APPENDIX 2
MANAAKI GROUP HOLDINGS ADDITIONAL INFORMATION
CONCESSION APPLICATION NUMBER 67946-OTH

Additional information is provided below in relation to further information requested from DOC dated 14th June 2018.

QUESTION 1: ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

a) Hazards

An assessment of potential hazards is provided below:

Hazard	Methods to avoid, remedy or mitigate effects
Falling trees	The Department of Conservation's Hut Service Standards and Best Practice Guidelines for Visitor Risk [as provided to the Applicant by DOC National Safety and Wellbeing Manager Mike Massaar 14 June 2018] will be adopted for this site. Consistent with this, the requirement of the Department of Conservation in relation to vegetation clearance will be complied with as a means of mitigating the risk of this identified hazard. The detail of what is required and how that will be achieved is recorded in the Ecological Impact Assessment [Singers 2018].
Cliff collapse	No evidence of cliff collapse has been observed on the Lease site (which consists of a long narrow bench 4-5 metres above the Moerangi Stream). The bench concludes with a gentle slope on the eastern side which has well established ground cover, with few big trees that could pose a risk to occupants. It is not intended to remove any of the vegetation on this slope. On the western side of the site the ground slopes down to the Moerangi Stream. There is no evidence of cliff collapse along the length of the site and mature vegetation exists there providing protection from cliff collapse. The characteristics of the site are captured in the Ecological Impact Assessment [Singer 2018].
Fire	The wharekai/dining and kitchen facility will be equipped with fire extinguishers sufficient to put out a fire in its infancy in either that structure or in any of the ten wharemeo/sleeping huts. It is also intended that a portable pump be kept on site, with hoses to reach the Moerangi Stream below the site for supply of water in the event of a fire in any of the structures. Testing of this equipment will be specified in the Site Operations Manual for use by on-site staff. An assembly area away from the structures on the riverside will be established and information about what to do in the event of a fire in any of the structures will be posted in all buildings. Clients, staff and contractors entering the site will be briefed on what to do in the case of an emergency, such as a fire. An outside fire for the comfort and enjoyment of clients (a novel experience for many overseas visitors) will be established in a professionally built fireplace well away from the buildings. The Principal of the Applicant Company has had more than 30 years of operating multi-day tours in the nearby Okahu Valley and has not experienced any issue with fires throughout that time, especially as the Whirinaki Rainforest vegetation is ever-green and this area has regular periods of abundant rainfall.
Flooding	As recorded in the application and the Ecological Impact Assessment [Singers 2018], there is no evidence that the Lease site has been subjected to flooding in recent history. The tell-tale signs of flooding, such as flattened or damaged vegetation, are absent on both the banks and the surface of the site, which as earlier noted is 4-5 metres above the Moerangi Stream. The area designated for a Drop Zone on the river edge below the Lease site is subject to occasional flooding but there is no proposal to build structures in that location. A constructed heli-pad is not required nor intended as part of this application, as advised in section (b) below.

b) Helicopter pad

An assessment is requested *"of the proposed helicopter pad on the environment including but not limited to ecological impact, hazard risk, cultural impact, noise, impact on remoteness and*

visitor valued. How will it meet CAA or other requirements? Please advise how rule 26.1.2 of the Whirinaki Te Pua-a-Tane Conservation Management Plan will be met regarding occasional helicopter landings, including reason why the nearest designated helicopter landing cannot be used".

The request appears to be premised on a new helicopter landing pad being established adjacent to this proposed Lease site. This is contrary to the application [Form 3b, page 4 - Access and Servicing] which states*: "A new drop zone … will be used during the construction phase and for future provisioning of this tourism facility utilising sling loads of stores and equipment. There is no intention to develop a formal heli-pad on this Drop Zone as one already exists at the public Moerangi Hut, about 700 metres to the north of the proposed Lease site."*

For the avoidance of doubt, this application does not propose a helicopter landing pad adjacent to the Lease site. Hence it is submitted that Policy 26.1.2 (below) of the Whirinaki CMP which is concerned with the circumstances when new aircraft landing sites will be approved is not relevant to this application.

> 26.1.2 Should grant concessions for occasional aircraft landings at sites not identified in Table 3 only for:
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> a) wild animal control activities;
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> b) the construction, operation and/or maintenance of equipment or utilities authorised by the Minister; or
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> c) to support research and collection activities authorised by the Minister;
>
> d) where access cannot be reasonably provided either by vehicles or using one of the sites identified in Table 3 and the activity is consistent with the policies in Section 25.1.

However, should the Department of Conservation require that a formal helicopter landing pad be developed adjacent to the Lease site, the Applicant is prepared to do so subject to being able to satisfy any requirements the Civil Aviation Authority may have. The Department of Conservation's policy and guidelines relating to vegetation clearance around heli-pads would also be adopted.

Should the Department of Conservation require a formal heli-pad to be constructed it is submitted that the test applied by section d) of Rule 26.1.2 would be met in that the Lease site is *not able to be accessed by vehicle* as it is some 20 kilometres from the nearest public road and lies deep within the forest. Nor is it feasible to land what will be a significant volume of construction materials (in the initial stages) nor stores required after commissioning of the proposed accommodation and associated facilities at the nearest heli-pad [Moerangi Hut] and transport them over-land to the Lease site.

In relation to aircraft operations within Whirinaki Te Pua-a-Tane Conservation Park it is noted that helicopter operators are generally permitted as recorded in the Whirinaki Conservation Management Plan [enacted 09 October 2017]. In addition to the provision for such operations utilising designated landing sites as recorded in Table 3 (subject to the aircraft operator concerned having an appropriate concession) there is also provision for *landings relating to specific activities, on an occasional basis* [*Policy 26.1.2 and 26.1.3].* Such activities are provided for in the concession held by the Applicant Company's primary charter operator, Heli Resources 2012 Ltd [number BP 26896 - Air].

Specifically, and in relation to the issues raised in the request for Additional Information, it is submitted that:

i) Policy 26.1.2 of the Whirinaki CMP is not relevant to the activities associated with the Drop Zone at the proposed Lease site as no landings are proposed at this location;

ii) Advice from the Operations Manager at the Applicant Company's charter operator is that there are no relevant Civil Aviation Authority rules that specifically apply to depositing or uplifting materials from riverbanks in forest locations, other than those which are relevant to the safe operation of rotary wing aircraft (ie helicopters) and that net/sling loads are a common occurrence in relation to DOC's own operations within Whirinaki CP.

iii) In relation to this application the heli-pad at Moerangi Hut some 700 metres to the north of the Lease site cannot be used during the transport of construction materials due to the volume of these materials nor subsequently for on-going supply of the proposed tourism accommodation due to the terrain between that heli-pad and the Lease site and the distance between the Moerangi Hut and the Lease site. The proposed Drop Zone has been designed to specifically answer these issues;

iv) If approved, the Lease will require that all inorganic waste and human effluent (solids) be removed from the Lease site, the former at regular intervals and the latter at the end of each operating season (or more often if required pursuant to any resource consent issued by the Hawke's Bay Regional Council). These materials will have to be lifted off the Lease site by helicopter and the Drop Zone will be required for this purpose due to the existence of buildings within the Lease site itself;

v) The ecological impact of utilising the proposed Drop Zone has been adequately addressed in the Ecological Impact Assessment [Page 16] with mitigation of any temporary potential effects recorded in that document;

vi) The Department of Conservation's vegetation clearance policy [as provided to the Applicant by DOC National Safety and Wellbeing Manager Mike Massaar on 14 June 2018] will be applied to the establishment and on-going maintenance of this Drop Zone;

vii) The Hazard Risk associated with helicopter operations at the proposed Drop Zone will be identified and addressed in a new Operations Health and Safety Manual being produced by the Applicant's Health and Safety contractor. This will be subject to independent audit and a certificate attesting to same will be provided to the Department of Conservation upon request. The Hazard Risk associated with activity at the Drop Zone will be consistent with that which exists at the Applicant's existing Lease site in the Okahu Valley of Whirinaki Te Pua-a-Tane Conservation Park, some 4670 metres to the south east, where there is a designated heli-pad and where helicopter landings are a regular occurrence;

viii) No cultural impact resulting from helicopter operations utilising the proposed Drop Zone adjacent to the Lease site have been identified and none are envisaged. A Cultural Impact Assessment supplied with the application for this Lease site did not identify any historic use of the location of the Lease site or the Drop Zone nor any waahi tapu or seasonal habitation sites within the Moerangi Valley. The advice of Ngati Whare iwi's historian/Treaty claims researcher is that he has found no evidence of occupation this deep into the Whirinaki forest, specifically in this location;

ix) It is accepted that any aircraft movement within a Conservation or National Park has an impact on remoteness, as has been widely canvassed on a national basis.

The occasional activity intended for this Drop Zone however is unlikely to impact remoteness to any significant degree, based on the irregular helicopter servicing flights anticipated;

x) As recorded in the Ecological Impact Assessment [Page 12] public use of the Moerangi Valley is currently minimal. It is not expected that this will increase significantly in the foreseeable future based on the remoteness of this area and the availability of other more readily available 'front country' tracks and huts within Whirinaki Te Pua-a-Tane Conservation Park;

It is expected that most of the future use of this location will come from the Applicant's commercial walking clients, however this number is restricted to 25 per day, with an annual limit of 3000, pursuant to the Applicant Company's Guiding Permit. In the context of the remoteness of the Moerangi Valley (even at the maximum daily level of activity permitted to the Applicant's operations) no significant effect on public enjoyment is foreseen. To the contrary, the provision of new accommodation facilities on the Lease site will enhance public enjoyment by providing recreational opportunities to a higher standard of comfort than currently available in this locality, providing access to a wider range of visitors, especially those from overseas. It is noted a key objective of the Whirinaki CMP is to enhance recreational opportunities within Whirinaki Te Pua-a-Tane Conservation Park;

Of special note is that the Lease site and Drop Zone has been selected for their separation from the Moerangi Traverse dual-use walking and mountainbiking track and the Moerangi [public] hut and will be located at the terminal point of a new link track. While there will be no restrictions on who uses that track, it is likely that clients of the Applicant Company or those associated with its operations will be the most dominant users;

xi) In summary, given the nature of the terrain in which the Drop Zone will sit, and the relatively infrequent use of the area by members of the public currently and into the foreseeable future, there is expected to be no significant loss of public enjoyment as a result of the establishment of this Drop Zone.

Based on the assessment of the combined weight of building materials required to establish the proposed tourism accommodation on the Lease site, a maximum of three days is anticipated for the air transport required during the construction phase. This may be spread over two periods, with materials required for the structure platforms likely to be transported during one day and some weeks later, the balance of the materials over several more days, weather dependent. These flights have been planned to take place outside the summer tourism season, while also avoiding public holidays.

Servicing of the Lease site following commissioning of the tourism accommodation facilities thereon which will involve the Drop Zone is not expected on more than one day a week during the operating season, with two or three sling/net loads anticipated on that day. Each flight takes only a few minutes to arrive, drop its load and depart.

Helicopter operations have had a long history within Whirinaki Te Pua-a-Tane Conservation Park and its predecessors. The Principal of the Applicant Company has utilised helicopters activity for his commercial operations in Whirinaki Conservation Park since 1989, with no complaint from any member of the public over the ensuing period of 30 years. It is not anticipated that the operation of the

Drop Zone immediately adjacent to the Lease site will prompt complaints, although this cannot be discounted. There is, however, no more likely issue with this Drop Zone, in this locality, than there is at any of the designated heli-pads within Whirinaki Te Pua-a-Tane Conservation Park, or on any other Public Conservation Land throughout New Zealand.

e) Cultural Impact Assessment

The request for additional information asks for a *"Cultural Impact Assessment prepared by a person with proven experience in preparing such reports*".

A Cultural Impact Assessment was provided with the application and is considered by the Applicant Company to be appropriate and adequate on the following basis:

- The document was prepared, at the request of the Department of Conservation, to fulfill the purposes of the Applicant Company's previous application pertaining to the Okahu Valley site 4670 metres to the south east and this Lease application for the Moerangi Valley site;
- The Permissions Advisor [Arna Litchfield] who processed the Okahu Valley Lease application in 2015 did not raise any issues about inadequacy of that document, nor about the author's ability to be deemed *a person with proven experience in preparing such reports.* In her report to the Decision Maker, Ms Litchfield states: "*In conclusions to this CIA, the Applicant notes that he does not believe the activity will have a negative effect on the values of Ngati Whare. It is noted that consultation undertaken by the Department did not provide any information to contradict the physical effects of the activity, as present by the Applicant in this CIA, and the application generally. The Department accepts the advice that there are no physical cultural effects of this activity, based on the contents of the CIA*.";
- The Cultural Impact Assessment has been supplied to Ngati Whare iwi with a request for feedback. No issues have been raised by Ngati Whare in response, either with the content of the CIA or the qualification of the author to produce it;
- As noted in the application, the Cultural Impact Assessment provided was prepared with the assistance of Ngati Whare's historian/Treaty researcher, with the approval of the Chairman of that iwi's runanga. The Ngati Whare researcher advised that he has found no evidence of occupation this deep into the Whirinaki forest, specifically in this location and no waahi tapu or habitation sites are recorded on the maps provided for Treaty settlement purposes;
- It is acknowledged that author of the Cultural Impact Assessment supplied with this application is the sole Director of the Applicant Company (as also acknowledged by DOC Permissions Advisor Arna Litchfield in her report to the Decision Maker in relation to the Okahu Valley lease application in 2016);
- The author of the Cultural Impact Assessment is a vastly experienced researcher and writer who has been published worldwide. His published works include two books on historical New Zealand crime and a multitude of feature articles in magazines and newspapers during a career that has spanned more than 40 years. Specifically, the author has in the last 12 months been undertaking a private research work intended for publication entitled 'Maori Occupation and Use of the Whirinaki Rainforest'. In this he has amassed more than 1000 pages of documentation including but not restricted to a report commissioned by the Waitangi Tribunal [Tulloch 2002] two research reports [Wiri 1994 and Boast 1999] a Department of Conservation report on the ecology and history of Whirinaki [Beveridge, Smale, Christensen and Stewart 2004] and a

comprehensive report on mana whenua matters [Hutton 2009]. Alongside this sits many documents and publications produced by late 19th century and early 20th century historians [Best, Gudgeon, Stout and Cowan] along with a series of archeological reports [Bevan 1980s]. These documents are all specific to Whirinaki and form a significant resource pool on which the author has drawn in producing the Cultural Impact Assessment provided with this application;

- The author of the Cultural Impact Assessment is currently producing a synopsis for an Auckland-based film company on the historic journeys of a 19th century pioneer with the objective of creating a New Zealand feature film, yet another example of his research experience being recognised by those in this field.

This is not, however, simply a matter of the author claiming the experience in producing historical and cultural works. Since 1985 he has been heavily engrossed in the Whirinaki community, both personally and through his business activities. This has extended to having a Ngati Whare partner, employing local residents (most of whom whakapapa to Ngati Whare), organising visiting groups to be hosted at Ngati Whare marae and holding countless discussions with kuia and kaumatua of that iwi over a 33 year period. Through the latter he has gained significant personal knowledge of the history, tikanga and kawa of the iwi of Whirinaki, all of which played a role in production of the Cultural Impact Assessment provided with this application.

On the basis of the above, and the author's long history as a professional researcher, there can be no question he qualifies as being a "*person with proven experience in preparing such reports"* as required by the request for Additional Information. His 33 years of tramping the valleys of Whirinaki Conservation Park [since 1985] and visiting numerous historic sites in person, coupled with his extensive library of historical and contemporary documents specific to Whirinaki moreover leaves him infinitely qualified to produce a Cultural Impact Assessment and to have it deemed adequate and appropriate for the purposes of this application.

Ngati Whare runanga is not considered by the Applicant Company an appropriate body to produce a Cultural Impact Assessment as suggested in the request for Additional Information. That is because public statements of its representatives [March 2018] are that this iwi intends to launch its own tourism operations at Whirinaki which would place it in a position of being a future competitor with the Applicant Company and as such a potential conflict of interest may exist. Furthermore, for the reasons set out above it is not expected that a new Cultural Impact Assessment would produce findings that significantly differ from those recorded in the Applicant's CIA given that much of the information recorded therein was supplied by Ngati Whare's own historian and Treaty researchers.

Further, and as recorded in the application, the Applicant Company has advised three of the five iwi recognised by the Whirinaki CMP [Ngati Whare, Ngati Manawa and Tuhoe] of its intentions for this site in the Moerangi Valley and has not received any adverse responses.

ADDITIONAL ASSESSMENT

It is considered that the following positive effects will result from granting the lease application:

(i) Educating visitors to the special features, environmental and recreational aspects of this world-renowned temperate rainforest during overnight stays;

(ii) Providing quality accommodation designed to blend with the natural surroundings of the site, to a standard required by the international tourism marketplace;
(iii) Providing facilities for use by Department of Conservation personnel;
(iv) Having on-site staff and volunteers assist the conservation effort in this region, including pest control and other programmes;
(v) Providing safety for members of the general public by way of staffed shelter and facilities (including hot showers) and assisting in times of emergency;
(vi) Providing another compelling reason for visitation to Whirinaki Te Pua-a-Tane Conservation Park by way of facilities not available in public huts managed by the Department of Conservation.

The following additional methods (which remedy, mitigate or avoid potential adverse effects) are identified:

i) Structure components, such as floor platforms and wall sections, will be prefabricated and flown to the site by helicopter;
ii) Site works will be undertaken by qualified building contractors working under the supervision of the Construction Project Manager (a former Local Body building inspector);
iii) Construction staff will be fully briefed on environment protection imperatives;
iv) Maintenance (on-site management) staff will be fully briefed on environmental protection imperatives;
v) Human waste (ie sewage sludge) will be pumped into drums and removed from the site as required. This is usually done in the tourism off-season;
vi) All inorganic refuse will be removed from the site as required;
vii) Fuel and other chemical compounds, such as those used for cleaning, will be stored in a defined area away from the client zone and secured appropriately;
viii) A staff handbook defines use chemicals and mechanisms for protecting flora and fauna from same.

QUESTION 4: DURATION OF ACTIVITY

The request for further information seeks clarification as to "*whether the activity will occur for 8 months or 9 months each year*". This site will be developed as a location on which seasonal overnight visitor accommodation will operate for up to nine months of the year, September to May inclusive. It should be noted that the actual period of operations will be dictated by market demand for tours, but will not exceed nine months out of any 12 months.

The operating season planned is consistent with Tourism New Zealand's policy, initiated two years ago, to promote the two shoulder seasons so as to encourage a greater flow of international visitors into these non-peak periods, specifically Spring (September till November) and Autumn (March till May). To that end the national tourism marketing agency has ceased promoting the Summer season and is now dedicating its entire marketing budget to the two Shoulders (as they are referred to in the tourism trade) being Spring and Autumn. This is a national strategy for spreading the load being encountered as a result of sustained (and on-going) growth in international arrivals and is relevant given that the Applicant is predicting that 90% of its multi-day walks clients will be from overseas.

The planned operating season on this site also mirrors the terms and conditions of the original Lease for its Okahu Valley site issued by the Department of Conservation (August 1988, Page 5, Clause 12 as below) which specifies a season running from 1 September to 31 May.

COPY

11. COMMUNICATIONS

The Concessionaire may use radios to communicate when in Whirinaki State Forest Park, but may not construct or use telephones requiring wiring outside the lodge buildings or immediate surroundings of the buildings.

12. OPERATING SEASON

The Concessionaire may take clients on guided walks between the 1st day of September and the last day of May in each year during the currency of this Lease. During August clients may be taken into Whirinaki State Forest Park with the prior consent of the District Conservator.

13. SUB RENTING OF LODGES

The Concessionaire may rent its lodge facilities to educational groups as approved by the District Conservator, PROVIDED HOWEVER that in each case the Concessionaire shall have obtained the prior approval in writing of the District Conservator ten (10) days prior to the sub renting.

14. FORMATION OF TRACKS

The formation and maintenance of a new track from Central Te Hoe Hut to the park boundary will be financed by the Concessionaire, with the work being undertaken by the Department of Conservation.

15. ACCESS

The Concessionaire will not use the granting of this Lease as a means to prevent public access to Whirinaki State Forest Park over adjacent private land.

16. ANIMALS

Neither the Concessionaire, nor any employee, agent or client of the Concessionaire shall bring any animal (including horses) other than a dog under permit into Whirinaki State Forest Park.

17. VEHICLES

Neither the Concessionaire, nor any employee, agent or client of the Concessionaire shall bring any motor vehicle of any description, nor any wheeled vehicle off formed public roads in Whirinaki State Forest Park, nor shall they operate any such vehicle off formed public roads in Whirinaki State Forest Park.

Chris Birt
Director, Manaaki Group Holdings limited
30 June 2018