ST MARGARET'S COLLEGE
JUNIOR, MIDDLE & SENIOR SCHOOL

DIANA PATCHETT, EXECUTIVE PRINCIPAL

9 July 2019

The Permissions Team
Department of Conservation
Private Bag 4715
Christchurch Mail Centre
Christchurch 8140

Dear Permissions Team

Re: St Margaret's College applications for a Concession Lease and Easement for continued operation of Paterson Lodge within Arthur's Pass National Park

Please see attached application forms for your consideration:
Form 1a - Applicant Information
Form 3b – Concession Application for private facility/structures
Form 3c – Concession Application Easements

Please note that the application for a water supply easement is submitted jointly with Christchurch Boys High School.

Given the public good provided by St Margaret's College in educating girls and young women to live and lead and its not-for-profit operation, the College requests a waiver of the application fee, the annual fees and rents applicable to Paterson Lodge. Please refer to the attached justification for requesting a waiver of application and annual fees.

The Trust Board and College leadership group have a duty of care to all users of the Lodge and must carefully manage all the risks to health and safety. We are very concerned about the risks posed by:

(a) 4WD vehicles traversing the proposed lease area and the bordering terrace banks, and
(b) Other persons camping very close to the Lodge and using the outdoor toilets and water supply.

Vehicle traffic and camping pose real safety risks to students, teachers and families using the Lodge. Consequently, selective exclusive possession for building use, vehicle access and camping is being sought.

The College has cooperated with Christchurch Boys High School and consulted the Department of Conservation staff and Ngāi Tahu iwi representatives in preparing these

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applications with the aim of meeting expectations on outdoor and cultural heritage education and responsible operation of the Lodge within this wonderful National Park.

We look forward to your favourable consideration of our application.

Kind regards

Yours sincerely

Diana Patchett
Executive Principal

Department of Conservation
Te Papa Atawhai

Applicant Information Form 1a
Notified or Non-notified process

We recommend that you contact your usual permissions advisor, or the appropriate Department of Conservation Office to discuss the application prior to completing the application forms - see appendix for contact details.

Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form must be completed for all longer term applications (ie not one-off applications), then please fill in and attach the form(s) for the activities you wish to undertake. If extra space is required for answering please attach and label according to the relevant section.

Once you have filled in your application form, please complete this checklist to ensure that all components of your application form are complete. This will help prevent any possible delays in the processing of your application:

- ☐ Legal status registration number (if not an individual)
- ☐ Written testimonials (if required)
- ☐ Written consultations (if applicable)
- ☐ All appropriate activity application forms - for concessions we require the applicant information form **and** relevant activity form(s)
- ☐ Supporting evidence for Environmental Impact Assessment (if required)
- ☐ Supporting information and detail including maps, site plans, building plans as required in activity forms. **Note some applications require GPS Co-ordinates**
- ☐ Supporting evidence for details of activity forms
- ☐ Have you read the section regarding the liability of the applicant for payment of fees?
- ☐ **Have you signed your application?**

All efforts in putting together a detailed application are greatly appreciated and will allow the Department to effectively and efficiently process your application.

A. Applicant Details

Applicant Name (full name of registered company or individual) ST. MARGARET'S COLLEGE TRUST BOARD

Legal Status of applicant (tick) **Individual** **Registered Company** **Trust** **Incorporated Society**

Other (please specify full details) Charitable Trust

Please supply the company, trust or incorporated society registration number: Charities Commission Registration #: CC25547 NZBN #9429042847984

If an individual please supply your date of birth (this is a unique identifier for you):

Trading Name (if different from Applicant name) ST. MARGARET'S COLLEGE

Postal Address P.O. Box 25094
Christchurch

Street Address (if different from Postal Address) Winchester Street
Merivale, 8014
Christchurch

Registered Office of Company or Incorporated Society (if applicable) NA

Phone **Website** www.stmargarets.school.nz

Contact Person and role Fionn Moore, General Manager

Phone [redacted] **Cell Phone** [redacted]

Email fionn.moore@st.margarets.school.nz

Contact Person and role Michael Patchett

Phone **Cell Phone** [redacted]

Email [redacted]

B. Activities applied for

Please fill in all the forms that are applicable in order to cover all the activities the applicant wishes to undertake on public conservation land. Please tick below the forms that have been completed, and attach.

ACTIVITY		FORM	✓
Grazing		2a	
Land use:			
A.	Tenanting and/or using existing DOC facility/structure	3a	
B.	Use of public conservation land for private/commercial facility/structure	3b	✓
C.	Easements across public conservation land including right of way, stock access, convey electricity, drain sewerage, waterpipes etc	3c	✓
Guiding/Tourism/Recreation:			
A.	Walking/Hiking/Tramping/Hunting/Fishing/Horses/4WD activities etc	4a	
B.	Watercraft activities	4b	
C.	Aircraft activities	4c	
Filming		5a	
Sporting Events		6a	
Other (activities that may not be sufficiently covered in the above forms)		7a	

C. Background Experience of Applicant

Please provide relevant information relating to the applicant's ability to carry out the proposed activity (e.g. details of previous concessions, membership of professional organisations and relevant qualifications). Attach details and label Attachment 1a:C.

St Margaret's College (SMC) in Christchurch has 110 year history of educating girls and young women in a wide range of academic, sports, arts and outdoor activities.

St Margaret's College was granted a Hut Permit in 1969 by Arthurs Pass National Park Board, per SMC Board Minutes. No copy of the Hut Permit is available from DOC or SMC. File records lost in the 2011 earthquake that required the College buildings to be demolished and rebuilt.

Duke of Edinburgh outdoor tramping by students and student groups.

SMC Alpine Tramping Club activities within the National Park

Statutory Liability cover - up to $1m, Public Liability cover- up to $5m. All SMC Vehicles are insured

See Attachment 1a: C

Has the Applicant or any of the company directors, trustees, partners, or anyone involved with the Application been convicted of any offence? Does the Applicant or any of the company directors, trustees,

partners, or anyone involved with the Application have any current criminal charges pending before the court? If yes, please supply details.

No

D. Testimonials

Please attach two written testimonials, together with the names, occupations, addresses and phone numbers of two people who will vouch for the proficiency of the applicant in the proposed activity. At least one testimonial should contain information in relation to the financial viability and standing of the applicant. These testimonials are to be labelled Attachment 1a:D.

E. Consultation Undertaken

Most applications require consultation with whanau/hapu/iwi (local Maori), and other interested parties. Please read the information on the DOC website and contact the nearest Department of Conservation office to discuss what is required. Written expert views, advice or opinions concerning your proposal may also be attached to support the application. Attach any proof of consultation to the application and label Attachment 1a:E.

F. Insurance

Concessionaires are required to indemnify the Minister against any claims or liabilities arising from their actions. If this application is approved, the applicant will be required to hold Public Liability, and possibly Statutory Liability and/or vehicle insurance. The level of cover will depend on the nature of the activity. Please contact the nearest Department of Conservation office to discuss what is required.

G. Public Notification

Some activities and/or types of concession applications require public notification if the Department forms an intent to grant the concession. This increases the time and cost of processing the concession. The usual circumstances when public notification is required are thus:

- The Application is for exclusive use of public conservation land (ie a lease);
- The Application is for a licence for a term longer than 10 years;
- Other concessions do not require public notification unless the adverse effects of the activity are such that it is required.

A permissions advisor can advise you as to the type of concession your activity requires and whether or not it needs notification.

H. Fees and costs

Processing Fees:

Section 60B of the Conservation Act contains the statutory provisions regarding processing fees.

The Department recovers all direct and indirect costs to process a concession application from Applicants regardless of whether the application is approved or declined. The cost of processing a concession depends on whether the application needs to be notified or not (see Public Notification section above), and/or whether the application is a standard application or is complicated/complex.

The cost of processing a standard non-notified concession is likely to be between **$2065 and $2565 plus GST**. If the application is assessed as complex, covers multiple regions, or includes more than 20 individual locations, this fee is likely to be higher. The Department will send an estimate of costs to the Applicant once the application has been assessed.

The cost of processing a standard notified concession is likely to be between **$3500 and $5500 plus GST**. This fee is likely to be higher if the application is assessed as complex, covers multiple regions, or if a hearing is required. The Department will send an estimate of costs to the Applicant once the application has been assessed. The Department will re-estimate the cost and provide this to the Applicant if further costs are likely due to significant public interest during the public notification process.

Applicants are entitled to request an estimate of costs at any point but the Department may impose a charge for preparing such an estimate. Estimates are not binding.

The Department will ordinarily invoice the Applicant for processing fees after a decision has been made on the application but in some cases interim invoices will be issued. If at any stage an application is withdrawn the Department shall invoice the Applicant for the costs incurred by the Department up to that point. Applicants are required to pay the processing fees within 28 days of receiving an invoice. The Director-General is entitled to recover any unpaid fees as a debt.

The Director-General of Conservation has discretion to reduce or waive processing fees. If your application is for landing aircraft for personal recreational use you may be eligible for a reduction of 50% of the processing fee.

The Department may obtain further information either from the applicant or from any other relevant source in order to process the application. The applicant will be advised of any information obtained from other sources. The cost of obtaining such information will be charged to and recovered from the applicant. The applicant will be informed as soon as practicable from receipt of the application if further information is required before this application form can be fully processed by the Department.

Ongoing Fees:

If your application is approved, you will also be required to pay annual fees throughout your concession. These are:

- Annual management fee to cover administration time; and/or
- Monitoring fee (if required) to cover the cost of monitoring the effects of your activity; and/or
- Activity fee per head (if a recreation concession), or a minimum fee per year; and/or
- Annual rental (if a land use concession eg lease)

Please contact the nearest Department of Conservation office to discuss the applicable fee and processing timeframe for the application.

See Attachment 1a:H for a request to waiver fees.

Terms and Conditions for an Account with the Department of Conservation:

Have you held an account with the Department before? (Please tick) Yes No No

If yes, under what name:

1. I/We agree that the Department of Conservation can provide my details to the Department's Credit Checking Agency to enable it to conduct a full credit check.
2. I/We agree that any change which affects the trading address, legal entity, structure of management or control of the applicant's company (as detailed in this application) will be notified in writing to the Department of Conservation within 7 days of that change becoming effective.
3. I/We agree to notify the Department of Conservation of any disputed charges within 14 days of the date of the invoice.
4. I/We agree to fully pay the Department of Conservation for any invoice received on or before the due date.
5. I/We agree to pay all costs incurred (including interest, legal costs and debt recovery fees) to recover any money owing on this account.
6. I/We agree that the credit account provided by the Department of Conservation may be withdrawn by the Department of Conservation, if any terms and conditions of the credit account are not met.
7. I/We agree that the Department of Conservation can provide my details to the Department's Debt Collection Agency in the event of non-payment of payable fees.

Declaration

I certify that the information provided on this application form and all attached additional forms and information is to the best of my knowledge true and correct.

Note: The Minister can vary any concession granted if the information given in this application contains inaccuracies.

Signature (Applicant) **Date** 27/07/19

Signature (Witness) **Date** 27/07/19

Witness Name MIKE PATCHETT

Witness Address [redacted]

This application is made pursuant to Sections 17R and 17S of the Conservation Act 1987 [and (where applicable) Section 49 of the National Parks Act 1980/Section 59A of the Reserves Act 1977].

Applicants should familiarise themselves with the relevant provisions of the Conservation Act 1987, the Reserves Act 1977 and the National Parks Act 1980 relating to concessions.

Once the application is complete, the Minister has 20 days within which to advise the applicant whether the application is declined on the grounds that the application does not comply with or is inconsistent with the provisions of the Act or any relevant Conservation Management Strategy or Conservation Management Plan. If the Minister does not so advise the applicant the application will be processed in accordance with Section 17T of the Conservation Act 1987.

The purpose of collecting this information is to enable the Department to process your application. The Department will not use this information for any reason not related to that purpose.

Applicants should be aware that provisions of the Official Information Act might require that some or all information in this application be publicly released.

For Departmental use

Credit check undertaken

Comments :

Signed	**Name**
Approved (Tier 4 manager or above)	**Name**

Appendix 1: Who to contact?

If you have a query relating to a permit or concession the offices below specialise in the following topics. For queries relating to topics not listed below contact the office closest to where you are based.

Hamilton

Contact our Hamilton office for:

- agriculture, beehive, vehicle, ski field and grazing concessions

Permissions Team
Private Bag 3072
Hamilton 3240
Ph +64 27 200 9648
Email: permissionshamilton@doc.govt.nz

Christchurch

Contact our Christchurch office for:

- Retail, ski field, access/easements, Wild Animal Recovery Operations (WARO) and helihunting concessions
- Sounds Foreshore authorisations and all permits relating to Marine Mammals

Permissions Advisor (Support)
Private Bag 4715
Christchurch Mail Centre
Christchurch 8140
Ph +64 3 371 3700
Email: permissionschristchurch@doc.govt.nz

Hokitika

Contact our Hokitika office for:

- Events, vehicle, boating, access/easements, grazing and extraction of materials concessions
- Mining and access arrangements.

Permissions Advisor (Support)
Private Bag 701
Hokitika 7842
Ph +64 3 756 9117
Email: permissionshokitika@doc.govt.nz

Dunedin

Contact our Dunedin office for:

- Aircraft (other than helihunting and WARO), boating, ski field, access/easement and grazing concessions.

Permissions Advisor (Support)
PO Box 5244
Dunedin 9058
Ph +64 3 477 0677
Email: permissionsdunedin@doc.govt.nz

Attachment 1a:C

Background Experience of Applicant

St Margaret's College was established in 1910 on the initiative of Bishop Julius of the Anglican Diocese of Christchurch. This non-government girls only school is operated as a not-for-profit leading and high performing education institution. St Margaret's College is the only girls' school in the South Island of New Zealand to offer the International Baccalaureate Diploma in addition to NCEA. It is divided into Junior, Middle and Senior schools.

With a commitment to holistic education, balancing academic excellence with a multitude of co-curricular opportunities, St Margaret's College encourages students and staff to discover their passions and be the very best they can be. A St Margaret's College education is founded on Anglican values with a focus on service and wellbeing and offered within a modern school environment promoting diversity, innovation and sustainability. Academic, social, physical and spiritual programmes, with opportunities in high performance sport, cultural pursuits, outdoor education and service learning, ensure our graduates step into the world as confident young women prepared to make a positive change.

St Margaret's College has Paterson Lodge within Arthur's Pass National Park, on the northern second terrace of the Waimakariri and Hawdon Rivers. A Hut Permit was issued in 1969 by the then National Park Board. It was opened in 1970 and has been used and enjoyed by students, staff and their families for many years. Groups of College students with teachers have utilised the Lodge for outdoor education, mountain safety and tramping experiences. A College Tramping Club enabled students and their families to utilise the Lodge as a base for tramping through the National Park.

While use of the Lodge wained in recent years as the College focused of maintaining quality education and rebuilding the College post-earthquake, the Trust Board and Parents and Friends Association strongly support re-establishing frequent student, teacher and families use of the lodge for a range of outdoors education and recreation activities. The College's programs through the Duke of Edinburgh and Rite Journey and a revitalised Tramping Club will ensure frequent use of the Lodge.

Attachment 1a.E

Consultations

Department of Conservation

St Margaret's College representatives have consulted the following DoC staff regarding preparation of these applications:

Chris Stewart - Senior Ranger, Arthur's Pass National Park

Merrilyn Grey – Ranger Community, Christchurch

Karina Brennan-Evans Christchurch

Ngai Tahu

Report on Discussions Between St Margaret's College/Christchurch Boys High School

Kia Ora Koutou,

I have much pleasure in providing a summary of discussions that I personally have had with the local Iwi (Ngai Tahu) and hapu (Te Ngai Tuahuriri Runaka) in support of the Concession and Easement applications (Department of Conservation) that are being made by St Margaret's College- Paterson Lodge- (SMC) and Christchurch Boys High School-Kidson House- (CBHS) located in the Arthurs Pass National Park.

To this end, through my Ngai Tahu affiliation, I have spoken with the Chairman of Te Ngai Tuahuriri Runaka (Arapata Rueben) to explain the significance and importance to both SMC and CBHS. Arapata who is not only the Chairman of the Runaka but also holds the following positions in:

1.Chairman Christchurch/West Melton Water Zone Committee which is responsible for the zone implementation programme for the Canterbury Water Management Strategy and the Partnership between the Christchurch City Council/Selwyn District Council/Environment Canterbury.

2.Trustee for the Mana Waitaha Trust which is responsible for change for the Maori Reserve 873 Tuahiwi within the Waimakariri District Council.

3.Kiwi Recovery Group established by the Department of Conservation in 1991.

Having met and discussed with Arapata the significance of these applications he has advised that the Concession Applications should be let to take its course through the process, which will be passed on to the appropriate section of Te Ngai Tuahuriri for consideration and discussion. During the course of my discussion with him, the suggestion of being involved with the Kiwi Recovery Group could prove beneficial to all interested parties including SMC and CBHS. The involvement of these two schools would also enhance a collaborative involvement with the local Iwi and Hapu. Further, the local Hapu may want to provide historical information that may be of significance to the SMC and CBHS.

The outcome of this meeting was very positive and would only enhance the development of

the outdoor education programmes proposed and the connection with Ngai Tahu and the local hapu Te Ngai Tuahuriri.

Nga Mihi Nui
Roger Wyeth
[redacted]

St Margaret's College Parents and Friends Association
The Parents and Friends Association has been briefed three times over the past 6 months on the use and condition of the Lodge and conducted a day trip to see for themselves. The group are very supportive of increasing student and family use of the Lodge and contributing to the refurbishment of the Lodge to make it more useful and comfortable for the users.

Concession Application
Form 3b – Private/commercial facility/structures

The Department recommends that you contact the Department of Conservation Office closest to where the activity is proposed to discuss the application prior to completing the application forms. Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form is to be used when the proposed activity is the building or use of any private or commercial facility or structure on public conservation land managed by the Department of Conservation. Examples may include lease of land to erect an information centre; authorisation to erect a weather station; or construct or lease a private/commercial campground or lodge. This form is to be completed in conjunction with either Applicant Information Form 1a (longer term concession) or Applicant Information Form 1b (one-off concession) as appropriate.

Please complete this application form, attach Form 1a or Form 1b, and any other applicable forms and information and send to permissions@doc.govt.nz. The Department will process the application and issue a concession if it is satisfied that the application meets all the requirements for granting a concession under the Conservation Act 1987.

If you require extra space for answering please attach and label according to the relevant section.

A. Description of Activity

Please describe the proposed activity in detail – where the site is located, please use NZTM GPS coordinates where possible, what you intend to use the building for, whether you intend to make any changes to the infrastructure.

Please include the name and status of the public conservation land, the size of the area for which you are applying and why this area has been chosen.

St Margaret's College in Christchurch established Paterson Lodge in 1970 with permission from the Arthur's Pass National Park Board as an outdoors Alpine educational and activities facility for the College students, staff and their families.

Paterson Lodge is located near the Hawdon Shelter and camping ground, on an upper terrace of the Waimakariri valley overlooking the Hawdon Flats Reserve. Refer to Attachment 3b:A1 for a map with GPS co-ordinates of the Lodge, Tenure and Access

College student groups and their teachers utilise the Lodge for a range of educational activities such as geography, science, biology, arts and alpine tramping, safety and skills development. Informal education sessions are conducted around the lodge and along the various tramping tracks. College student group tramping activities fulfil requirements of the Duke of Edinburgh awards program and other outdoor activity schemes.

Student families can utilise the Lodge for alpine tramping experiences and improve knowledge of the National Park values and mountain safety through the various educational posters and information available in the lodge and parental guidance and instruction. Teacher professional development activities are also conducted at the Lodge.

Alpine tramping safety courses are conducted for student groups by qualified professionals.

(Note: following the major Christchurch earthquakes in 2011, St Margaret's College focused on rebuilding the College and sustaining quality core education. Consequently, College use of the lodge declined significantly. However, the College is now committed to revitalising the strong use of the Lodge for educational purposes.)

B. Alternative sites considered

If your application is to **build, extend or add** to any permanent or temporary structures or facilities on public conservation land, please provide the following details:

- Could this structure or facility be reasonably located outside public conservation land? Provide details of other sites/areas considered.
- Could any potential adverse effects be significantly less (and/or different) in another conservation area or another part of the conservation area to which the application relates? Give details/reasons

There are no alternative sites for the existing Paterson Lodge. The Lodge has been in this location for 49 years.

This application is to permit the **continued** occupancy and educational use of Paterson Lodge and its supporting facilities, such as the long drop outside toilets, water supply tanks and pipeline, wood storage shed. The only proposed additions to the Lodge is a) a roof and sides cover to the existing concrete deck adjoining the Lodge and b) a secure gas cylinder storage cage attached to the side of the Lodge, c) a solar power unit for lighting the lodge with solar panels mounted on the roof and d) replacing the longdrop toilet block with 2-3 modern contained/pump-out toilets. These proposed

additions and replacements would not substantially change the existing footprint of the lodge and make the facility more useful and comfortable for students, staff and families. All requirements of the Selwyn District Council for these minor upgrades would be met. Any other extensions or additions for the Paterson Lodge facilities over time would require consent of DoC and the Selwyn District Council.

C. Larger area

Is the size of the area you are applying for **larger** than the structure/facility **YES**

If **yes**, please detail the size difference in the box below, and answer the following 3 questions, if **no** please go on to the next section:

The proposed Concession Lease area is around 1.0 ha that encompasses the Lodge, outside longdrop toilet block, greywater and sewage water soakaway areas, a woodshed, three water storage tanks and pipeline to the Lodge, a stone monument, a footpath up the terrace bank and a car parking area.

Is this necessary for safety or security purposes? **YES**

Is this necessary as an integral part of the activity? **YES**

Is this essential to carrying on the activity? **YES**

If the answer to any of the above is yes, please provide details and attach supporting evidence if necessary and label Attachment 3b:C.

The Paterson Lodge facilities referred to above are an integrated system of vehicle parking, access footpath, accommodation, water and wood fuel supply and sewerage system that essentially supports the educational use of the lodge by student groups, teaching staff and families.

D. Exclusive possession

Do you believe you need **exclusive possession** of the public conservation land on which your structure/building is located, ie no one else can use the land during your use of it? **YES**
(Exclusive occupation requires a lease which requires public notification of the application)

If **yes**, please answer the following 3 questions, if no please go to the next section:

Is exclusive possession necessary to protect public safety? **YES**

Is exclusive possession necessary to protect physical security of the activity? **YES**

Is exclusive possession necessary for the competent operation of the activity? **YES**

If the answer to any of the above is yes, please provide details and attach supporting evidence if necessary and label Attachment 3b:D.

Exclusive possession is requested of the land on which the buildings occupy is necessary for accommodation and the physical security of the buildings and safety of the accommodated occupants. Selective exclusive possession is requested for safety reasons of the remaining area of the proposed Concession Lease for the purposes of vehicle access and camping. See attachment 3b.D for detailed justification. The public can walk through the lease area and are known to utilise the fresh water supply

and outside toilets of the Lodge.

E. Technical Specifications (for telecommunications sites only)

Frequencies on which the equipment is to operate

Power to be used (transmitter output)

Polarisation of the signal

Type of antennae

The likely portion of a 24 hour period that transmitting will occur

Heaviest period of use

F. Term

Please detail the length of the term sought (i.e. number of years or months) and why.

Note: An application for a concession for a period over 10 years must be publicly notified, an application for a concession up to 10 years will not be publicly notified unless the adverse effects of the activity are such that it is required, or if an exclusive interest in the land is required.

St Margaret's College requests the maximum term of 30 years for the Concession Lease with a right of renewal. The College intends to utilise this valuable outdoors educational facility for the long term future. Future generations of College students need to appreciate and help protect the wonderful natural values of Arthur's Pass National Park and acquire knowledge and understanding about safe alpine tramping.
The Paterson Lodge facility was established in 1970 and has been operational for 49 years.

G. Bulk fuel storage

Under the Hazardous Substances and New Organisms Act 1996 (HSNO Act) 'Bulk fuel storage' is considered to be any single container, stationary or mobile, used or unused, that has a capacity in excess of 250 litres of Class 3 fuel types. This includes petrol, diesel, aviation gasoline, kerosene and Jet A1. For more information on Hazardous Substances, go to: http:/www.business.govt.nz/worksafe/information-guidance/legal-framework/hsno-act-1996

Do you intend to store fuel in bulk on the land as part of the activity? **NO**

If you have answered yes, then please provide full details of how and where you intend to store the fuel, and label any attachments including plans, maps and/or photographs as Attachment 3b:G. If your concession application is approved you will be required to provide a copy of your HSNO compliance certification to the Department before you begin the activity.

H. Environmental Impact Assessment

This section is one of the most important factors that will determine the Department's decision on the application. Please answer in detail.

In column 1 please list all the locations of your proposal, please use NZTM GPS coordinates where possible. In column 2 list any special features of the environment or the recreation values of that area. Then in column 3 list any effects (positive or adverse) that your activity may have on the values or features in column 2. In column 4 list the ways you intend to mitigate, remedy or avoid any adverse effects noted in column 3. Please add extra information or supporting evidence as necessary and label Attachment 3b:H.

Refer to Steps 1 and 2 in your Guide to Environmental Impact Assessment to help you fill in this section.

Location on public conservation land	Special feature or value	Potential effects of your activity on the feature or value (positive or adverse)	Methods to remedy, mitigate or avoid any adverse effects identified
Arthur's Pass National Park, near the Hawdon Shelter and camp ground	Immense natural beauty, wonderful landscapes and rare flora and fauna.	Minimal impact on visual amenity of NP.	Lodge and support buildings paint colours blend into landscape colours
		Minimal damage to the plants by foot traffic	Educate students, staff and families and maintenance staff of the type, location and importance of the rare and threatened species. Avoid foot traffic in any specific locations known to have rare or threatened plant species.
Includes a vehicle access track across the adjoining Hawdon Flats Reserve	Mountain beech forest/Tawhairauriki	Minimal effect on forest caused by foot traffic along tracks. Introduce weeds.	Educate students, staff and families and maintenance staff of the type and importance of the beech forest species. Avoid foot traffic in any specific locations known to have rare or threatened plant species. Educate students, staff and families and maintenance staff of the importance of weed control by cleaning footware and vehicle tyres before coming to the Lodge. Participate in weed removal activities near the Lodge.
	River flats covered with native tussocks and exotic grasses and dotted with	Minimal effect on river flats caused by foot traffic along tracks and braided riverbed.	Educate students, staff and families of the type, location and importance of the river flats. Avoid foot traffic in any specific locations known to have rare or threatened plant

thorny grey matagouri schrubs, small herbs, cushion plants, mosses and lichens.		species.
	Minimise introduced weeds	Educate students, staff and families and maintenance staff of the importance of weed control by cleaning footware and vehicle tyres and underbelly before coming to the Lodge. Participate in DoC and community weed removal activities near the Lodge.
Rare birds include the Blue duck/who, Orange fronted Parakeet/kakariki, yellowhead/mohua, the rock wren/piwanuwau the great spotted Kiwi/roroa and the South Island kaka.	Minimal to no effect on these rare and more common birds	Educate students, staff and families and maintenance staff of the type, location and importance of the rare and threatened bird species. Avoid foot traffic in any specific locations known to have nesting sites of rare or threatened bird species. Within 3 years replace all lead-head roofing nails on the roofs of the Lodge and support buildings.
Other more common birds include the Kea, tomtit/miromiro, bellbird and NZ Falcon/karearea		Monitor and record bird life around Lodge and on tramps. Report to DoC any sighting of rare birds. Participate in rat, mouse and stoat control programs near the Lodge.
Other biodiversity, such as insects, reptiles and aquatic life	Minimal effect of other biodiversity	Educate students, staff and families and maintenance staff of the other biodiversity in the park and the need for protection.
	Vehicle access on existing tracks may damage grass cover and disturb the soil.	Restrict vehicle access direct to the lodge on existing tracks to service and maintenance vehicles and vehicles carrying supplies or disabled persons. Minimise vehicle traffic impact by providing a car parking area on the flat below the Lodge and footpath to the lodge.
	Minimise landscape disturbance from vehicle	Cooperate with DoC to improve vehicle access to the lodge along designated tracks and educate Lodge users to keep to one main track rather than use multiple tracks.

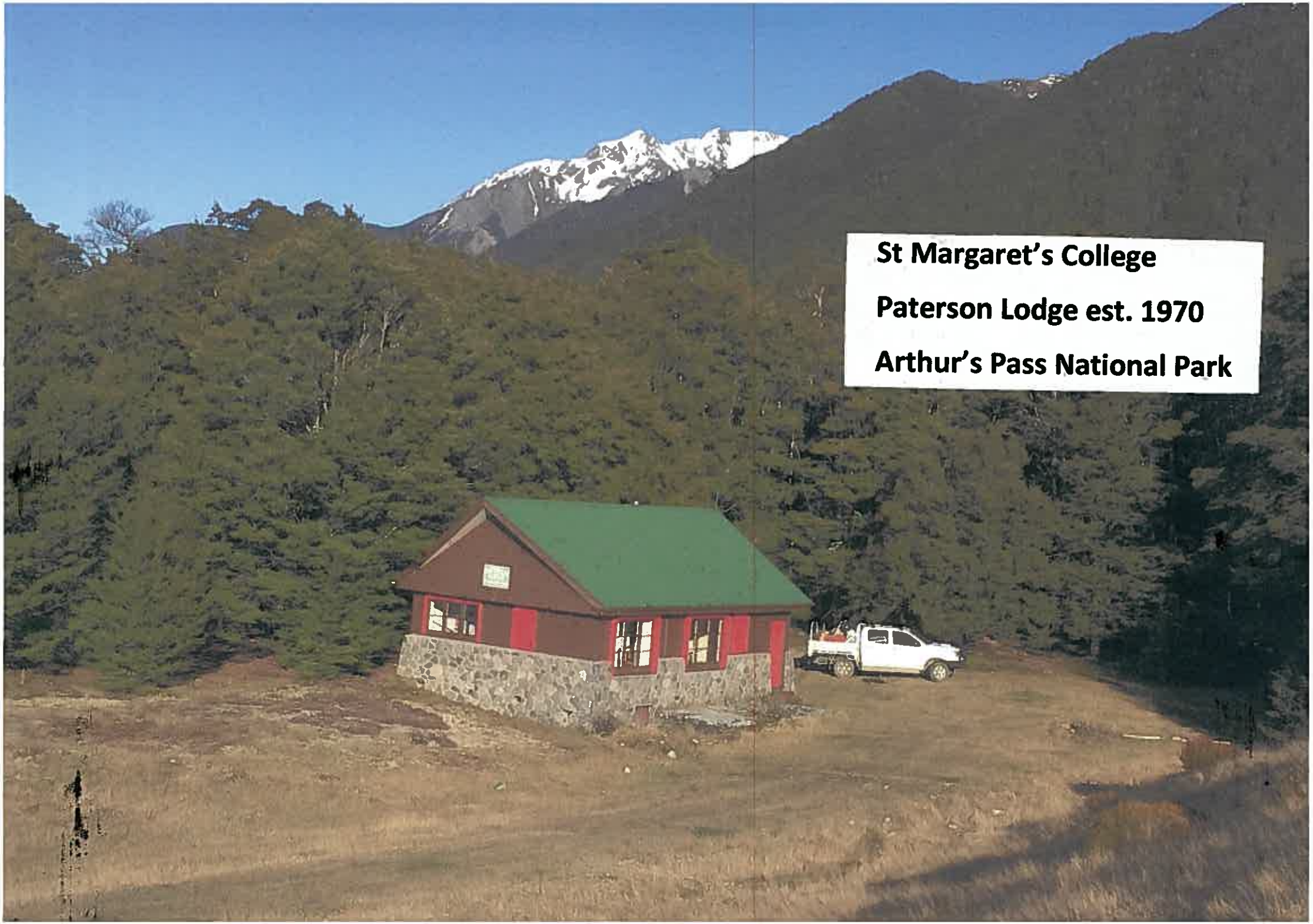
tracks to the Lodge.	
Rehabilitate illegal 4WD track scars up the terrace banks near the Lodge	Cooperate with DoC to rehabilitate landscape damage from 4WD traffic up/down the terrace banks near the Lodge. (note: damage not caused by Lodge users)
Rehabilitate a disused long drop pit.	Fill in a disused long drop pit near the Lodge and rehabilitate the small area to blend into the landscape.
Waste materials pollution of the land and waters near the lodge	All waste material such as food packaging and scraps and fire ash will be contained and taken away upon departure, i.e. no waste dumping on site. Grey water waste from the shower and kitchen area will be diverted to existing ground soakage pits. Sewage solid and liquid waste flows from a flush toilet and 4 combined land-drop toilets, will be contained and allowed to drain to existing ground soakage areas. (Note There are no signs that these existing soakage areas are overloaded or malfunctioning.) Within 6years SMC will upgrade the existing long-drop toilet block to a Wilderness style contained tank and routine pump-out system, similar to the types used by DoC.
Importing and storing fuel for the Lodge heating, enclosed and open fire-places and cooking will have minimal effects.	Fire-wood will be imported and stored in the existing wood shed. Collection of wood from the forest will be prohibited. Fire ash will be removed from the Lodge upon departure. Gas cylinders will supply cooking fuel and be locked in a secure housing against the Lodge. The outside fire place, well clear of the native forest, will only be occasionally and not when during periods of

	open fire ban is imposed.
Installing 12V electrical solar power at the Lodge will have minimal effects	A new solar powered energy system will be installed to power 12v lights, a small fridge and for recharging devices in the lodge. Solar panels will be installed on the roof in a secure cage. No motorised electric power generators will be used, unless for short term building maintenance or construction work.
Taking water for drinking and washing from a small spring fed stream at the foot of Woolshed Hill will have minimal effect of waterways	Water is gravity piped from a small weir on the stream to 3 water storage tanks above the lodge and then gravity fed to the Lodge. The single water supply pipe is buried underground and not visible nor a trip hazard. The rate of water abstraction from the weir is very low and enables the weir to overflow most time of the year.

I. Other

Is there any further information you wish to supply in support of your application? Please attach if necessary and label Attachment 3a:I.

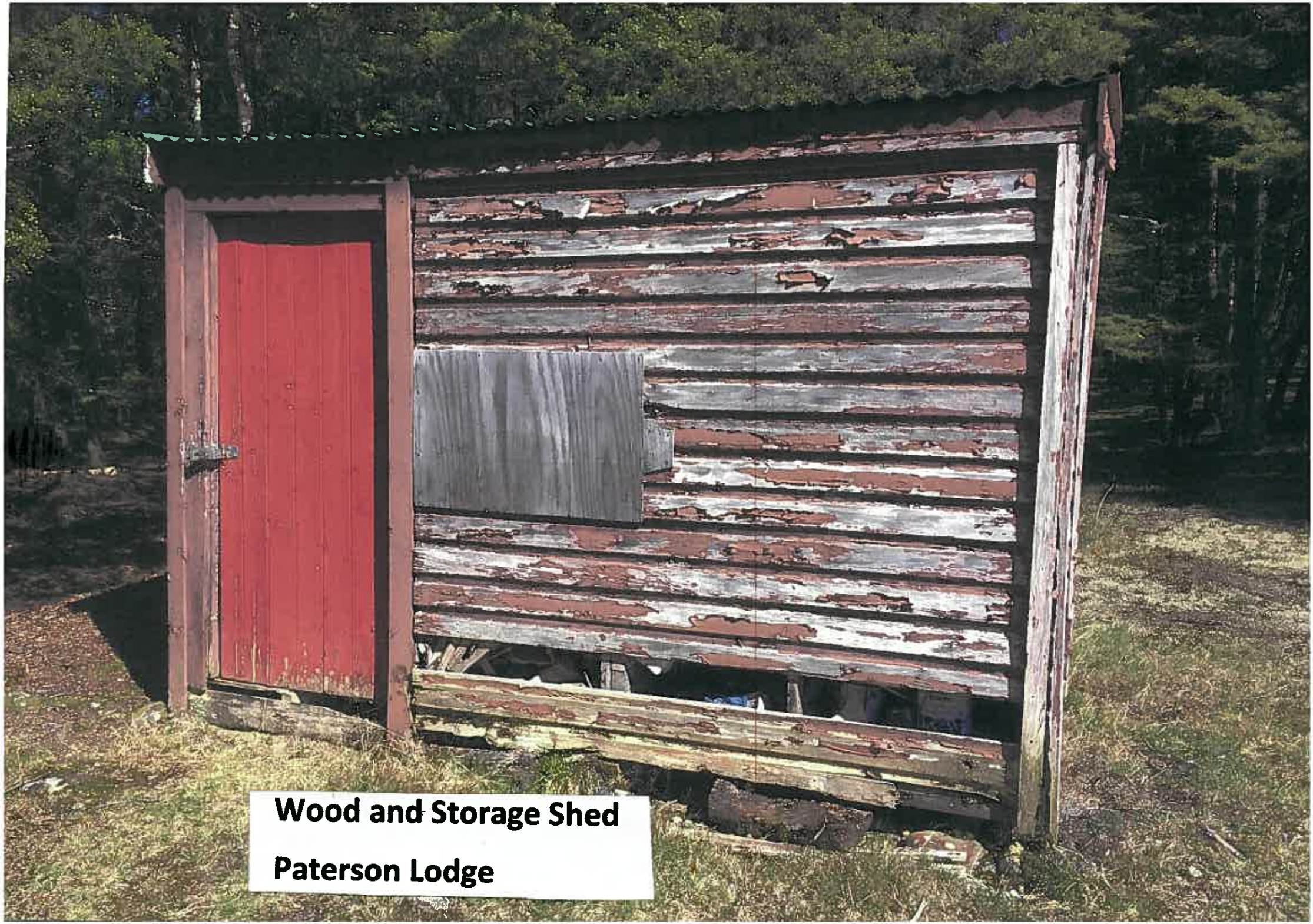

Paterson Lodge


St Margaret's College
Paterson Lodge est. 1970
Arthur's Pass National Park


Outside Longdrop Toilets
Paterson Lodge

Possible Toilet Upgrade for Paterson Lodge

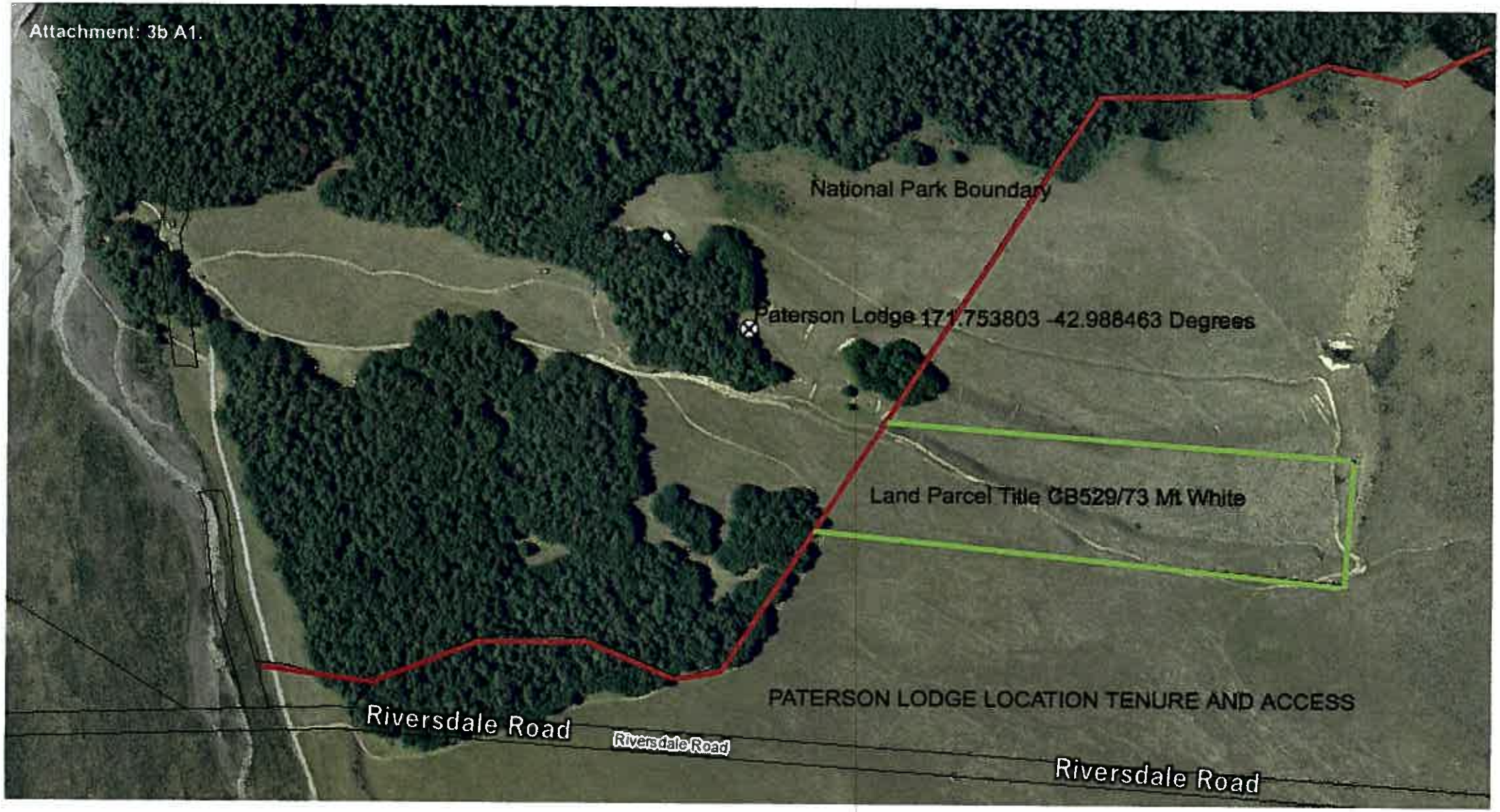
2 Wilderness Toilets over 1 Underground Tank



Wood and Storage Shed

Paterson Lodge


Water Supply Header Tanks
Paterson Lodge


Attachment: 3b A1.
National Park Boundary
Paterson Lodge 171.753803 -42.988463 Degrees
Land Parcel Title CB529/73 Mt White
PATERSON LODGE LOCATION TENURE AND ACCESS
Riversdale Road
Riversdale Road
Riversdale Road

Attachment 3b:C.

Proposed Lease Area

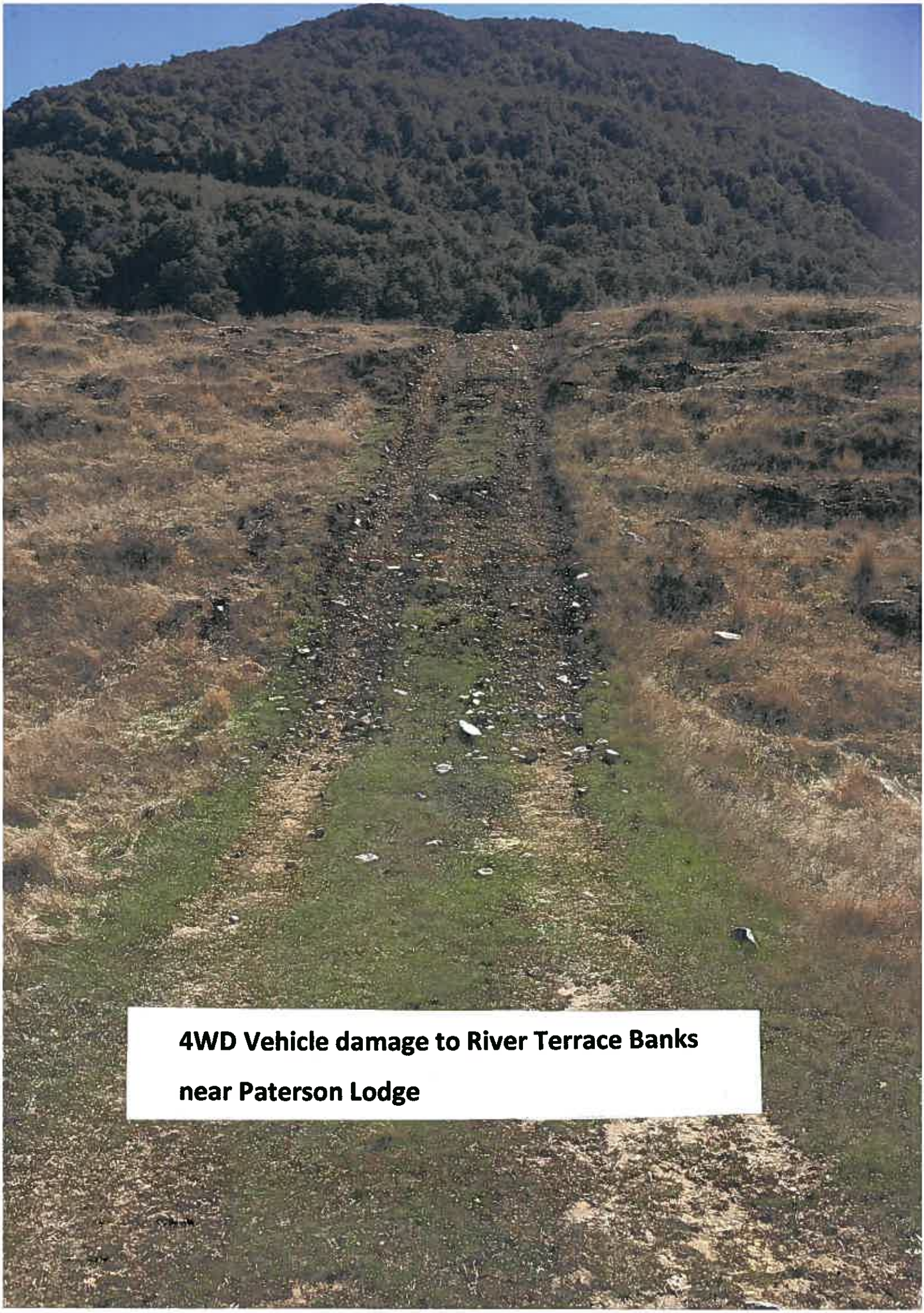
The Paterson Lodge facilities provide for the accommodation of upto 17 students and their teachers/trainers or supervisors for periods ranging from day trips to 7 day stays. The current facilities, while rudimentary, are an integrated system of vehicle parking, access footpath, accommodation, water supply header tanks and pipeline to the lodge, wood and storage shed, stone monument, fire place, outside toilet block and wastewater soak away areas that essentially support the educational use of the lodge by student groups, teaching staff and families. The area of the lease is approximately 1 ha, includes open grassland and beach forest and enables foot traffic between the building supporting the Lodge, e.g. toilets, woodshed and access foot path from the car parking area.

See aerial photo (3b:C) delineating the proposed lease boundary that encompasses the supporting building and wastewater soak away areas.

The proposed lease area is designed to provide area for student outdoor activities and camping near the Lodge. Camping out in tents is a part of the Rite Journey and Duke of Edinburgh award qualifying experiences for the students.

The proposed lease boundary connects to the water supply easement.

Paterson Lodge Lease Area and Supporting Infrastructure
Attachment 3b: C



4WD Vehicle damage to River Terrace Banks near Paterson Lodge

Attachment 3b.D

Request for selective exclusive possession of the public conservation land

When the Lodge is being utilised by college students and their teachers and supervisors or families of the college tramping club there will be children and adults carrying out activities and moving around the proposed lease area and beyond. With some activities such as the camping out in tents near the lodge, students will be sleeping on the ground at night.

The Trust Board and College leadership group have a duty of care to all users of the Lodge and must carefully manage all the risks to health and safety. We are very concerned about the risks posed by a) 4WD vehicles traversing the proposed lease area and the bordering terrace banks, and b) other persons camping very close to the Lodge and using the outdoor toilets and water supply. This vehicle traffic and freedom camping is occurring without restrictions and poses real safety risks to students, teachers and families using the Lodge and its proposed lease area.

Uncontrolled 4WD traffic up and down the river terrace banks has caused 5 deep wheel ruts and erosion scars up the banks near the lodge. One 4WD track is very near the lodge and traffic poses a serious risk to the building its occupants and people near the lodge. See Attachment 3b.C. Recent traffic up/down these scars is clearly evident and soils erosion continues to damage the landscape and scenic amenity. These 4WD scars need to be blocked, stabilised and rehabilitated back to natural vegetation. If public vehicle access and camping is excluded, signage would be erected informing the public of these exclusions. All vehicle barriers and signage would be subject to DoC approval and we hope DoC cooperation with the necessary restoration works.

Uncontrolled freedom camping is occurring very near the lodge because the area is accessible by vehicle, sheltered from severe weather and campers are using the outside toilets and water supply at the Lodge. Having uncontrolled camping within the proposed lease area and very near the lodge is a conflicting use to the educational and recreational activities being conducted by the Lodge users and poses risk of disruption, theft, vandalism and violence.

Consequently, SMC requests exclusive procession of:

1. All the buildings, including the Lodge, outside toilet block, wood/storage shed and water supply tanks and housing.
2. The proposed lease area for vehicle traffic, authorised by the College, camping and other educational activities conducted when school groups and families use the Lodge.

Note:

1. This selective exclusive possession does not restrict public foot or DoC traffic through the lease area.
2. SMC requests a cooperative approach with DoC on restricting 4WD traffic traversing the river terrace banks near the Lodge and in stabilising and restoring the 4WD ruts on the two terrace banks.

26/06/20

DoC Request for more information –

Concession Applications 79957-ACC and 7994-OTH

St Margaret's College provides further information to support the above applications, as requested by the Department of Conservation (DoC) letter of 21 February 2020 and subsequent emails.

1. New Toilets

St Margaret's College (SMC) proposes to upgrade the toilet facility from the existing earthen pit long drop toilet block to a modern, contained and pump-out toilet block over 6 years (image of possible upgraded toilet block provided in the application). Please note that SMC is not applying for consent/approval for these upgraded toilets in this application and expects to submit appropriate consent requests with the relevant authority following the grant of the lease and when final selection of the toilet facility and budgets for installation are determined within this proposed timeframe.

2. Lodge Users

Paterson Lodge is a comparatively small accommodation facility with a kitchen/common room, a bathroom and bunk rooms.

Paterson Lodge has 3 bunk rooms with 17 single bunk beds in total.

SMC has a new policy that the Lodge can be used by:

- SMC students and teachers for curriculum studies;
- The SMC Tramping Club members and their families;
- SMC staff and their families;
- SMC Trust Board members and their families;
- SMC Old Girls and their families;
- Other Canterbury Schools for outdoor education purposes;
- Organisers of the annual Coast to Coast event;
- Canterbury tramping clubs;
- DoC pest control researchers and possibly members of the public conducting voluntary pest eradication programs in the vicinity;
- The general public;
- Possible emergency and rescue services as the situations arise.

SMC will manage Lodge booking requests through its current publicly accessible website facilities booking system and Facilities Manager. Given the potential demand, SMC will have a clear policy to manage competing booking requests, i.e. multiple booking requests for the same or overlapping days, with priority given to SMC and other school educational activities, SMC community, tramping clubs, pest control work, sporting events, and the general public, in that order. Rescue services may override this prioritization.

Note:

1. The general public currently use freely the outside facilities of water supply and toilets.
2. SMC is not seeking to prevent the public traversing the proposed lease area on foot.

An accommodation charge per night of $15/adult, $8/youth (11-17 years), and a child free will be applied to all lodge users to cover consumables, e.g. gas and firewood, and repairs and maintenance, with the exception of SMC student and teacher groups. This is comparable to the accommodation charge for DoC serviced huts and the cost to use Kidson House operated by Christchurch Boys' High School.

While the SMC usage of the Lodge waned post-earthquake as the school and families recovered and rebuilt the whole school, the SMC Trust Board and school administration are organising increased school usage and wider access to other schools and the general public. The level of future usage is dependent upon demand for this limited facility and available alternatives and therefore cannot be estimated.

3. Activities with the Lodge

Over the past 50 years, the users of the Lodge have undertaken the following activities in the immediate area surrounding of the Lodge:

- Educational classes in science, geography and the Arts etc.;
- Outdoor tramping safety training;
- Camping in tents;
- Fire lighting, cooking and safety education;
- Various fun games;
- Scenic appreciation and relaxation;
- Bird watching and star gazing;
- Parking vehicles visiting, supplying and maintaining the Lodge; and
- Lodge maintenance.

SMC is seeking rights for Lodge users to continue these activities and possibly others, such as soil erosion control with native revegetation on areas damaged by illegal 4WD traffic, within the proposed lease boundary associated with staying at the Lodge. These use rights could be permitted through a lease or a license issued by DoC.

4. Options for the Concession

St Margaret's College is applying for a concession lease that would provide a) exclusive use of the buildings footprint and b) the ability to request and possibly gain exclusive rights for camping and vehicle access to the leased area and c) would provide rights to carry out the above activities around the Lodge in a safe manner. St Margaret's College would be satisfied with a similar concession arrangement sought by the Christchurch Boys' High School, i.e. a lease over the buildings footprint and a license covering the marked boundary permitting the specified activities. However, SMC would then request DoC to block illegal vehicle access up and down the river terrace faces scarred by 4WD tracks near the Lodge and eliminate freedom camping around the Lodge with signage and monitoring. (Note: During summer holiday periods, up to 20 people have camped beside the Lodge and used the water supply and toilets. Also, 4WD vehicles running up and down the wheel track scars on the terrace bank very close to the Lodge presents an ongoing erosion and vegetation challenge, as well as a safety hazard to Lodge users.)

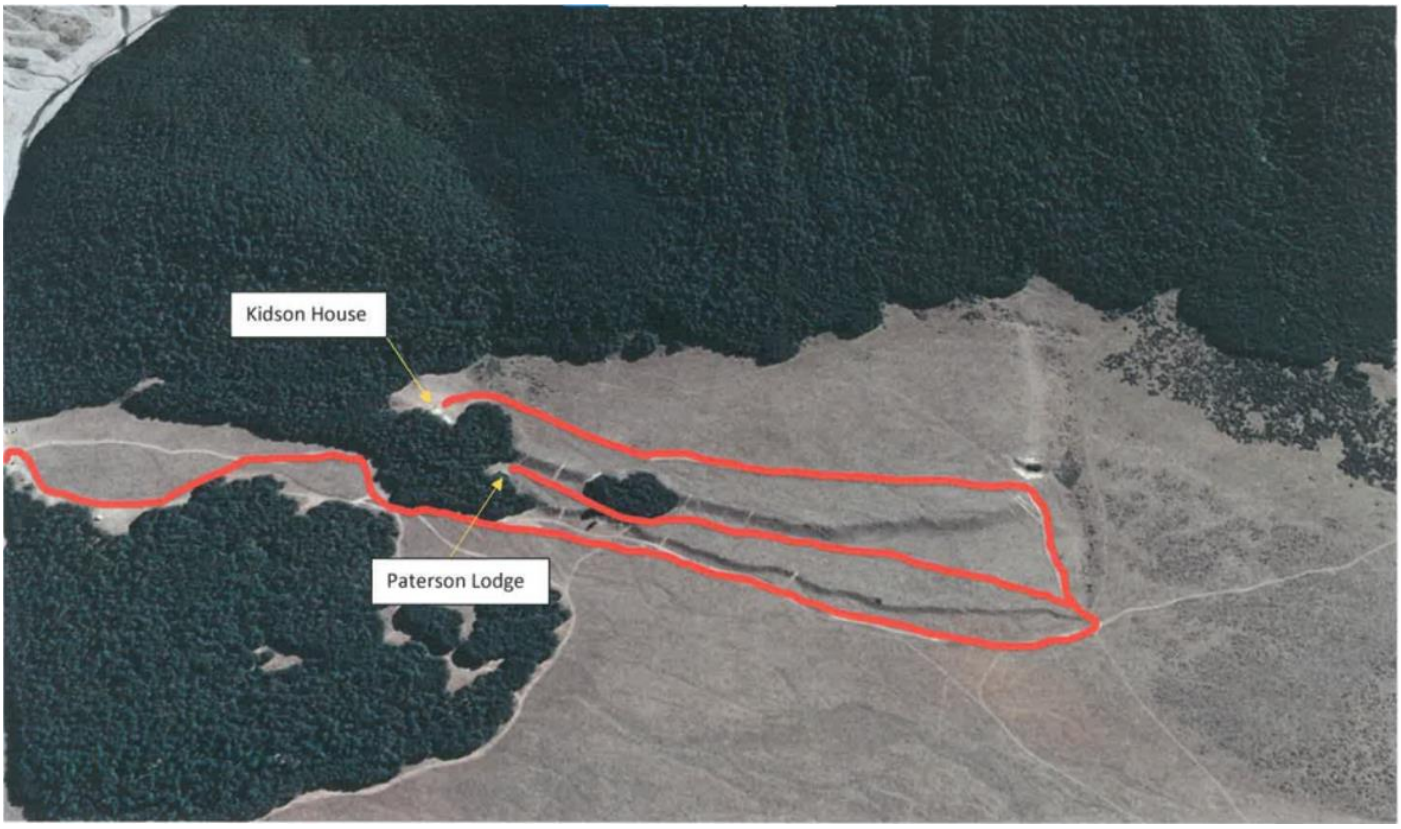
5. Lodge Access

The Lodge is situated on the upper river terrace and has been accessible by vehicle along an informal track for the past 50 years. Existing vehicle access to the lodge is on the river flat through the Hawdon camp ground and onto a dirt track that passes below the lodge. This track traverses part of the Hawdon Flats Reserve and land grazed by Mt White Station. Written permission to use this track from Mt White Station management has been sought.

See Attachment 3b A1 for an aerial map of the access track and land tenure.

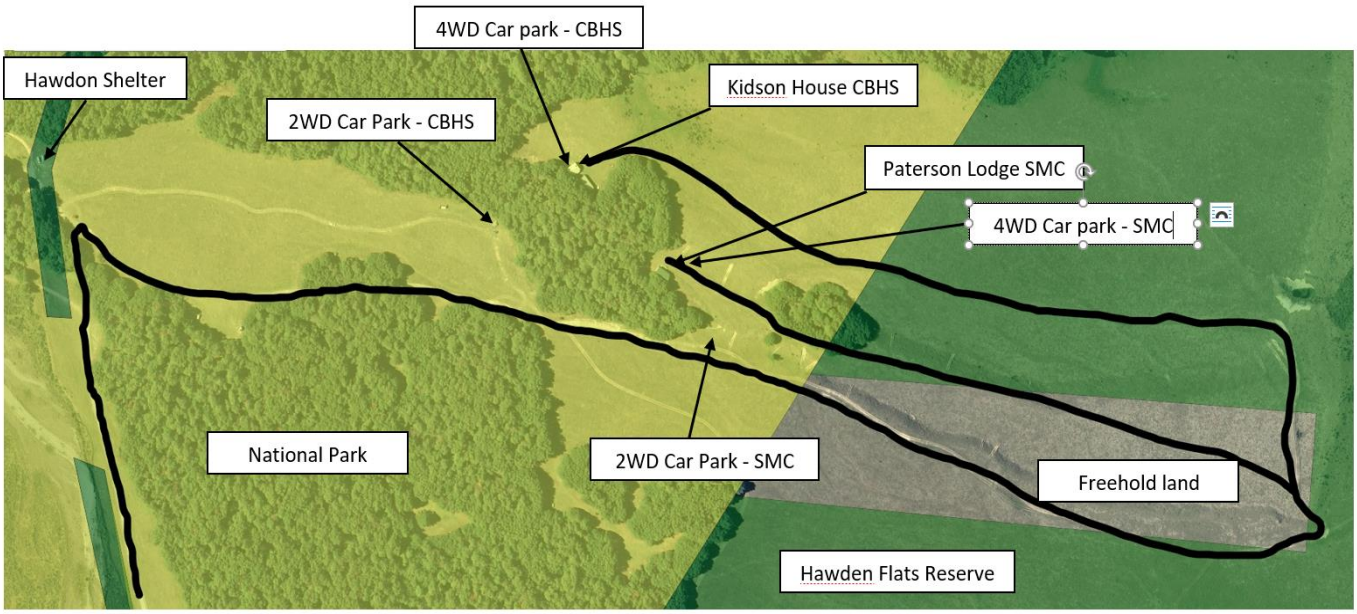
Note: the red line denotes the NP boundary to the west, the Mt White land parcel in green and the remaining area to the east of the NP boundary as Hawdon Flat Reserve.

The Ae*rial photo 1* below shows the vehicle access track to Paterson Lodge and Kidson House, in red, passing through the Hawdon camping ground.



Aerial photo 1 -Access track to Paterson Lodge and Kidson House

The Aerial photo 2 below shows vehicle access to Kidson House & Paterson Lodge, (black line). This passes through Public Conservation Land (Green), National Park (Yellow), and also freehold farmland (grey). We are requesting vehicle access through the yellow and green sections only and will request permission separately from the freehold landowners, (Mt White Station).



Arial photo 2 -Access track to Paterson Lodge and Kidson House with land tenure

SMC policy is that vehicle access to the lodge via the existing track should only be permitted to convey heavy loads e.g. fire wood and gas tank supply and maintenance work, transporting disabled people and in emergency situations, otherwise vehicles will park on the river flat below the Lodge, opposite the DoC camping ground, and Lodge users will walk up a short dirt walking track to the terrace flat and lodge.

6. Consistency with Statutory Planning Documents

National Parks Act 1980

SMC was granted Hut Permit in 1970 by the then Arthur's Pass National Parks Board for placement of the Lodge and supporting infrastructure at its present location. The Act recognises such earlier concessions.

General Policy for National Parks

The General Policy for National Parks 2005 regarding accommodation and related facilities, specifically Policy 9(a), allows for public use and the accommodation provided by educational services consistent with outcomes planned for the Park and Policy 9(e) setting out the requirements for this accommodation. Requirements most relevant to SMC's Paterson Lodge are:

1. Minimise adverse effects on National Park values and existing use and enjoyment;
2. Avoid adverse effects on natural surface and underground waters;
3. Be available for use by the public; and
4. Meet all legal requirements.

SMC is committed to complying with the requirements above. Requirements imposed upon users of the Lodge will include avoiding damage to surrounding National Park, taking nothing but pictures, no fire wood collecting, removing all rubbish and food scraps, parking vehicles on the river flat below the Lodge, excluding dogs or other animals, strictly adhering to fire lighting and noise controls. Further, educational posters inside the Lodge will articulate the Parks environmental and social values and ways to avoid and minimize potential adverse effects by Lodge users.

The taking of water from a small spring fed stream at the base of Woolshed Hill is for domestic purposes only. Existing soak away areas for sewage and greywater show no sign of surface expression and are compliant with Environment Canterbury requirements for pit toilet and grey water discharges.

The use of the Lodge is available to schools, tramping clubs and the general public.

Arthur's Pass National Park Management Plan

The Arthur's Pass National Park Management Plan 2007 *Section 6.4.6 - Existing Clubs and School Lodges* makes specific references to existing School lodges, including Paterson Lodge.

Paterson Lodge is operated consistent with this policy as it primarily exists as an accommodation base for student outdoor education and school community use. While the use of the lodge did wane following the Christchurch earthquake as the focus was on rebuilding the school and maintaining the high educational standards, use of the lodge is increasing and other schools and the general public have recently been given access to this facility. SMC will comply with the requirements of Selwyn District Council. Further, SMC will ensure that the Lodge has appropriate use and improved environmental care standards, including minimising vehicle use and better vehicle controls, as well as improved environmental and mountain safety education materials.

Canterbury (Waitaha) Conservation Management Strategy

The Canterbury Conservation Management Strategy 2016 section 3.11 refers to private accommodation and related facilities, not available to the general public. Under the General Policy 2005 the use of private accommodation is to be phased out**,** unless specifically provided for or allowed in legislation. In this case, section 50 of the National Parks Act 1980, enables the Minister to grant concessions and recognises pre-existing hut permits. SMC will enable other schools, tramping clubs and the general public to apply to use the Lodge, thus making it available to the general public.

Section 3.2 Vehicles, controls vehicle use and access in the National Park. Vehicle use associated with SMC operation of the Lodge will be consistent with the stated policies on vehicle use. Vehicle traffic to the lodge will be confined to

the existing access track for specified essential purposes, e.g. emergency, servicing, and limited to “park and walk” for casual Lodge users. These restrictions on vehicle use will minimise the impacts of vehicle traffic on NP values.

Further, the current operation of the Lodge complies with the requirements of Environment Canterbury’s Land and Water Regional Plan concerning discharges from pit toilets and greywater and is compliant with fire safety regulation of local government.

7. Existing Structures

Refer to Attachment 3b: C for the relative location of the Lodge, woodshed, outside toilet block and water header tank housing.

The footprint area for these facilities are:

- Paterson Lodge – 9.75 m by 6.5m
- Concrete deck attached to Lodge - 2.5m by 4.4m
- Woodshed – 3.5m by 2.0m
- Water supply header tank housing – 1.7m by 4.4m
- Outside toilet block – 4.0m by 2.7m

Water supply pipeline from water intake to the header tanks is approximately 160m in length and mostly buried underground. Water supply pipe diameter is 20mm.

The vehicle parking area and associated footpath up the terrace bank is shown on Attachment 3b: C. Use of this parking area negates cars and mini buses having to drive along the river flat track to get to the lodge.

The proposed vehicle parking area can fit 4-5 cars or 2 mini busses and is grass covered. The footpath up the bank is gravel and dirt surfaced. Vegetation removal is not required to maintain these areas.

The small stone monument, approximately 1.2m diameter, was build when the Lodge was established and is located near the top of the access footpath, approximately 30 m south-east of the Lodge as seen on Attachment 3b: C. Its top plate appears to have has been removed, possibly stolen some time ago, and will be replaced with a rose compass, and possible inscription dating the establishment of the Lodge.

A small ring of stones in the clearing approximately 7.0 m north from the Lodge creates an outside fire place used infrequently and only when fires are permitted.

The Lodge has a bathroom containing one flush toilet. Toilet waste waters drain to an underground gravel filled soak pit constructed when the Lodge was established on the site. See Attachment 3b: C for the location of the soak area. Wastes break down through microbial action and soak into surrounding substrata. There is no evidence of the location of the soak area on the ground surface. The flush toilet is mainly used at night time. Otherwise the outside pit toilets are used routinely during the day time.

The Lodge has an existing concrete deck extending from the front of the Lodge. -The dimensions are 2.5m by 4.4m. It is possible that this concrete/rock slab could have a roof and partial sides constructed in the future to provide additional shelter from the sun, wind and rain and provide a better place to hang and dry wet tramping gear. Approval for this possible building addition is not sought in this application and SMC would need decide to proceed with this option and then comply with building consents required from the Selwyn District Council and any permissions from DoC.

8. Effects of Lodge use

Use of Paterson Lodge by SMC students, teachers and their families, other schools, tramping clubs and the general public will have the following effects on other users of the National Park.

Positive effects:

- Enables outdoor and mountain safety education opportunities for young people.
- Provides for casual and limited use of Lodge external water supply and toilet facilities.
- Greater public safety provided with active presence of Lodge residents tramping in the Hawdon Valley and beyond.
- Lodge is available to DoC staff conducting research on pest control management.
- With prior permission the Lodge is available to Christchurch Boys' High School to accommodate any overflow from Kidson House.
- Available to accommodate other school groups, tramping club members and the general public.
- Contribution to pest control supporting wildlife presence and abundance.

Negative effects:

Some increase in vehicle traffic through the Hawdon Camp ground. Risks from vehicle traffic to the lodge will be mitigated by compliance to DoC traffic control signage and SMC guidance to Lodge users on speed, sticking to existing tracks and vehicle parking location.

- Some increase in use of tramping tracks with associated trodden ground and noise. This risk will be mitigated by SMC guidance to Lodge users to stick to marked tracks and respect other NP users by not causing a noise nuisance.
- Some risk of increased litter and fire risk. This risk will be mitigated by SMC guidance to Lodge users to contain and remove all waste material and not to light outside fires when fire bans are in force by DoC.

9. Pest Control

SMC will assist with plant and animal pest control in the National Park by the following:

- Lodge users will maintain rodent pest control measures in the Lodge and supporting buildings.
- Invasive weeds will be controlled by pulling and chipping within the lease boundary.
- With prior permission, the Lodge can be used by DoC staff undertaking research and monitoring for pest management, as occurs now.
- SMC students, staff and their families may participate in organised plant and animal pest control programs on a voluntary basis.