

1. For simplicity sake I will only refer to Real Journeys Limited, not Te Anau Developments Limited. Nevertheless some of the points made are relevant to either or both entities.

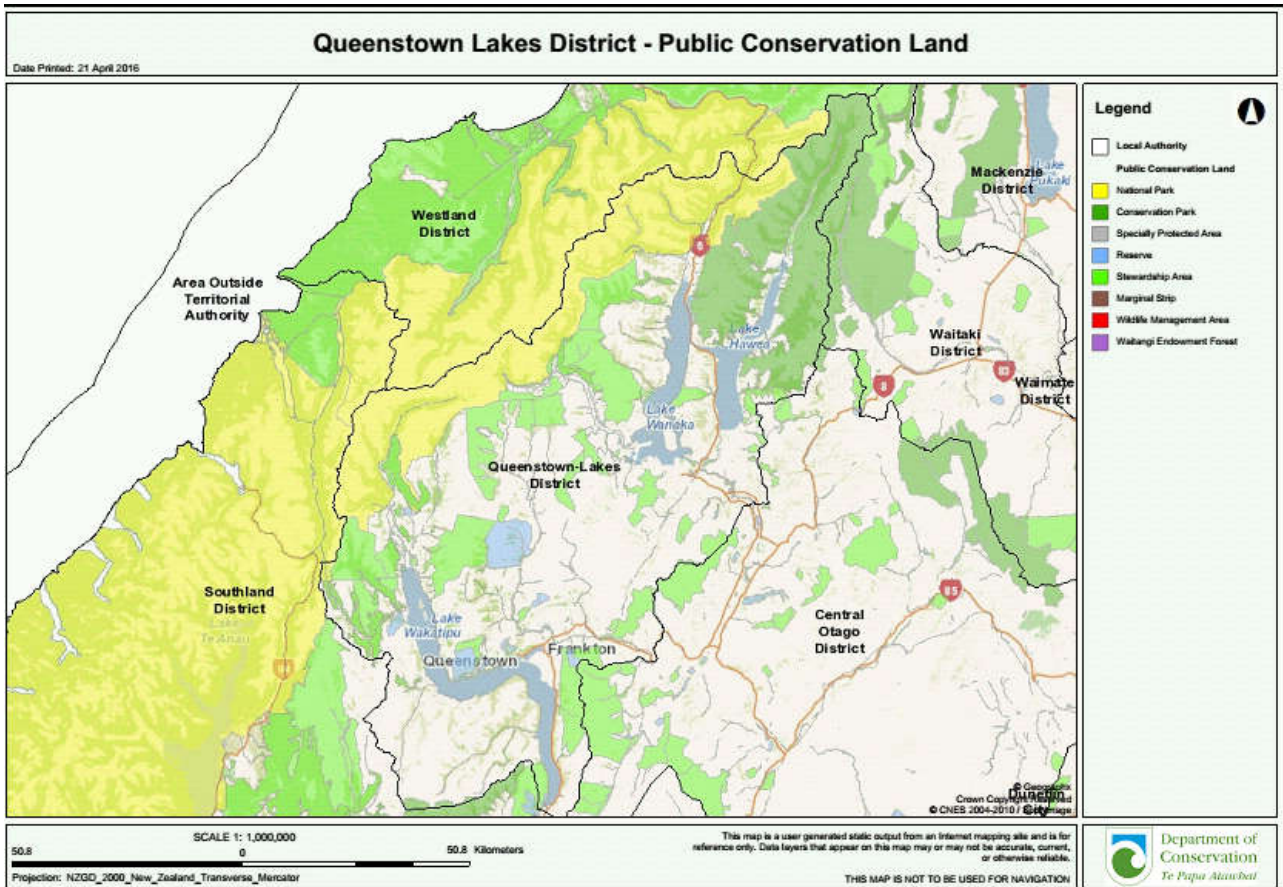
Chapter 21 Rural Zone

2. We have done some rough calculations and at least 48.3% of the District is public conservation land or in QLDC reserves; refer below. Hence, we believe it is safe to assume that a significant proportion of the area zoned as rural in the PDP is not farm land. Consequently, I contend that it is not appropriate to put such a significant focus on the importance farming in shaping rural landscapes in the PDP, when a large proportion of the rural landscapes are either reserves or waterways where recreation predominates as the main land use.

Description	QLDC obtained area (ha)	QuickMap obtained area (ha)	% of Overall Area
Rateable property area	419,910		49.5%
QLDC reserve lands	2,218		0.3%
DOC reserve lands	410,331		48%
Lakes*		65,290	7%
Rivers**		5,564	0.7%
totals	832,449	70,854	
Overall areas provided	846,700		105.50%

*The lakes measured include Wakatipu, Wanaka, Hawea, Lochnagar, Hayes, Diamond (x2), Moke, Sylvan, Luna, Dispute, Johnson and other smaller lakes.

** Rivers include the Kawarau, Shotover, Matukltuki, Makarora, Hunter, Clutha, Dart, Greenstone/Caples, Rees, and Lochy. Some of these include DOC reserve land area.



3. Real Journeys is concerned that the PDP does not provide the correct balance between the need to protect the natural environment and need to allow for the development of the tourism industry. That is, PDP does seem to be sufficiently enabling, to allow for the expansion and development of tourism products to address the identified growing demand for tourism related activities across the District.
4. Regarding, informal airports I suggest 14 flights per fortnight, rather than two flights per day, be the permitted limit for informal airports; to address uneven demand, which is typical in the tourism industry. Passenger numbers can fluctuate significantly, with little notice because bookings are often changed at the last minute. Last minute booking changes and last minute bookings are a growing trend in the tourism industry. Therefore, for a given informal airport there could be five flights in one day and then no flights for six weeks. Hard and fast numbers are difficult to comply with and make it challenging for tourism operators to respond to additional and changing visitor demand.
5. "TSS Earnslaw" is the only coal fired steamship in operation in the southern hemisphere, and one of the few passenger steamships worldwide which has not been repowered, and has been in continuous operation since her launch in 1912; which makes a cruise on Lake Wakatipu aboard the "TSS Earnslaw" one of the most unique experiences in the world. Moreover, to the year ended September 2015, Real Journeys carried 203,847 passengers on the "TSS Earnslaw" (up 20% from 2014), thus the "TSS Earnslaw" is a significant visitor attraction for the District.

6. Because of the uniqueness, and the historic value of “TSS Earnslaw”, plus her challenging operating characteristics, we believe the PDP should adequately protect and provide for the operation of the “TSS Earnslaw”. For Real Journeys, ensuring the operation of the “TSS Earnslaw” is given protection in the PDP, is the single most important aspect of the PDP chapters which have been notified thus far.

Chapter 33 Indigenous Vegetation

7. Real Journeys and its subsidiary companies holds approximately 30 Department of Conservation authorisations; which vary from marine mammal viewing permits, easements, leases, to concessions for activities. My role with Real Journeys involves applying for these concessions, and ensuring our compliance with concession conditions. From my experience, the process of applying for concessions is a much less exacting process, compared to the resource consent process, especially since the April 2015 amendment to the RMA.
8. Indigenous vegetation clearance within Ski Area Sub Zone on land administered under the Conservation Act would be a one off permit process, which is processed through the DOC District Offices, not the nationally based permissions team. Refer <http://www.doc.govt.nz/Documents/about-doc/concessions-and-permits/concessions/concession-application-7a-other.pdf>
9. I do not believe such one off permit applications have the same rigor as RMA based processes. Consequently, I contend the proposed new rule 33.3.44 is inequitable and disadvantages the operators of “ski fields” on privately owned land.
10. Moreover, such an exemption for land administered under the Conservation Act would set a significant precedence and opens the door for businesses to advocate, for other activities to be permitted in the PDP, if a DOC concession is held. That is, why shouldn’t such provisions apply to other areas in the District such as the Mount Aspiring National Park? For instance refer Southland District Council PDP Rule Rural. 1 which reads as follows:

Rule RURAL. 1 - Permitted Activities...
22. Any activity (or part of an activity) on land managed under the Conservation Act or any enactment in the First Schedule of the Conservation Act provided that:
 - (a) A concession has been granted from the Department of Conservation;*
 - (b) Adequate provision is made for waste collection and disposal; and*
 - (c) Car parking is provided in accordance with the Subdivision, Land Use and Development Bylaw.*
11. To avoid duplication, this issue could be addressed from the other direction. That is, if the operators of Ski Areas on land administered under the Conservation Act, gain resource consent for indigenous vegetation clearance, then the Department could simply supply their approval.

Dated: 24 May 2016

A handwritten signature in blue ink, appearing to read 'Fiona Black', written in a cursive style.

Fiona Black
Real Journeys Limited