc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor

PEI



Note: Include pages two and three of this form with your response to DOC.
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A. Permission Application Number and Name of Applicant

54177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglington Valley, Fiordland National Park

C. Submitter Information-



I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing

F. Submission

The specific parts of the application that this submission relates to are

THE ENTIRE PROPOSAL

041

140

My submission is (include the reasons for your views).

I AM OPPOSED TO THIS APPLICATION IN ITS ENTIRETY AS

- 1) IT IS ESSENTIALLY PRIVATIZATION OF ALL OF A PUBLIC NATIONAL PARK FOR PRIVATE GAINS;
- 2) THE ENVIRONMENTAL IMPACT OF THE OPERATION IS SIGNIFICANT - ITS CARBON FOOTPRINT ALONE DOES NOT HELP NZ MEET ITS OBLIGATIONS TO REDUCE CO₂
- 3) ALTERNATIVE SITES EXIST - ONE JUST UP THE ROAD - ON THE SIDE OF THE NATIONAL PARK
 - a) IT ENCOURAGES YET MORE TOURISTS INTO AN ALREADY CROWDED COUNTRY. TOURISM IS BECOMING A BURDEN, NOT A BENEFIT TO NZ - AND THE PLANET.

What outcomes would you like to address with your submission? (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought)

I WOULD PREFER TO SEE THE APPLICATION REJECTED, OR, AT BEST, THE FENCE REMAINS THE PARK BOUNDARIES AND ITS CARBON FOOTPRINT MINIMISED.

G. Your Signature



20-7-2018
Date

Please complete this form and send to DNSSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Momy Place, Dunedin 9098. Attention: Lisa Wheeler, Permissions Advisor

141

140



Note: Include pages two and three of this form with your response to DOC.
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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services: Eginton Valley, Fiordland National Park.

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / ~~Oppose~~ this Application

E. Hearing Request

I (circle one): Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing

F. Submission

The specific parts of the application that this submission relates to are:

1. The proposed development

141

141

My submission is {include the reasons for your views):

The application is to build infrastructure on peatland
which is a natural asset. The peatland should be
managed as such, the area surrounding natural peat
and should not be converted to natural peat. It is
essential activities that benefit very low value commercial
activities may be granted only if they are consistent with
the primary aim of the natural peat, i.e. protection and
conservation. The application is not consistent with
these aims. It would exclude the peat from
national peat land, for private gain. This must
not be allowed.

What outcomes would you like to address with your submission? (give precise details, including the parts
of the application you wish to have amended and the general nature of any conditions sought):

I wish the whole application to be refused
I wish the values of the natural peat and its
management plan to be upheld.

G. Your Signature



26 June 2018
Date

Please complete this form and send to DSPermissions@doc.govt.nz. You may also mail your submission
to: Director-General, c/o Department of Conservation, PO Box 5244, Marray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor



161



Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

64177-ACC - Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eginton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral Oppose this Application

E. Hearing Request

I (circle one) Do Do Not wish to be heard in support of this submission at a hearing

F. Submission

The specific parts of the application that this submission relates to are

The entire proposal

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My submission is [include the reasons for your views]:

- I AM OPPOSED TO THIS APPLICATION IN ITS ENTIRETY, AS
- 1) IT IS EFFECTIVELY PRIVATISATION OF PART OF A PUBLIC NATIONAL PARK FOR PRIVATE GAIN;
 - 2) THE ENVIRONMENTAL FOOTPRINT OF THE OPERATION IS SIGNIFICANT. ITS CARBON FOOTPRINT ALONE DOES NOT HELP NZ MEET ITS OBLIGATIONS TO REDUCE CO₂
 - 3) ALTERNATIVE SITES EXIST. ONE JUST UP THE ROAD - OR OUTSIDE THE NATIONAL PARK
 - 4) IT ENCOURAGES YET MORE TOURISTS INTO AN ALREADY CROWDED COUNTRY. TOURISM IS BECOMING A BURDEN, NOT A BENEFIT TO NZ - AND THE PLANET.

What outcomes would you like to address with your submission? (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought)

I WOULD PREFER TO SEE THE APPLICATION REJECTED, OR AT BEST, SHIFTED & BEYOND THE PARK BOUNDARIES AND ITS CARBON FOOTPRINT MINIMISED.

G. Your Signature



20-7-2016
Date

Please complete this form and send to DNSubmissions@dcs.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5944, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

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142



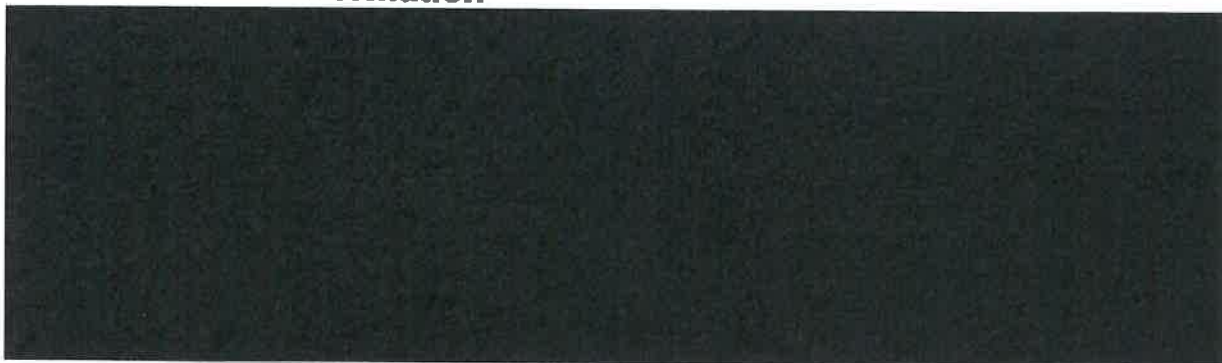
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): **Do** / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

This application is inconsistent with the General Policy for National Parks Policy 9(d)

9(d) Any application for a concession or an authorisation to establish accommodation and related facilities in a place, or to extend or add to an existing structure or facility, should meet the following criteria:

i) the accommodation or related facility cannot reasonably be located outside the national park; and

ii) it cannot reasonably be built elsewhere in the national park where the potential adverse effects would be significantly less; and

iii) the applicant cannot reasonably use or share an existing structure or facility.



143

My submission is [include the reasons for your views]:

This type of private commercial development could easily be located outside the National Park on privately owned land. Such private commercial developments have the potential to result in adverse environmental effects inside National Parks set aside for the preservation of indigenous species, habitats, ecosystems and natural features. It would be best to encourage such development outside of specially protected areas like the Eglinton River Valley. Granting of consent for this development is the thin end of the wedge for New Zealand's National Parks by paving the way for all kinds of development within National Parks, sending the wrong signal to developers and should therefore be declined.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Please DECLINE this application in its entirety.

G. Your Signature



20 July 2018

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

(24)

(143)

Lisa Wheeler

From: [REDACTED]

Sent:

Saturday, 21 July 2018 7:32 p.m.

To:

DNSubmissions

Subject:

opposition to the Path NZ Limited Concession application to DOC, protect our open spectacular landscapes from inappropriate commercial private developments

Director-General
Department of Conservation
PO Box 5244
Moray Place
Dunedin 9058

Level 1, John Wickliffe House
265 Princes Street
Dunedin 9016

Attention: Lisa Wheeler, Permissions Advisor

Tena koutou

Thank you for the opportunity to make a submission so that together we can achieve sound environmental and recreational outcomes, and protect the public interest in our beautiful National Parks. I am a regular visitor to this area of Fiordland.

I strongly oppose the Path NZ Limited Concession application to DOC for a lease and licence to build and operate a commercial structure in Fiordland National Park. This is completely inappropriate and should be declined in its entirety.

My contact details are:



This application

- conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry
- directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for



- Such exclusive use is not consistent with our National Parks Act; it appropriates public resources for private benefit. There is also no need, which the Fiordland National Park Management Plan recognises by preferring new visitor facilities to be established at existing modified sites.

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Note: Include pages two and three of this form with your response to DOC. Do not include page one.

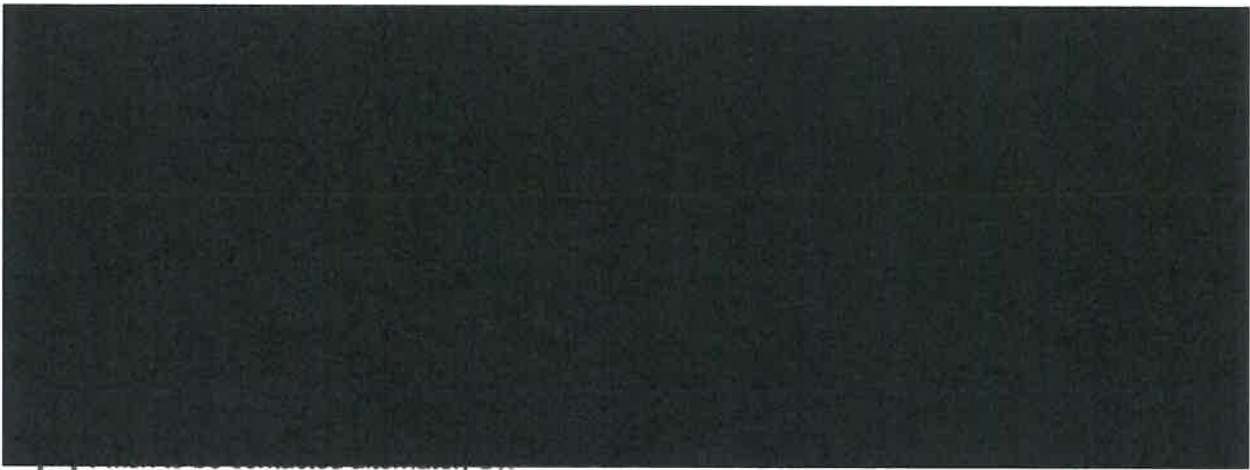
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) ~~Support~~ / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): ~~Do~~ / ~~Do Not~~-wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

Precedent

(145)

Location
Experience
De Congestion
Pricing

My submission is [include the reasons for your views]:

The upper Eglinton and Hollyford valleys are unique for the spectacular nature of their scenery. They are especially undeveloped (apart from the road) lack of exclusive commercial exploitation.

This is a precious asset for New Zealand, and we need policy to protect this one remaining exemplar.

The only other minor commercial developments are legacies predating the Fiordland Management Plan.

Before any precedent setting application of this scale is approved, we need a policy for management of the valley, rather than incremental development, and a policy for its place in the national context.

The location 25km inside the park is of relatively small value for convenience or exploitation, so the main amenity being consumed is the unspoilt nature of the valley and its views. DOC needs a well researched basis for charging for commercial use of this asset before leases are granted.

Other developments, such as active travel sections, would more cost effectively add greater value to a wider range of visitors to the valley.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The site should be moved outside the National Park.

142

45

G. Your Signature



2018 jul 20 _____
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor

142

145

Submission in opposition to

path-new-zealand-limited-concession-application

by



I oppose the application for the following reasons:

National Precedent

- The upper Eglinton and Hollyford valleys are unique for the spectacular nature of their scenery.
- A distinguishing feature of the valley with its spectacular natural undeveloped (apart from the road) state is its lack of exclusive commercial exploitation.
- Taken in the context of roads through national parks, of which this is the most spectacular, with the proposed hotel we will have lost the spectrum of experiences from developed to undeveloped or exploited to unexploited.
- There are many valleys with similar developments to the Hotel proposed for the Eglinton, so this will compromise the unique experience the Eglinton still offers.
- New Zealand will have lost a key distinguishing asset.
- We must decide if we want all roads to suffer incremental development or whether we should have a strategic plan that maintains a spectrum of development in which at least one exemplar of an undeveloped road environment is kept.
- This application needs to be considered in a national context, not just in terms of short term pressures on the valley.

Precedent for the valley

- The application would set a precedent for the valley.
- The only extant permanent developments are legacies predating the Fiordland Management Plan (FMP). Two are modestly commercial. Homer hut is non commercial and part of the fabric of New Zealand's genuine out-door culture.
- If this road is developed incrementally, and at each stage the next development is regarded as making a negligible marginal impact on the valley, we will wake up to a cumulative transformation that has lost forever the unique distinguishing feature of the valley.
- Before stumbling into the first such lease under the FMP there should be definitive criteria to distinguish it from subsequent applications, so as not to prejudice one against the other.
- So the first permanent non legacy commercial development in the Eglinton valley, should be declined before an overall strategy for managing coat tailing applications is established.

Experience of the Milford Highway

- The application emphasizes the value of experience offered. A very few people (40 beds) will enjoy this exclusive comfortable packaging of the valley in comparison with the total number through the valley.
- A far greater number of visitors could get a more intense experience from the Eglinton and Upper Hollyford valleys if walking and cycling tracks were established along the valley. One of the first

152

165

sections should be along the very section of the valley where the Hotel is to be sited. It is of paramount importance that this development with its exclusive occupation not jeopardize these possibilities.

- The Eglinton and Upper Hollyford valleys should be one of the nations highest priorities for active travel experience.

Congestion

Any decongestion is negligible in the scale of 200000 vehicles per year and will be compromised by its service traffic.

Location

The site is approximately 25km inside the park. Most of the walks and activities radiating from the hotel will be reached by vehicle. The lower Eglinton is the least congested section of the Milford Highway, so placing the hotel outside this conservation land would not have a big impact on traffic. Requiring the development to respect the park boundary and not create a precedent setting intrusion, would be preferable.

Pricing public assets

If the amenity of the views is the prime advantage of the location, then this amenity must be properly priced. Until DOC has a systematic method of valuing and pricing such amenities there should be a moratorium on such new exclusive leases.



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ŌTEPOTI / DUNEDIN OFFICE

**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

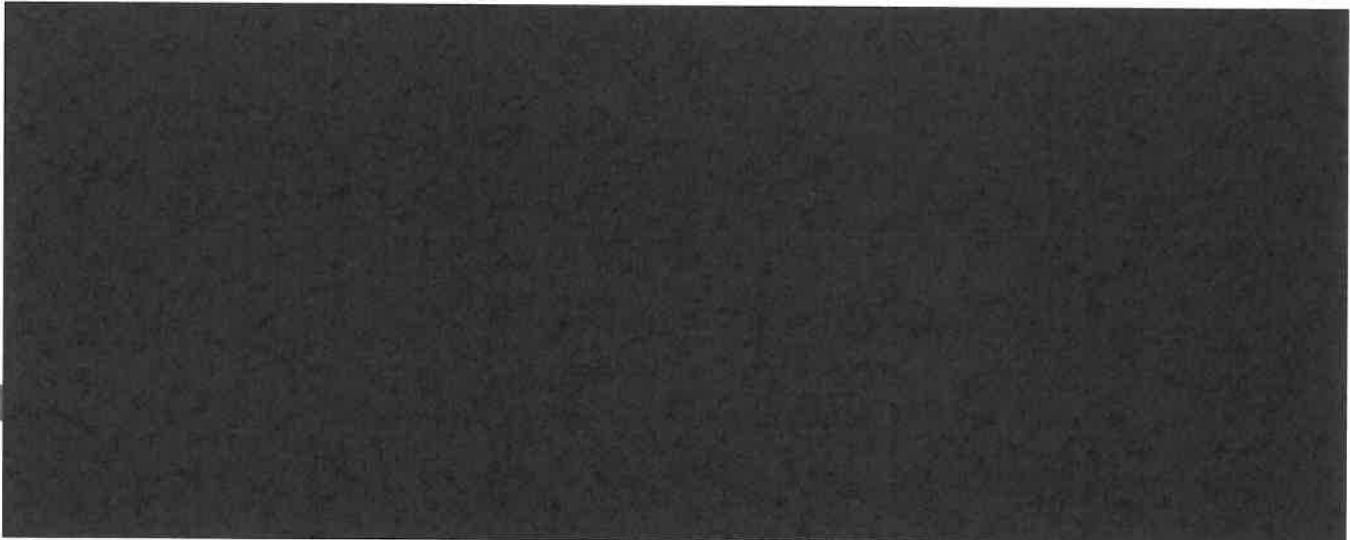
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

146

146

The entire proposal.

My submission is [include the reasons for your views]:

This part of NZ is beautiful and it's tiring to see commercialism sliding into it. The proposal

- conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry
- directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use
- is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road, (section 5.3.9.2 – 13 page 176)

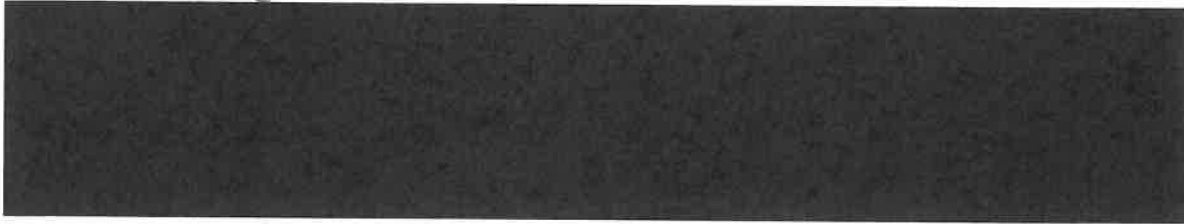
What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

That it be declined and this tiny piece of the planet be left alone from development like this.

146

146

G. Your Signature



16 July 2018

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

146

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64177-ACC – Path New Zealand Limited

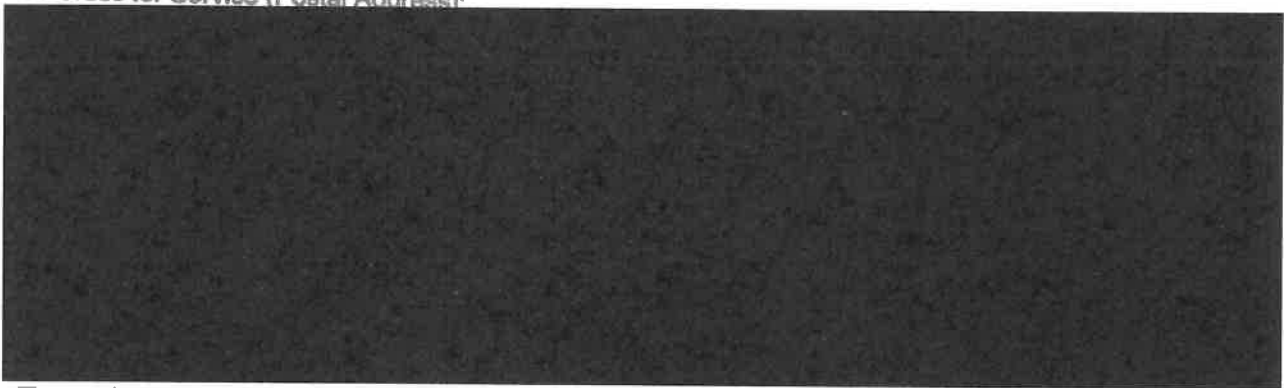
B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):
Phil Cowley

Address for Service (Postal Address):



D. Statement of Support/Opposition

I (circle one) Oppose this Application.

E. Hearing Request

I (circle one): Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

(5/1)

(147)

The entire proposal.

My submission is [include the reasons for your views]:

This part of NZ is beautiful and it's tiring to see commercialism sliding into it. The proposal

- conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry
- directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use
- is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road; (section 5.3.9.2 – 13 page 176)

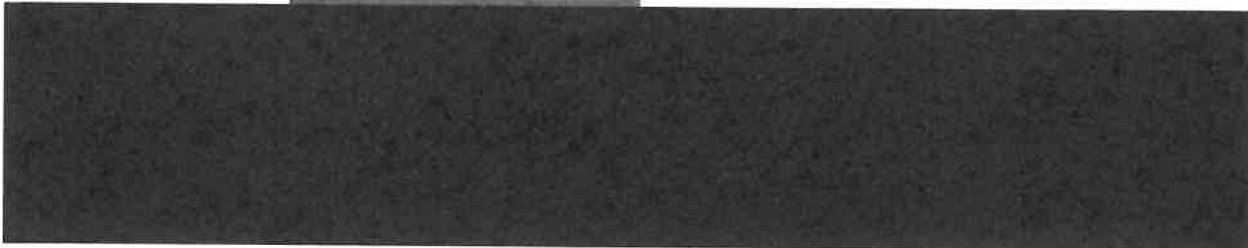
What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

That it be declined and this tiny piece of the planet be left alone from development like this.

(S.N.)

(147)

G. Your Signature



16 July 2018

Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

(147)

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RECEIVED
23 JUL 2018
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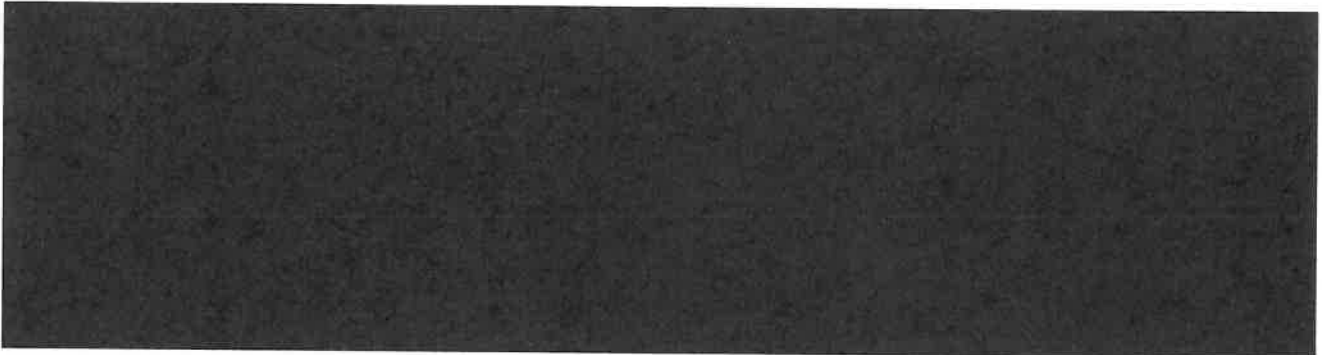
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are: 

148

148

My submission is [include the reasons for your views]:

I oppose this submission because:
I am concerned at the 'situation' I hear of and read about in the media that have already eroded our DOC - Public Land for what I see as 'commercial' gain which in my opinion is totally against the intention of what public land represents. It is for economic gain and of no benefit to almost all NZ's.
If we don't stop this proposal and subsequent proposals, I feel we are failing in our duty and our responsibility to future generations - our grand children and their children.

Please take this submission very seriously.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I wish this proposal to be dismissed in its entirety - - AND any future proposals on DOC - Public Land to get the same treatment.

G. Your Signature



Date 17.7.2018

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

148

148

18 JUL 2018
18 JUL 2018



18 TH JULY 2018

DEPARTMENT OF CONSERVATION
TE ANAU

RE: PROPOSED ACCOMMODATION COMPLEX
IN FORDLAND NATIONAL PARK.

I BELIEVE THAT THIS TYPE OF COMMERCIAL
DEVELOPMENT IS TOTALLY INAPPROPRIATE
WITH THE BOUNDARIES OF A NATIONAL PARK.

I WOULD WELCOME THE OPPORTUNITY TO
SPEAK TO THIS SUBMISSION.

REGARDS



149

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RECEIVED
23 JUL 2018
ŌTEPOTI / DUNEDIN OFFICE

Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

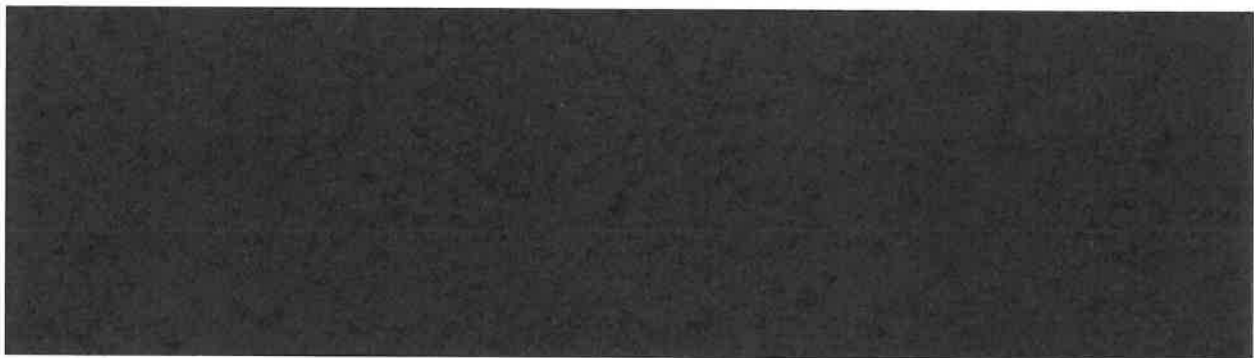
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

120

150

My submission is [include the reasons for your views]: THE PROPOSAL TO ALLOW ACCOMMODATION FACILITIES IN THE EGLINGTON VALLEY IS THE TWIN EDGE OF THE WEDGE THAT WILL HAVE A SUBSTANTIAL EFFECT ~~ON~~ A NEGATIVE EFFECT ON CONSERVATION VALUES OF FIORDLAND
ALREADY THESE VALUES HAVE BEEN COMPROMISED WITH THE BUILDING OF AN UGLY & GROTESQUE EDIFICE BUILT ON THE FORESHORE OF MILFORD SOUND
IF WE ARE TO RETAIN FIORDLAND NATIONAL PARK AS A DESIRED DESTINATION THEN THE CORE NATURAL VALUES MUST BE PROTECTED FROM DEGRADATION OF THE NATURAL
NO MORE DESTRUCTION OF OUR NATIONAL PARKS !

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

THIS APPLICATION TO BUILD THIS FACILITY SHOULD BE DISMISSED AS QUICKLY AS POSSIBLE - TO GIVE IT A LENGTHY CONSIDERATION ONLY ENCOURAGES THE APPLICANTS INTO THINKING THAT SUCH A FACILITY COULD BE POSSIBLE

G. Your Signature



17 JULY 2018
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor



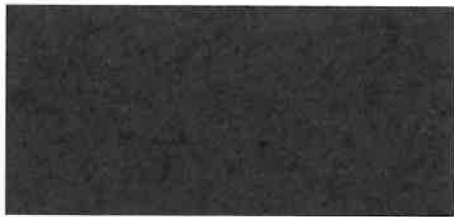
Attention Lisa Wheeler

Permissions Advisor
Department of Conservation
PO Box 5244
Moray Place
Dunedin

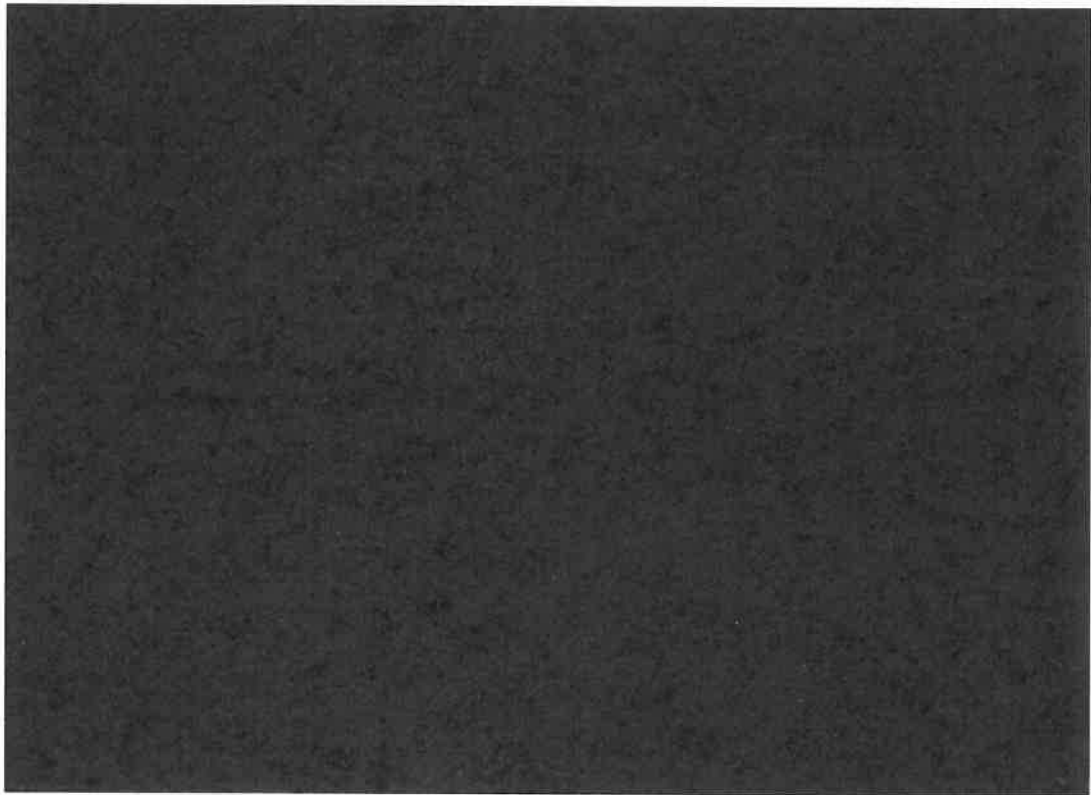


20th July 2018

I have tried three times to e mail my submission re Path NZ to DNSubmissions@doc.govt and have had them refused due to some 550 limit on your mailbox. Two were before the cut-off date and time. Details below. Consequently I have posted it. I hope it is accepted.



Failures to accept my emailed submission



121

151



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Opposition

Oppose this Application.

E. Hearing Request

Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

The building of commercial facilities in the Eglinton Valley within Fiordland National Park

121

157

My submission is [include the reasons for your views]:

That this concession not be granted. Such an activity is totally inappropriate in a National Park and virtually amounts to the privatisation of this part of the Park. This 'development' would greatly degrade the natural environment and is contrary to the purpose of having this area in the National Park in the first place. Fiordland National Park has World Heritage status and proposals such as this can only threaten this important recognition.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

That this application to build in the Eglinton Valley in Fiordland National Park be refused.

G. Your Signature



Date

19/7/2018

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor



Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

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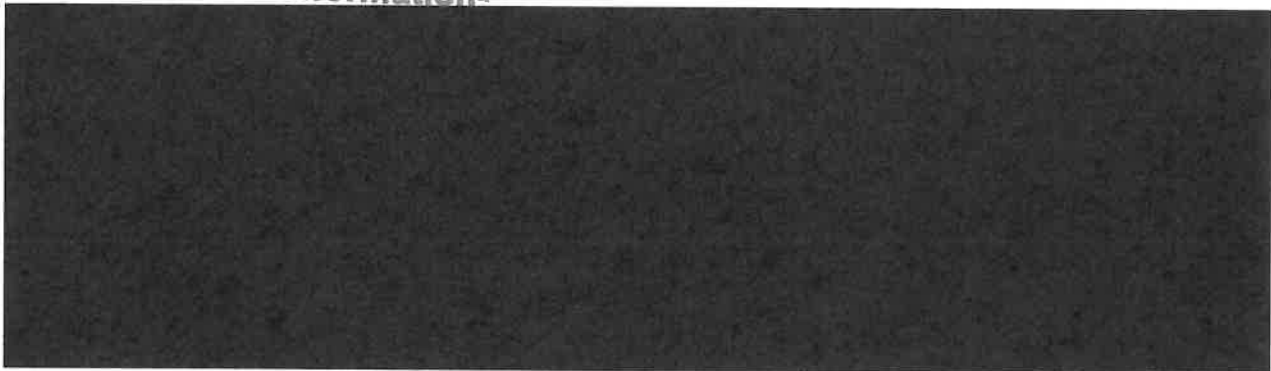
A. Permission Application Number and Name of Applicant

64177-ACC - Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglington Valley, Fiordland National Park

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do Do Not wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

NO PRIVATE ENTERPRISE SHOULD BE IN FIORDLAND NATIONAL PARK

125

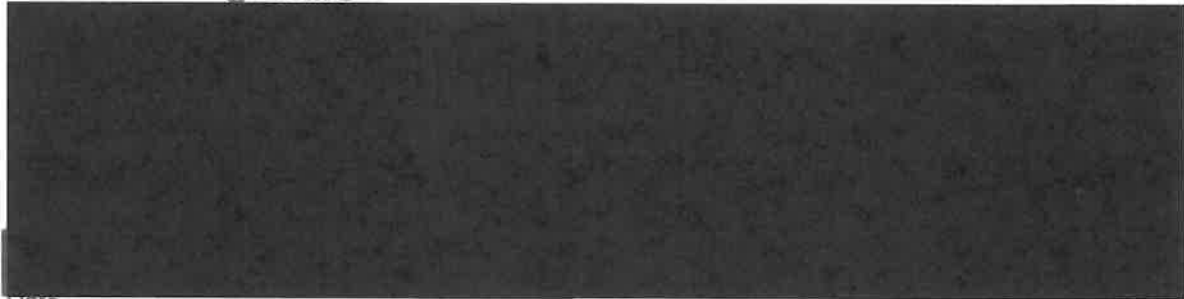
152

My submission is [include the reasons for your views]:

IF THIS application is allowed it will SET a precedent for anyone to set up in National parks, which belong to all NEW ZEALANDERS Department of Conservation are only the appointed caretakers and should not be able to consent this on any application in future.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

G. Your Signature



Date 23 July 2018

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058. Attention: Lisa Wheeler, Permissions Advisor

125

152

Lisa Wheeler

From: [REDACTED]
Sent: Monday, 23 July 2018 11:03 a.m.
To: DNSubmissions
Subject: 64177-ACC – Path New Zealand Limited Submission

Director-General
Department of Conservation
PO Box 5244
Moray Place
Dunedin 9058
Level 1, John Wickliffe House
265 Princes Street
Dunedin 9016
Attention: Lisa Wheeler, Permissions Advisor

Note: Include pages two and three of this form with your response to DOC. Do not include page one.

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

Accommodation Facilities and Associated Services, Eglinton Valley, Fiordland National Park

C. Submitter Information-

[REDACTED]

D. Statement of Support/Opposition

(21)

(153)

E. Hearing Request

I (circle one): Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

F. Submission

The specific parts of the application that this submission relates to are:

- That the application is in conflict with conservation policy, that it conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry
- And that it directly contradicts policies for accommodation in section 9 of the General Policy for National Parks, (GPNP) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road, (section 5.3.9.2 -- 13 page 176)

My submission is [include the reasons for your views]:

That the application be rejected in its entirety.

The applicants have stated that commercial development exists inside the park, and have attempted to use this as a precedent for further development inside the park, but I submit that the Department reject this line of reason and maintain the park, part of the UNESCO recognised Te Wāhipounamu - South West New Zealand World Heritage Area, in its proper state.

123

153

G. Your Signature



Date

Mon 23rd July 2018

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 5244, Moray Place, Dunedin 9058.
Attention: Lisa Wheeler, Permissions Advisor

(153)

