



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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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



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

Our National Parks are already vulnerable and suffering the effects of overuse particularly where tourist numbers are concerned, as you well know. In recent times Dept of Conservation and Government has sought to moderate tourist and user numbers through increase of fees on Great Walks. This Application to Build such a complex flies in the face of efforts to reduce those very numbers.

The campsites along this road are already full beyond capacity during the height of the summer season and the river over fished. To add this Accommodation Complex would most certainly compound this as well add to the ecological overuse of this area of New Zealand's Fiordland National Park.

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

I would hope the decision makers in this process would use wisdom and common sense in rejecting this process allowing this to go any further. Public confidence in the Dept of Conservations administration of our land has been ebbing for quite some time. It my view D.O.C have 'prostituted themselves considerably for long enough by allowing consent procedures and submissions regarding our backcountry and its welfare to be compromised by commercial and monetary interests. Issues such as the Monorail, the Haast-Hollyford Highway and other mining interests have gone way too far into legal process before being stopped or objected to. This, in reality, displays nothing more than money driven custodianship of our Natural Heritage rather than a genuine concern for our Biological & Ecological of New Zealand.

Eglington Valley is a fragile and valuable part of Fiordland National Park. To cause more duress to Fiordland through commercialisation is irresponsible and contradictory to the Values of the Dept of Conservation's own core values.

I would hope that further progression of this application be stopped immediately.

G. Your Signature

Date 26th June 2018

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



This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

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

Attention: Lisa Wheeler
Permissions Advisor

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is **5.00 pm, Friday 20 July 2018.**

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

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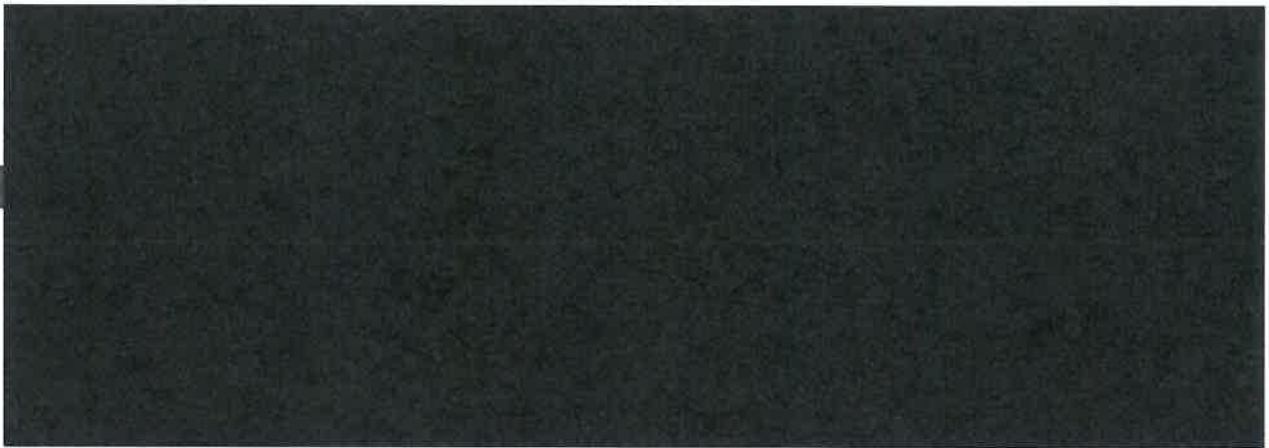
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I **Oppose** this Application.

E. Hearing Request

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

F. Submission

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

Location, it's location next to the Eglinton river and impact to the wilderness nature of the area.

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

My submission is that the proposed site is far too close to the Eglinton river, a renowned river in the area. I believe that the site would adversely affect the natural environment in the area and sets a new precedent as to the commercial impact on sites of significance.

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

Location of the site and it's affect on the areas wilderness mature.

G. Your Signature

A large black rectangular redaction box covering the signature area.

27/6/2018

Date

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Department of Conservation
Te Papa Ihirangi

COMMENT SUBMISSION FORM
Publicly notified application for leases,
licences, permits, or easements

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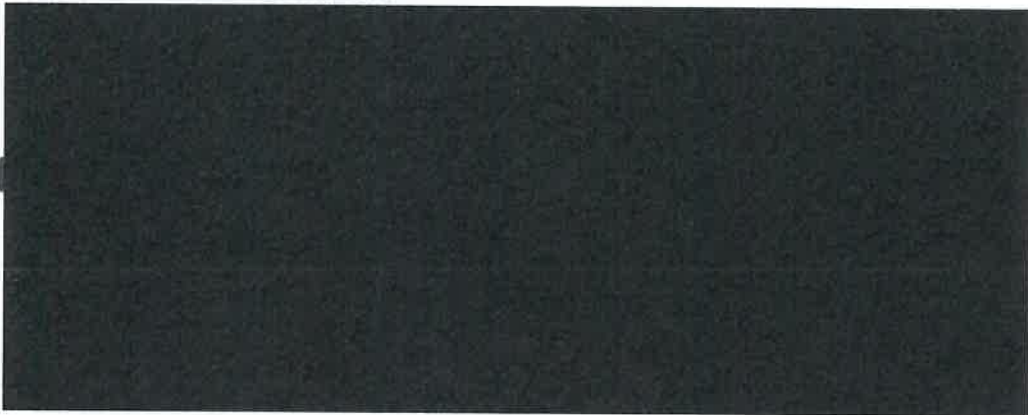
A. Permission Application Number and Name of Applicant

64171-600 - Park View Resorts Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

(In specific parts of the application that this submission relates to are:
proposed accommodation and associated services of the site indicated within Fiordland National Park

but I will speak if necessary

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

I do not believe that the National Park will benefit from this proposal. It does not lack for visitors and there is accommodation just down the road at Knobs Flat. With plans afoot to develop Knobs Flat further and potential development just outside the park at Te Anau Downs, not to mention the capacity of Te Anau itself, there are plenty of options for accommodation.

I disagree with the way that the onus seems to be on the public to oppose a development like this, rather than it being on the developer to explain how the development will benefit the National Park. Not the tourists. Not the owners. Not the Te Anau community. But the National Park, and the species who cannot write submissions and for whom the park was designated.

I have worked in the Eglington Valley for seven summers, specifically to study the native species there for DOC. I have frequently walked through the proposed area monitoring native birds. This area often holds mohua (*Mohoua ochrocephala*), tanitoria and is a foraging (and almost certainly a roosting) area for longtailed bats (*Chalinobius tuberculatus*). Short tailed bats (*Myotis tuberculatus*) maternity roost just across the river from the proposed site. Endangered black fronted terns (*Chlidonias albastris*) colonies have nested on islands in the river just (a couple of hundred metres) to the north of this proposed site, they are very vulnerable to nest disturbance from walkers or fishermen. Kaka (*Nestor meridionalis*), kiwi (*Procellariiformes novaezeelandiae*) and bellbird (*Anthracoceros melanura*) love the most beautiful mistletoe peninsula that I have ever seen, right where this track and building will be placed. While trees are covered with red mistletoe flowers, it is awesome to see it in flower, and would be a travesty to cut it down.

It is a beautiful place with healthy subpopulations of many native species, a rarity on mainland New Zealand. The reason that these species are here is because the New Zealand taxpayer have had their taxes paid to DOC, who has run trapping, poisoning and research programmes here since the 1990s, and more recently (2014 and 2018) massive 1000 operations to prevent predator incursions. Long term predator control has resulted in the groves of mistletoe and the wealth of birds that we now see. Without this long term investment by the New Zealand public this development (for private profit) would not be so desirable. 25 years ago when my bosses started work in the valley they used to remark on seeing a kaka as it was an unusual occurrence worthy of mention. Now it is no less worthy of mention, but you can hear kaka every day and hear them calling in the evening, it's gorgeous. This is mostly due to the traplines that run both sides of the river and are checked by hardworking contractors. Some of these traps have been funded by local businesses. Why should New Zealand taxpayers have the National Park that they have paid for over many, many years developed for private gain with NO conservation benefit.

I have also spent this last summer working for DOC counting visitors and checking DOC concessions on tour buses on the Milford Road. I can say with certainty that for the great majority of visitors to Milford Sound there is no conservation benefit to them traveling through the area. Small numbers are interested in the wildlife and conservation story, but the vast majority just want to park as close to the view and get a selfie there, and are more worried about where the nearest toilet or coffee is than making time to enjoy the wildlife and natural landscape around them. Seriously, I got more questions about toilets and rubbish bins than about birds or bats. I deeply question the theory that more people through creates more conservation advocates.

There are thousands of places for people to stay, but only one Fiordland National Park. Its value lies in its integrity and this must not be eroded piece by piece. Tourists will always demand more regardless of what you provide.

This site would be a beautiful place for accommodation. It already is. For hundreds of trees, shrubs, insects, spiders, birds and bats.

I would question certain parts of the proposal, specifically:

How does the developer plan to build an access track through the forest without cutting down trees over 60cm in diameter? Is it to be a walking track? Do you think people are going to carry their suitcases for 400m? What about the track necessary to get vehicles and equipment necessary for the build in to the site?

I have personally seen long tailed bat roosts in trees much smaller than 60cm diameter (though it is true that they do love old growth beech forest). And yes it is true that DOC will have to check every tree that is to be cut down.

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for the presence of bats, this will require at least 2 DOC workers paid for by NZ taxpayers, when they could be working on unavoidable matters of conservation importance. DOC paid Milford Road Rangers will also have to move people on from the proposed carpark to prevent freedom camping, as they have to do at every other conceivable parking spot along the Milford Road at present.

I question the relevance of the testimonial written by Roger Wilson who insists that Abbe will be able to make this venture a success. Her ability as a businesswoman is not in question. It is not relevant to the impact the footprint and running of the venture will have on the habitat it displaces.

I also have to wonder whether it would be long before we see Real Journeys offering a 'Path' option and buses dropping people here overnight. I am not sure if this kind of monopoly is permitted? But that is only a cheeky speculation on my part...

On Form 3b, page 6, Path suggest that their development will 'protect the natural values from large numbers of people'. The area is not currently subject to pressure from large numbers of people. I have only ever seen the occasional fisherman accessing this part of the Eglington.

Will people who are not staying at the facility overnight be able to access the forest and use the nature trails or will they be private? The development will bring more people and their impacts to this particular area of the park.

I believe that the National Park Management Plan is soon up for review and how DOC manages the large number of people travelling to Milford Sound will most likely change in this new plan due to the record numbers of visitors each year. It will need to be future proof, and may well change some of the statements within the present plan. Any future development should hold fire until the new plan is in place.

Most of the modifications referred to on page 7 of Form 3b are free viewpoints and carparks, provided at DOC's expense, for the benefit of all visitors, not just those who pay to stay at a private enterprise overnight. People are free to use DOC carparks and the walks for free all day. There is a big difference between providing something for free for everyone to enjoy and building a privately owned hotel with rooms that will cost \$300 per person per night.

Again on page 11, the photo of the Lake Maian carpark is not comparing like for like as the carpark is for the benefit of all, not just for paying guests of a private company.

Page 13: I would note that visitors already have the opportunity to view birds and bats in their native habitat, at almost any point along the lower Milford Road. This development would not be creating any opportunity that is not already present should people be interested enough to make the minimal effort. If they are not interested enough to make this effort then conservation benefit from having people view these species is likely to be minimal.

Page 16: I have to disagree with Professor Norton in the comments made on this page. I've seen bats sitting on the deck at Knob Flat houses and dogs in several guest cars on the Milford Road. Deer are often seen at Deer Flat campground and I am not sure where he has found evidence of moose presence being of benefit to native wildlife, but I am fairly sure that for every one that may put forward this proposal, there will be ten that find the opposite effect.

Page 20: Am I right in quoting that Path cannot use the buildings already in place (and recently up for sale at Te Anau Downs because "the expansive views of the Valley are blocked by trees within the National Park"? Really? Is that seriously an argument? We can't accommodate nature loving people here (and we are building this accommodation specifically to spread the conservation message) because there are too many trees in the National Park?? Really??

Page 23: There is no plan given to show how fuel would be stored on site. There is no hazard management plan or emergency response plan or provision for clean up should a spill or fire occur. I know that the applicant has said that once consent is given then these will be provided, but details of fuel storage have been specifically asked for in the application as part of the application process and they have not been provided.

Page 26: "this would be no different from existing accommodation facilities in the National Park, including DOC huts..." I disagree. The "profit" (if any) from DOC huts goes to DOC work managing the conservation estate, not into a private company's bank account. And if I understand correctly, until the price hike this year on the Great Walks, some hut bookings were not covering the cost of maintaining the huts and walks and were costing DOC money. In order to keep the experience affordable for everyone. No private business would do this. The private huts on the Milford Track and the Routeburn are a different story...

Page 28: I am concerned that about the same amount of text has been given to "potential disturbance of soils, vegetation, invertebrates, frogs, lizards and birds" as to "potentially adverse visual effects"...

Page 28: I question whether a track 1m wide can safely accommodate a quad bike.

Page 31: I am concerned that the grey water/black water drip system proposed is unsuitable. Soils in the Eglington Valley are not deep and are built on top of the stones from the old path of the braided river bed. The Eglington River goes up and down like a yo-yo with ~~high and low~~ ^{high and low} ~~high and low~~ ^{high and low} that rain runoff from the surrounding area, due

in part to him (or in the case of the sides of the valley, no) soil, flows straight into the river with little to filter it out. As John Coates Ltd Appendix 3b A b states, a septic tank would be more appropriate for containing waste water (although it would be less than desirable due to initial disturbance to the habitat from digging a septic tank)

Page 35: The economic benefit of tourists is not in question, the conservation benefit of this application is.

Page 35: I disagree that building new accommodation facilities on previously unbuilt parts of the National Park for private benefit will decrease the impact of tourists on said National Park. I do not agree that creating accommodation for 40 visitors will reduce the tourist pressure points (at peak times over 400 people an hour using the Otter walk) for the Milford Road (page 34).

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

I would request that the proposed development was rejected

G. Your Signature

A large black rectangular redaction box covers the signature area.

26th 2018
Date

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B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

I oppose the application in its entirety.



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

The proposal is inappropriate in a National Park and especially in this setting.

The application will have adverse effects on the natural environment incompatible with the rest of the area's natural values and reasons for being protected.

Adverse effects will include noise, air quality (open fire smoke through the valley), loss of vegetation, amenity and visual effects, habitat, and species and ecosystem impacts, that can't be sufficiently mitigated or remedied. The high standard of current amenity and protection in the area means the habitat and wider environment is highly sensitive to the impacts of human intrusion. The base line in the area is one of isolation and solitude. Built structures and formal inhabitation and accommodation will diminish those values. This is in both effect, and in the way people will view current National Park protections – affecting the 'sacred' nature of these places and the rules designed to protect them. Approving this application will negatively impact on the quiet and wild nature of this place, but also how New Zealanders can see National Parks' protection working (in the negative).

This valley is valuable for its undeveloped and remote nature, approving this application will lead to the another strike in the 'death by a thousand cuts' that would lead to cumulative loss of the very special and vulnerable quiet, solitude and environmental values of the place. It's a special place in the world, too precious to impose upon, and we should be able to rely on National Park protection to ensure it's not further compromised.

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

The application should be declined

G. Your Signature

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28/6/18
Date

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D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

All of it.

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

I acknowledge that the proposal has made some effort to mitigate the environmental impact of the accommodation, and one accommodation business in the Fiordland National Park has relatively little environmental impact overall. However, I strongly believe that the concession application by Path New Zealand should be declined, on the basis that it sets a precedent for future development and it is privatising our National Park for the benefit of business owners, and not the New Zealand public.

If permission is granted to Path New Zealand to build the accommodation, what basis does DOC have to decline any future requests? At what point does the development of Fiordland National Park stop? Do we want our National Parks to be full of commercial enterprises, and the road to Milford Sound to be one of commercial enterprise, full of accommodation, and perhaps even food and retail options in the future, or one where New Zealand's natural features are preserved and left as nature intended?

Given New Zealand's tourism boom, it is highly likely that other developers, or even Path New Zealand, want to build more accommodation in Fiordland and our other national parks. Tourists come to New Zealand because of the unspoilt nature of National Parks, and commercialising these will be to nature's and tourism's detriment.

There is an obvious need to provide quality accommodation for tourists. But why can't Path New Zealand build outside the National Park? Beautiful forests and quality views do exist on the outskirts of the National Park. This is public land, and it should be available to all New Zealanders to use and enjoy, and not sectioned off and used by commercial enterprises.

I am also concerned that a cash-strapped DOC will come under pressure to grant such concessions purely for the financial benefit, especially as DOC is having to provide and maintain significant tourist infrastructure, without necessarily having increased funding to pay for this. DOC should assess the application without this benefit in mind, but this can be tough to do.

There is no apparent benefit to the New Zealand public if the accommodation is built. We provide some of our pristine National Park for a few jobs and visitor nights? And this is a benefit that would be still be realised if the accommodation was built outside the park, on public land. Clearly Path New Zealand is building the accommodation for their own financial gain – to take advantage of the National Park location to provide an attractive accommodation option. If we are going to allow private enterprises to build in our National Parks, there has to be a significant benefit to the park, to conservation, and to the public and there is virtually none in my view.

DOC has a fantastic opportunity in this application to determine the type of National Park Fiordland will become under increasing tourism pressure. By declining this application, DOC sends a strong message that nature, conservation and preserving our National Parks takes priority and that our National Parks won't become polluted with commercial enterprises benefiting from a public resource and providing little benefit to conservation and the New Zealand public.

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

I would like the concession application to be declined.

G. Your Signature

A large black rectangular redaction box covering the signature area.

28/06/2018

Date

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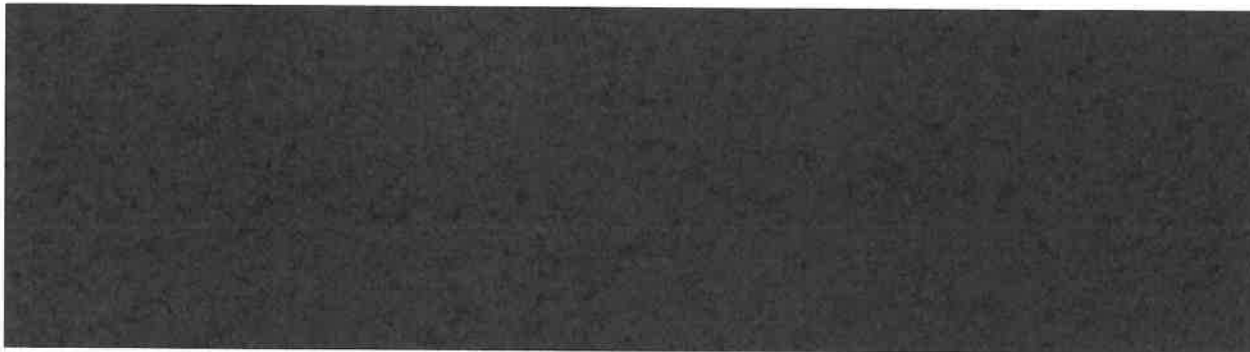
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C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

All of it.

6

6

2

6

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

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2

6

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

I would like the concession application to be declined.

G. Your Signature



Date

28/06/2018

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D. Statement of Support/Opposition

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

E. Hearing Request

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


F. Submission

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

Oppose the development

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

The national park should not have any further private commercial entities running. It should be owned and run by DOC and there is plenty of accommodation available in Te Anau. The National Park should be something that's looked over and not commercialised, similar to what has happened in Banff National Park in Canada.


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

Do not want the development to go ahead.

G. Your Signature



03/07/18
Date

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B. Name of Proposed Activity and Location(s)

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C. Submitter Information-

 submitting on behalf of a business, community group, etc.):
WYNDHAM ANGLING CLUB (INC)

D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

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F.Submission

We probably object to all parts of the application.

Our submission is:

- 1. We are against public land being used for private benefit especially as it restricts or halts public access to the said land.**
- 2. The application is not clear on many points**
 - [a] area of land involved**
 - [b] advertising signs on the Milford Road**
 - [c] no detail of "10 to 20 small to medium trees would be removed"**
 - [d] no mention of how many helicopter flights needed for construction**
 - [e] lack of detailed map showing sewage drip lines**
 - [f] no mention of earthworks for water pipe line**
 - [g] data link, underground or by aerial connection i.e. mast**
 - [h] no mention of development being visible from the river banks**
 - [i] possible exclusive use of carpark, no consultation detail**
 - [j] lack of any measurements of any structures**
 - [k] lack of any specific building plans**
 - [l] concept drawings depict large north facing glass walls, will these give off glare up the Eglinton River**
 - [m] no scale of distance on any maps**
 - [n] access track only for quad bikes. Get real, a 20 minute walk in Fiordland rain will soon force owners for a departure of plan for a road. Let's be honest.**
 - [o] however it is dressed up, this is just another motel in an undesirable location**
 - [p] from an angling club perspective, the probable conflict of anglers accessing the river from the Dore Pass Route being cut off from their days fishing by anglers coming from the proposed development.**

What outcomes would we like to address in our submission?

We ask that the application by Path to build this development be declined.

We cite the points in our submission as great reasons to decline.

The obvious lack of detail should alert those in authority that this is an ill-conceived idea.

If by any chance that a concession is granted we would ask that a \$1,000,000 Bond be placed on the Path Company. This is to ensure that when the venture fails there is a fund to remove the infrastructure. Our reason for this is the Seddon Memorial Hospital demolition debacle in Gore where ratepayers had to pay for the clean-up and the recent Taha Ouvea dross storage where public money had to be forthcoming to remove it. Not again in Southland!

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8

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

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

G. Your Signature



WYNDHAM
ANGLING
CLUB (INC)

06 - JULY - 2018

Date

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



Submission in Relation to Path NZ application for Concession to Build Accommodation, within Fiordland National Park.

Firstly I feel, it would be of benefit for me to give the department staff considering this application a summary of the history of pre-existing accommodation within Fiordland.

I have worked (until recent retirement) in Fiordland for over fifty years, within tourism and facility management, and have a deep understanding of Fiordland History.

The most recent accommodation, built within the National Park, was associated with the construction of the Hump and Kepler Tracks, five huts sleeping up to sixty people.

Prior to this, there was major accommodation built at West Arm and Deep Cove as part of the Manapouri Power Scheme construction. At the end of the project a hostel for single men was built at West Arm.

A hostel building at Deep Cove was made available for the use of Southland School children on the suggestion of the Late Sir Les Hutchins. This building has been replaced with the existing building in the 1980s. This hostel was built and operated by Fiordland National Park Board / Lands and Survey until the mid 1990s, it was then sold for \$1 to the Deep Cove Hostel Trust and if it was not for the company set up by Sir Les Hutchins it would have ceased to exist many years ago.

Boarland Lodge, was built as a construction camp, just on the border of the park and has been operated by a trust since the power scheme finished for school use also. This facility has been rebuilt over the last thirty years, with the support of Southland Service Clubs. Southland schools have been exceptionally well provided for, with both these facilities and children have had a great appreciation of our National Park for the last forty years.

During the early 1960s Fiordland National Park Board established a series of huts around the Fiordland Lakes for the use of hunters and fishermen, a total of seven new huts were built, to add to existing huts built by tourist operators using the lakes since the late 1890s

During the construction of the Milford Road in the 1930s, several sites along the road line had sizable construction camps, built to support the large workforce. The existing facilities at Knobs Flat, Gunns Camp and Milford Lodge, at Milford Sound, all started from these camps. They have been upgraded and new facilities built on the original sites. A tourist facility was for many years operated at Cascade Creek, until the creek management became untenable.

The Milford, Routeburn and Hollyford Tracks have had accommodation built over the period from the 1880s to the mid 1940s. These started off being very basic bush huts, but over the years have been rebuilt to be more in line with small hotels. The Fiordland National Park Board also built a series of huts along all these tracks to cater for non guided walkers, again these have been upgraded and extended over time to better cater for today's users. Not everyone has the ability or time to walk these tracks, so a facility similar to any of these modern lodges, just a short walk from an access point would be of benefit.

P

9

The Milford Hotel was established by Donald and Elizabeth Sutherland, to cater for Milford Track walkers, this was replaced in 1928 by the NZ Govt as a hostel to cater for the track walkers. It was replaced again in 1954 by the Govt, to bring it up to a high standard for the new wave of tourist using the newly opened Milford Road. It was sold off in 1987 and is today used only for the guided Milford Track walkers last night. This is one of the prime sites within Fiordland and is not use to anywhere near it potential. Milford Sound has very limited land available and it is at present, not best used.

The application from Path NZ will be the first ever application for building accommodation within Fiordland National Park, that does not have any association with historic tourism links. At this point I would like to quote an early Fiordland Tourist Pioneer, the late Mr Wilson Campbell, "For 85% of the people using the road to Milford, this is likely to be, the only wilderness experience they will ever have", this is in my view, so very true. Some can stay at the existing accommodation along the road or camp at the DOC campsites, but the services planned by Path NZ are not available at any other provider along the road.

It will give clients a similar experience to walkers on the Great Walks, but be available, after just a short walk to a site that cannot be seen from the Milford Road, so in a sense, they could be anywhere in Fiordland.

The Department of Conservation has spent millions of dollars, working to make the biodiversity within this valley unique, having somewhere for people to stay in nice facilities, so they will be able to appreciate the great work the Department has done. This would be a win-win for all concerned and could even provide more support for the Departments work. The operators could set up a programme, similar to the very successful donation project for biodiversity work, carried out by the hut staff at Lake Mackenzie Hut.

The Milford Road is the shop window for Fiordland National Park and was in the early National Park time a place Rangers spent a lot of time relating to users. This has declined since the exception of DOC. The existing tourist operators have in some cases taken over this very important role and the concepts of Path NZ is so much in line with early park management policy.

I support the concept planned and it would provide any experience that is both required for modern tourist and not provided by any other tourist operation today.



(P)

(9)

Lisa Wheeler

From: [REDACTED]
Sent: Friday, 13 July 2018 7:34 p.m.
To: DNSubmissions
Subject: FW: Submission Path NZ - correction
Attachments: 20180713145427466.pdf

Hi,

I have made a typo in point one of the submission that was emailed today. I have marked the word in bold below as it should be. It previously said "should not go".

I would be grateful if it could be corrected.

1. There should be no private commercial buildings in national parks of such a fragile nature as Fiordland. The park and Te Anau both have hurdles in coping with rapid growth in tourist, worker numbers and house building. The natural environment, including Lake Te Anau, are under threat. Surely it would be reasonable to adopt a cautionary mode and state that peak development has been reached in the park and efforts should now go into minimising the impact of humans on the natural environment.

2.

Regards [REDACTED]

[REDACTED]

10



This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

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

You may also mail your submission to:

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

Attention: Lisa Wheeler
Permissions Advisor

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is **5.00 pm, Friday 20 July 2018.**

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.



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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

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

F. Submission

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



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

About one third of NZ is public conservation land the other two thirds are land set aside of commerce and towns. Having such a large area set aside for conservation is what makes NZ special. This proposal and others like it attempt to push back and blur the boundaries of the land set aside for conservation. Humans have already exploited 2 thirds on NZ, we have to vigilantly protect the last third left.

Public Conservation Land is a form of commons set aside for all New Zealanders. Path LTD aim to exploit public conservation land for private profit or gain. Accommodation which costs \$300 per night is above the price most kiwi's could afford making this accommodation site elite. Why should one private accommodation provider be allowed to build and operate in the Fiordland National Park when most other nearby private accommodation is in Te Anua.

Reading Path's application almost none of the profit generated by Path LTD goes back to conservation or to the public. It goes to a small group of shareholders, so why oh why should Path be able to do this?

The other concern I have is that this sets a precedent. If Path NZ can build their hotel/lodge inside a National Park then other operators are going to want to exploit Public Conservation Land also.

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

That Path NZ application is turned down. That DOC do not consider applications like this in the future and instead focus on protecting our wild spaces.





G. Your Signature



8.7.18
Date

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



Lisa Wheeler

From: [REDACTED]

Sent:

Monday, 9 July 2018 5:34 p.m.

To:

DNSubmissions

Subject:

Eglinton Hotel

Hi there

I see FMC are opposing this so I won't go into detail with my submission.

The proposal must be opposed.

This is a National Park and I see few benefits for us, the owners, of the National Park for someone to make money out of a hotel situated there.

Roads, trees removed, noise, visual disturbance of the hotel and it's associated buildings and waste disposal... it's just not worth the trouble. And all in a place that is supposed to be preserved in perpetuity for all New Zealanders. This is just a foot in the door for all those other entrepreneurs who would just love a similar opportunity to turn it into some green Yosemite.

Drastically cutting back the numbers of tourists - not kiwis - from over whelming the valley and Milford should be where the thinking should be going not wasting time and money on this sort of proposal.

Thanks

(11)





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Do not include page one.

A. Permission Application Number and Name of Applicant

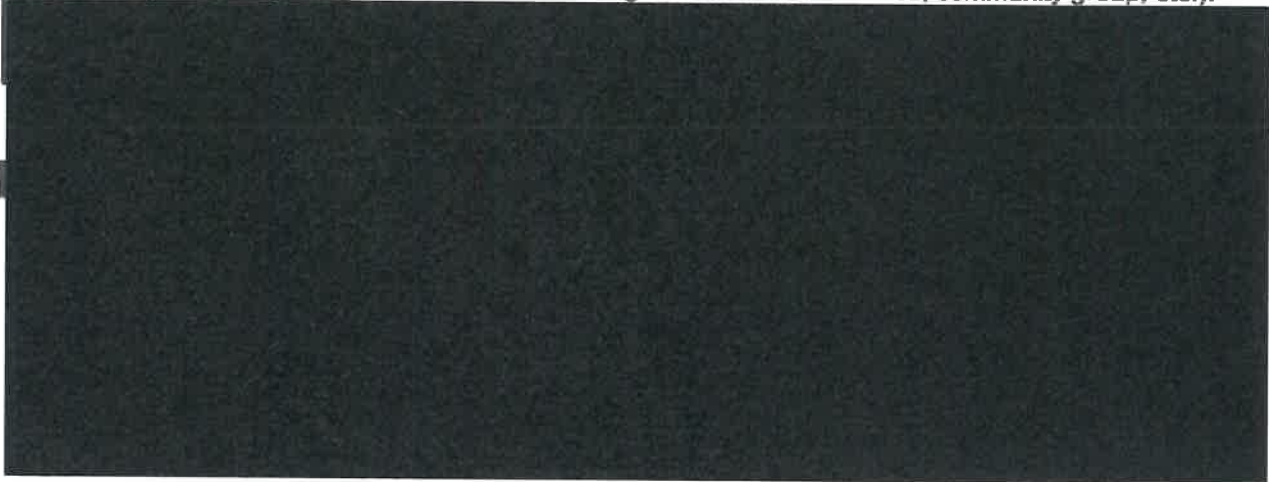
64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-

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



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

Location within The Conservation Estate

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

There should be no commercial buildings in this valley. Very scenic, Fly fishing river may suffer. Stes precedent.

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

Rejected on grounds that there should be no private concerns entertained on Conservation Land of this significance.

G. Your Signature



12

Printed name of submitter or person authorised to sign on behalf of submitter
10/7/2018

Date

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

12



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

64177-ACC - Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

If it is held a suitable venue ^{ie. Iwercau / Queenstown Te Anau}

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

F. Submission

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

1. Accommodation in park and adjacent areas
2. Transport
3. Visitor numbers and wealthy demographic
4. Detrimental effects - visual / noise
5. Traditional park values.

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

- ① To allow private interests to use National Park land for private profit to the detriment of the environment to pander to a wealthy elite sets a very negative precedent and is against the Fieraland National park management plan and Park Policy.
- ② This adds further unacceptable pressure on a Park already under pressure. We are told the target market or wealthy visitor has "limited time" This will place further demands for greater access to helicopter flights, jet boats, buses and car parks. Already pressure from helicopter flights is unacceptable from both a noise and ease of access point of view to mountaineers, hunters, fishermen, New Zealand families, and discerning overseas visitors. Flights and the number of them is already a serious public concern
N.B. SEE second page of our submission

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

We oppose the proposal in its entirety!!

G. Your Signature



11/7/2018
Date
11/7/2018

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

① Accommodation
② Detrimental effect
③ Traditional
④ Park Values

Why submission is (include the reasons for your views):

- ③ There is already significant tourist accommodation in Tekapo and plenty of private land on the park boundary to build more accommodation.
- ④ The proposal is visually unacceptable and the purpose is not consistent with the spirit and philosophy to provide a wilderness experience for all New Zealanders forever!! Especially the Knob's Flat area!
- ⑤ The economic and tourist aspect of the Park should always be secondary to the primary purpose of the park.
- ⑥ The impact of this type of tourist development is far worse than that of other park users i.e. those using tents, existing huts and walking to their destinations.

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

G. Your Signature



Printed name of submitter or person authorized to sign on behalf of submitter

11/7/2018
Date 11/7/2018

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



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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

- conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry
- directly contradicts policies for accommodation in section 9 of the [General Policy](#)

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

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

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

I oppose this application.

National Parks are taonga. The less human impact and structures, the better. Also, this structure will not benefit the majority of people visiting the park. If we are to build more structures, it should be accessible to all and to help preserve the environment. This lodge does neither.

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

G. Your Signature

(2)

(15)



11 July 2018

Date

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

(21)

(15)



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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-

[Redacted area]

D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

The lease and licence that is being sought does not comply with the standards NZ national parks should be run. I oppose the lease and licence for this facility.

21

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

I love the wild remote and rugged landscape that is Fiordland national park. IT is my favourite place in new Zealand and even though I am not able to go there often I cherish the place. The one main reason I love it so is that you can feel soo remote once you leave the roadside and walk directly into the wilderness. To stay the night in that wilderness you don't have to be well off you need to hike and toll to stay in this special place, join the climbers at homer hut or the sandfiles at guns camp. This new development is not for new Zealanders it will only benefit but a few new Zealanders is it worth scarring this delicate landscape irreparably. We would inevitably be setting a commercial standard that our most sacred land is up for sale to those who have the \$\$\$\$. This completely goes against the purpose of maintaining the national parks. Below are some more very valid points to consider which I agree with.

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

this development should not be allowed to go ahead it contradicts the rules and policies we set up to protect these sacred places so why let them in?? don't bend the rules because no one will end up having any respect for them.

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

No specific conditions to be met only that the development does not proceed at all.

G. Your Signature



_____ 11-07-18 _____
Date

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

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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

Location of the site and status of land.

While I applaud "Path" for wanting to build a luxury lodge to accommodate visitors to Fiordland National Park, I disagree with locating such development in FNP itself. This application is not consistent with the general policy for national parks or the FNP Management Plan. There are places outside of the FNP where such development could be based.

Adverse effects on visual, noise and light pollution

The applicant tries to play down the visual, noise and light effects of the proposed accommodation, but the reality is that these adverse effects will be present.

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

Location of the site and status of land

There is no reason for this luxury lodge to be located within the boundaries of Fiordland National Park. There are already plenty of accommodation options within FNP such as Knobs Flat, Gunns Camp, Milford Lodge, Mitre Peak Lodge as well as DOC huts and guided walkers lodges on the great walks.

Ms Hutchins quotes Professor Norton's report *Path: Vegetation assessment & general comments on terrestrial environmental impacts*, saying that "having a more permanent human presence in the area should help restore and protect the forest and birdlife". This is fundamentally wrong. It is the human expansion into the wilderness that brings loss of natural habitat for native species and introduces pollution and predators that are detrimental to our native flora and fauna.

Rather than introducing more islands of civilisation into the National Park, we should make better use of those areas already sacrificed for the comfort and convenience of people.

Adverse effects on visual, noise and light pollution

Visual, noise and light pollution will extend over the entire lifetime of this project and not just be limited to the building stage.

The proposed vegetation clearance on the site of the building and the carpark means the site could be in view of those walking up the Dore Pass. Even if the buildings would not be visible to people passing by on the Milford Road, the smoke from log burners and diesel generators would be visible from any point in Eglinton Valley and beyond. And of course the exclusive carpark will be there in full view from the road, attracting curiosity of some passers-by as to what purpose it serves.

The generator noise would be a continual, and add to it intermittent, but equally annoying noise of a quad bike, not to mention helicopters delivering goods and taking away waste. Some customers would probably arrive by helicopter as well adding to the already busy air traffic in this area, particularly over the summer months.

Light pollution could be substantial in winter months when days are short, if the lodge is to operate whole year round. In any case artificial lighting after dark may have adverse effect on local fauna.

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

I believe that this application to build and operate accommodation in the Fiordland National Park should be declined.

G. Your Signature





Date: 12 July 2018

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

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

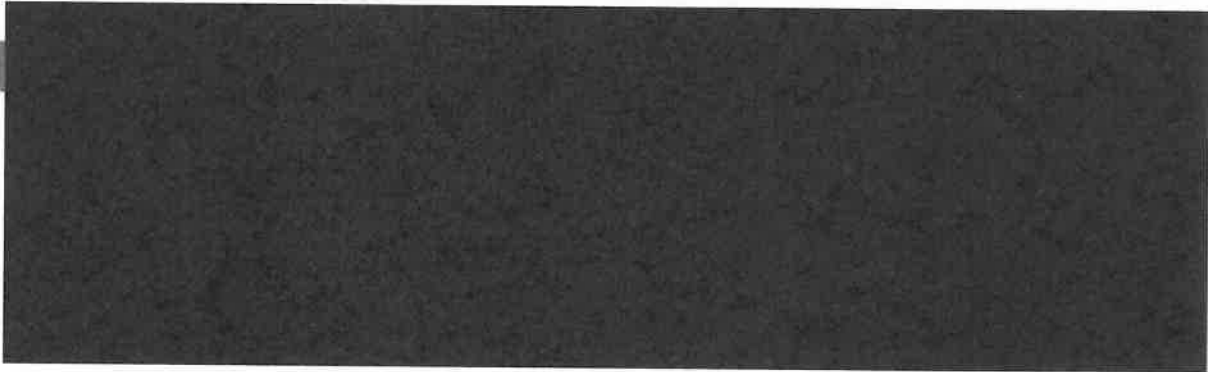
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

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

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

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

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

This is conservation land. Building on it is not conserving the land.

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

Reject the entire application.

G. Your Signature



12 Jul 2018

Date

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

18

18

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

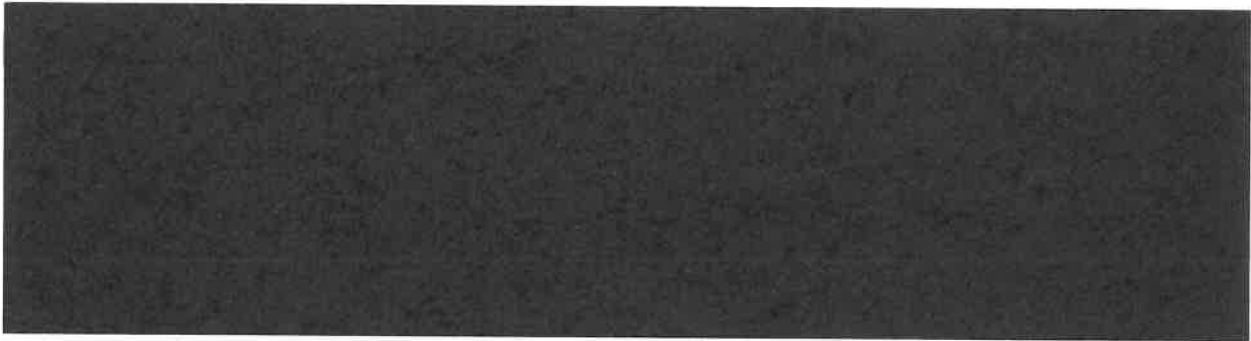
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

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

F. Submission

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

I object to the granting of an exclusive lease on DOC conservation land.

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

- conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry

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

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

The application be declined.

G. Your Signature



12 July 2018

Date



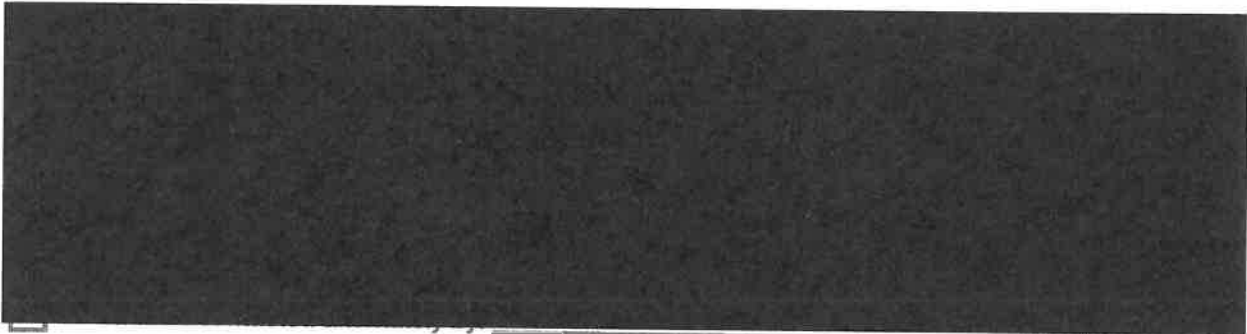
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

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

F. Submission

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

A concession to lease land to build and operate a commercial structure in Fiordland National Park, including the construction and continued operation of;

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

es

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

I believe the proposal must conflict with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry

I have read Chapter 9 of the General Policy for National Parks 2005, and believe the proposal is contrary to the intent of policies for accommodation.

I have read the Objectives for the Milford Road contained in the Fiordland National Park Management Plan and believe the proposal is contrary to this plan.

The Fiordland National Park is so highly sought after and the last place we should allow death by a thousand cuts - identifying a 'market' is not sufficient reason to satisfy demand within the Fiordland National Park.

The township of Te Anua has infrastructure, services, support staff, zoned land and amazing views. The economic benefits of \$300 per night accommodation would be felt more widely in or on the boundary of Te Anua.

I think that road safety and safe visitor opportunities along the Milford Road will be further compromised by additional vehicles accesses and the necessary vehicle movements of staff and visitors to and from this proposal site.

This section of the Fiordland National Park is not only experienced from the Milford Road, but also from above and potentially from the river. While it may be out of sight of the road, the proposal will not be out of sight.

It is unnecessary to create a new 'modified site'.

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

I would like the application declined in its entirety. I would like the declining of this application to be strong enough to send a message to other would-be applicants that the Fiordland National Park is not available for exclusive private use, irrespective of 'markets' or tourism experience

G. Your Signature



12/7/18
Date

Please complete this form and send to DNSubmissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, PO Box 2944, Matarua Place, Timaru 4868. Attention: Lisa Wheeler, Permissions Advisor

05

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This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 178C and 49 of the Conservation Act 1987.

Notes to Submitter:

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

You may also mail your submission to:

Director-General
c/o Department of Conservation
PO Box 5244
Moray Place
Dunedin 9088

Attention: Lisa Wheeler

Permissions Advisor

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is **5.00 pm, Friday 20 July 2018.**

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

25

21



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

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

PLEASE REFER TO ATTACHED



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

15

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Your Signature



7/7/2018
Date

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

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21

SUBMISSION ON APPLICATION 64177 ACC - PATH NZ LTD

I oppose this application due to the following:

1. I consider this application for a commercial tourist lodge to be developed within the Fiordland National Park is incompatible with the Conservation Act 1987, which makes it abundantly clear that this type of activity is well down the pecking order of what is appropriate within a national park. It is clear within the Act that recreation is subordinate to conservation, and tourism is subordinate to both conservation and recreation. Therefore if this application were to be approved it would set a dangerous precedent for similar commercial ventures to be permitted on conservation (public) land. Te Anau Downs, which is outside the Fiordland National Park, is the most logical site for such accommodation where a loop nature trail has already been established around Lake Mistletoe.
2. Continuing on regarding the Milford Road, at present there is a comprehensive study being undertaken (Milford Opportunities Project) which, as well as a master plan being developed for Milford Sound, is also looking at future appropriate development along the Milford Road. This application, particularly its exclusive carpark for thirty vehicles, could compromise the findings of this inter-agency initiative.
3. This application could also compromise on what MDA is intending for the ex MOW depot at Knobs Flat about 4km south of this proposal. On this already modified site the existing accommodation is to be upgraded and expanded in the near future so that more visitors will be encouraged to experience both earlier and later cruises at Milford. This is a sensible and logical venture and surely dovetails into the Milford master plan.
4. The application discusses the feedback received from appropriate stakeholders; however, there is no mention regarding the position the Southland Conservation Board has taken on this proposal. I consider that this is extremely relevant as the Board has a statutory role in the implementation of the Fiordland National Park Management Plan.
5. The physical attributes that dominate the surrounding landscape of the proposed commercial lodge include a spur line that extends out from the higher land to the east. The axis of the spur line is orientated in a west and east direction. To the south a dip slope falls directly down to the Eglinton River. Towards the north a terrace riser falls gently to a floodplain that borders the Eglinton River. Periodically incising through the floodplain are spring-fed streams that wind their way towards the river. The character of the river adjacent to the proposed lodge is generally multi channelled that helps to form numerous braid islands and gravelly bars. In a wider context the river's channel includes a sequence of short riffles, long flat pools and deep corner holes that typically feature beech log jams. A boggy swale gully runs parallel with SH94.

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6. The applicant's plant ecologist describes the vegetative patterns comprehensively with the spur line being dominated by an uncomplex beech community, while the terrace riser contains a subtle mixture of native and introduced grasses. As correctly stated in the application, the Eglinton valley was lightly grazed during the summer months until about thirty years ago. Visually the native and exotic grasses fuse together with signs of reversion back to a natural state becoming more obvious. The hard edge that defines the exterior margins of the beech forest is due to this shallow terrace riser being a cold air drainage zone. This is supported by the consultant ecologist who commented that a full plant survey could not be carried out because of the frost cover, and a provided photograph clearly shows ice needling and permafrost. The actual site for the lodge is located on fragile moss/lichen patterned ground, which is inherently difficult to reinstate after the ground's crust is disturbed.
7. A list of birds that were observed during fieldwork has been provided. This list is incomplete, as I have observed a localised population of rifleman in the mature red beech stand along the spur crest. The introduction of more human activity in the area, e.g. regular helicopter movement, would surely have an adverse affect on this small, discreet forest bird. At the southern end of Knobs Flat there is a population of mohua; it is not known if there have been any recorded sightings of this threatened native bird further north towards the proposed site for the commercial lodge. Occasionally both kaka and NZ falcon can be either heard or seen flying in the vicinity of the proposed lodge. In spring, the long tailed cuckoo has been heard along the margins of the beech forest near the Eglinton River.
8. I consider this tourist venture to be completely incompatible with the existing traditional recreational use of this section of the Eglinton valley, this being backcountry angling. The mid reaches of the Eglinton River are treasured by anglers due to the overall sense of peace and feeling of remoteness. At this point the river averages about 1km away from SH94. An accompanying report suggests that a mitigation technique to help screen the tourist lodge from traditional recreation users is to plant shrubs along the river's margins. This would be impractical owing to the inherently slow growth rate of shrubs in the valley floor, with local entanglements of mingimangi being about 1 metre in height. These shrubs could be at least fifty years old. To avoid browsing, the screen planting would probably require protection sleeves; this would look too contrived in this natural setting.
9. Furthermore, the "domestic" elements associated with this proposal would have an adverse effect upon traditional recreational users. The cumulative effects include:
- The inversion layer of smoke from the open fires as shown in the sketches of the proposed tourist lodge.
 - Frequent helicopter activity.
 - Miscellaneous signals of habitation, e.g. revving of quad bikes.
 - Noise from diesel generator.

- Voices of guests using the proposed nature trail that encircles the spur crest.
 - Informal tracks being created between the tourist lodge and the river margins.
 - Introduction of substantial built forms into a natural environment where at present there are no-man made elements except predator control markers.
10. The application states that the proposed tourist lodge is far enough away from SH94 not to hear traffic noise, and to be able to hear the river and birdsong. In reverse, the traditional recreation users would be exposed to noise from human-induced activities associated with a tourist lodge.
11. By targeting guests with a *high disposable income* it is considered that the location for this venture is impractical owing to the fact that many of the guests may not be equipped to walk 500 metres, with their luggage, to the lodge, not to mention the added inconvenience associated with inclement weather and clouds of sandflies. The access track would have to be of shoe standard, e.g. hard metal capping. Low LED lighting would have to be provided from the carpark through the beech forest to the lodge. No details are given on how fire and emergency services would have rapid access to the lodge. No site for a helipad is located on the provided diagrams. The proposed exclusive carpark for thirty vehicles will require a substantial number of mature beech trees to be removed along SH94. This will result in an unsightly indentation in the existing scenic avenue of trees. In addition, removing the edge beech trees that normally have a wider root plate will make the interior trees more vulnerable to wind throw. This phenomenon is noticeable where improvements to SH94 has included the removal of large edge trees.
12. Lastly, I consider that this application is fundamentally flawed. Although a plant ecologist has provided a report I consider that an assessment should have been carried out by a suitably qualified person to evaluate the landscape/visual impact this proposed commercial venture would have on the surrounding natural environment. I consider this area is high in natural character, which can be described as the expression of the natural traits, patterns and processes in a specific location. It is my view that this is a visually sensitive area, making the domestication of the site completely inappropriate, with the natural "feel" of the mid section of the Eglinton valley being compromised.
13. In conclusion, I consider this application should be declined in its entirety.


7 July 2018

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

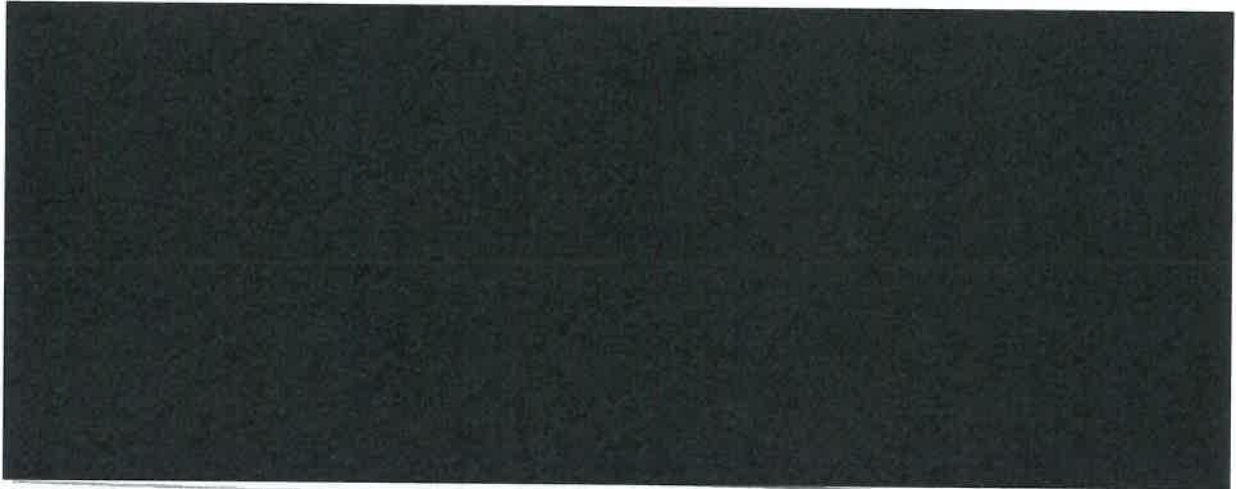
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



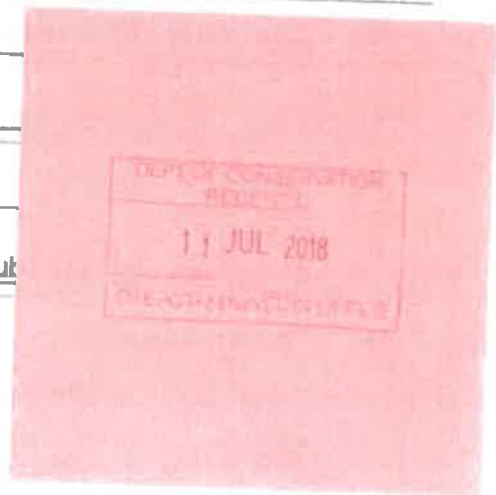
D. Statement of Support/Opposition

(circle one) I / Oppose this Application.

E. Hearing Request

(circle one): / Do Not wish to be heard in support of this sub

F. Submission



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22



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

A. Permission Application Number and Name of Applicant

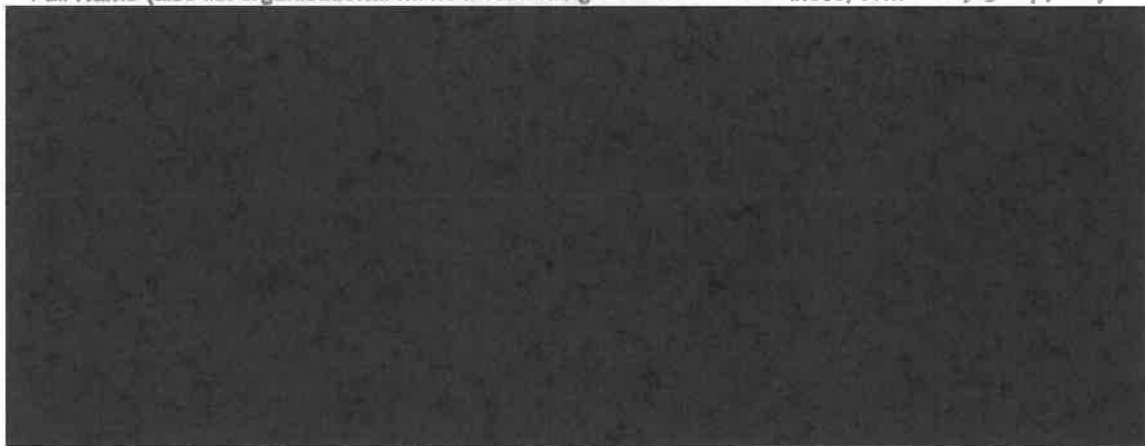
64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-

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



D. Statement of Support/Opposition

I (circle one) / Oppose this Application.

E. Hearing Request

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

F. Submission

55

22

The specific parts of the application that this submission relates to are: Location, Setting a precedent, Tracks only for private use

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

We have been involved in Fiordland with the Department of Conservation for many years either on work programmes or as volunteer hut wardens on the Hollyford and Kepler track. We also have spent time tramping in the area over the years.

We like the Path NZ concept but feel that it could be located outside the park boundaries because the applicants application is for privatising a small area of the park. It would appear from the application that the nature walk tracks plus the car park is for private use only. We feel this is contrary to the national parks policy of public ownership.

If this proposal is accepted by DoC and the venture is successful, Path NZ has suggested that they may plan further sites within the park. The reason tourists come to this part of NZ is the appeal of the park as an unpopulated and mountainous region. It would be preferable if accommodation was provided outside the park boundaries to maintain this status.

We support comments made by Federated Mountain Clubs and Forest and Bird in relation to this application.

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

We totally oppose this application in its present form on this site within the park.

55

22

G. Your Signature



9/7/2018.
Date

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

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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

Whole application

85

23

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

This application should not be supported.

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

I wish to see this application in entirety declined

G. Your Signature



Date 12/07/2018

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23

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

Lisa Wheeler

From: [REDACTED]
Sent: Thursday, 12 July 2018 8:59 p.m.
To: DNSubmissions
Subject: Objection to Eglinton Build
Attachments: [REDACTED]

I

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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-

[REDACTED]

D. Statement of Support/Opposition

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

(25)

(24)

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

F. Submission

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

The building of the lodge and its associated road, parking etc - the whole project

My submission is [include the reasons for your views]

I am objecting to the whole of this proposal. Our National Parks are famous globally and attract so many tourists because we protect them from development. They are paid for by tax payers such as myself and we do not want to see them leased off to private developers who will make money from rich tourists while most Kiwis will never get the chance to stay in them, yet it is the New Zealanders who will suffer the spoiling of one of the more accessible wild valleys. As well as the scenic costs there is the loss of habitat and increased disturbance to wildlife. It is not fair to past and future generations who have fought for their establishment and paid for the ongoing costs of the running of National Parks to effectively sell them off to a business who wants to make a quick buck out of NZ's current tourism boom. If they want to enable their customers to get "closer to nature" there is private land outside the National Park, where there is just as much 'nature'. The developers are cynically choosing to apply to build in the National Park because they can then market it as "in the heart of the majestic Fiordland National Park"

If this goes ahead the same argument can then be applied for all the National Parks where tourists 'want to get closer to nature' - the Routeburn, Matukituki Valley, Abel Tasman and so on. This would set a precedent and must be resisted - to see why just go to an American National Park

G. Your Signature

Date 12th July 2018

Please complete this form and send to

25

24

Lisa Wheeler

From: [REDACTED]
Sent: Thursday, 12 July 2018 10:56 p.m.
To: DNSubmissions
Subject: Submission for Path NZ proposal in fiordland

Attention: Lisa Wheeler, Permissions Advisor

My submission relates to the entire proposal, I want the application to be declined, because the proposal:

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

This is not what our national parks were set up for.

Sincerely,

[REDACTED]

25



This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

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

You may also mail your submission to:

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

Attention: Lisa Wheeler
Permissions Advisor

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is **5.00 pm, Friday 20 July 2018.**

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) / Oppose this Application.

E. Hearing Request

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

F. Submission

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

All of it

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

I do not wish the facility do be built because

- As a tax payer and SDC rate payer I want access to our public land to remain for all people and not just a few.
- I don't want Fiordland and our other parks to become elitist and offering high end accommodation begins this process.
- I don't want the precedent set.
- I want robin's and tomtits to flourish . They seem to like that area and I worry that construction and the noise of guests will frighten them.

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

The outcome I would like is that the company will remember that the reason people travel to NZ is the very thing they wish to destroy - The wilderness, the peace and our strong belief in conservation and protecting our future.

Thank you for allowing the public to help make this decision.

G. Your Signature

[Redacted signature area]

25

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Date

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

26



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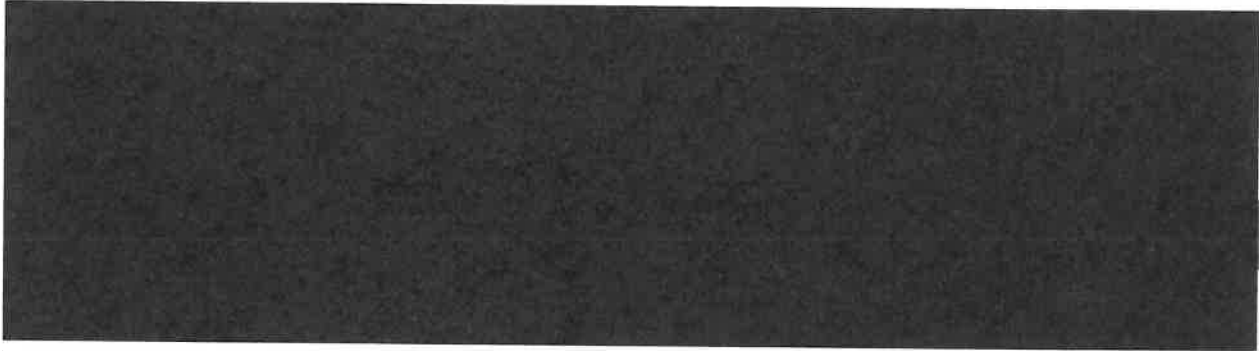
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64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

FS

27

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

THIS IS OUTRAGEOUS.
LAND IN NATIONAL PARKS SHOULD NOT BE
SOLD OFF TO PRIVATE INTERESTS.
THEY CAN BUY PRIVATE LAND 20 MINUTES
DOWN THE ROAD.

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

REJECT TOTALLY THIS APPLICATION.

G. Your Signature



Date

13/7/18

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

(25)

(27)



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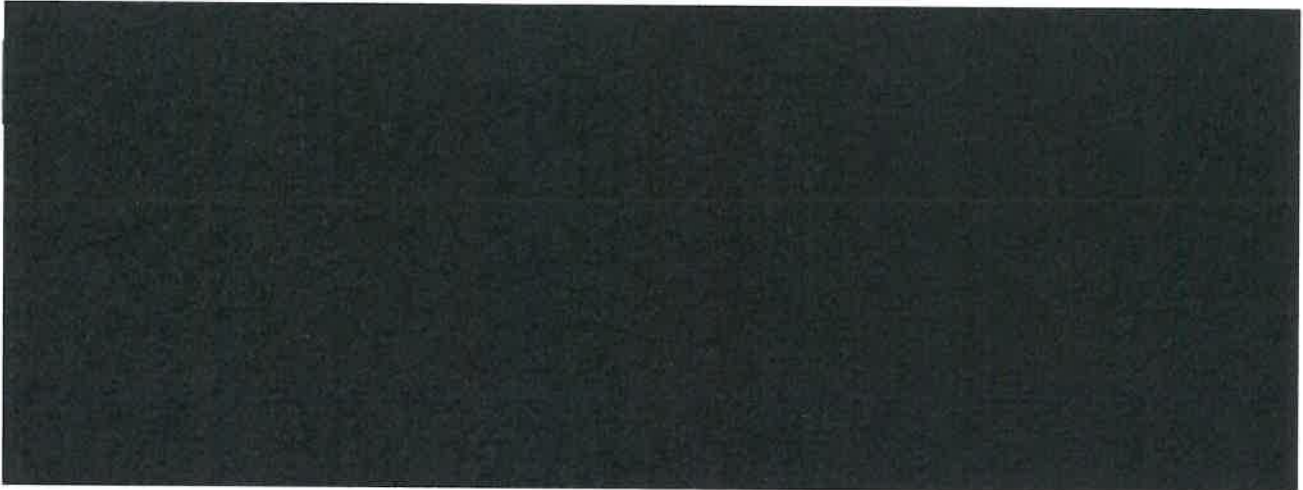
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

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

F. Submission

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

85

28

My submission relates to the entire proposal,

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

The proposal:

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

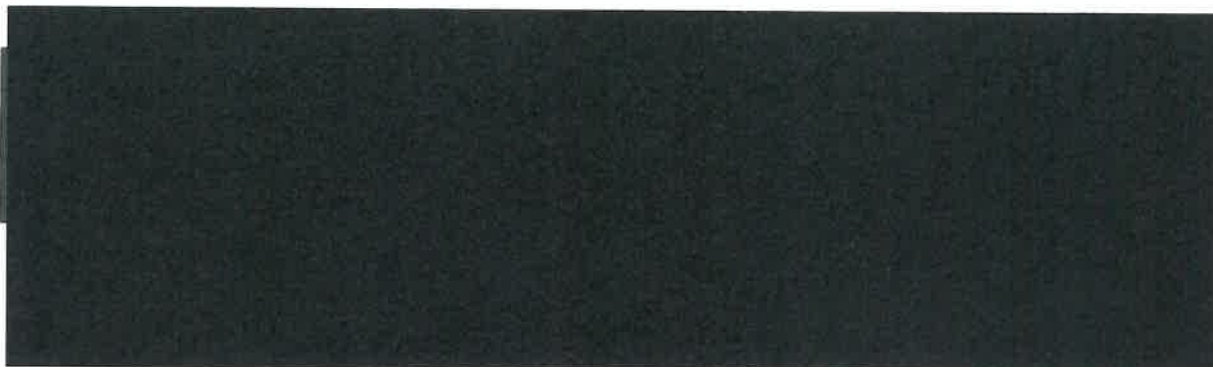
What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I want the whole application to be declined.

85

28

G. Your Signature



13/07/2018
Date

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

28

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B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

PS

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

The proposed development is an utter travesty. It is directly contrary to the stated purpose of National Parks (maintenance in their natural state with a public right of access). Use and occupation of National Parks for monetary gain by private companies is distasteful, contrary to New Zealand values, and makes access and enjoyment more difficult for ordinary New Zealanders.

It also directly contradicts policies for accommodation in section 9 of the [General Policy for National Parks](#), (GPNP) particularly 9(d), which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use. It is also contrary to the Fiordland National Park Management Plan, specifically the objectives for Milford Road, (section 5.3.9.2 – 13 page 176)

It is of further note that the Eglinton Valley supports the last remaining mainland population of southern lesser short-tailed bats (*Mystacina tuberculata tuberculata*) (see O'Donnell et al. 2017, Conservation status of New Zealand bats). Any activities that may cause disruption to this species; to the mature trees in which they roost; or to their prey species should be strongly discouraged. Building a luxury lodge in the Eglinton Valley is exactly the kind of activity that is likely to disrupt the habitat of *M. t. tuberculata* and other threatened species.

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

I wish the application to be declined in its entirety.

G. Your Signature



13/07/18 _____
Date

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

PS)

29

TO:

The Director General

c/o Department of Conservation

PO Box 5244

Moray Place

Dunedin

Attention :

Lisa Wheeler, Permissions Advisor

Re: publically Notified Application for Leases, License, Permits or Easements

Permission Application Number 64177-ACC

By Path NZ Limited

Submission of Comment from

I **oppose** the application by Path NZ Ltd to build accommodation facilities and operate associated services in the Eglinton Valley, Fiordland National Park.

The reason for my views are that I believe NZ's National Parks' primary purpose should not be commercial wealth generation for private individual benefit but the preservation and conservation of nature, enhancing biodiversity, while allowing for the enjoyment and appreciation of nature by visitors. Visitors should be managed so that they cause no or very low impact on the natural values, in keeping with the main purpose of our parks. This is the principle upheld in our National Parks Act, which is binding to the Crown. I refer the reader to this excerpt from the National Parks Act 1980 (includes my own underlining of especially relevant wording): "...

Part 1

National parks

Principles to be applied in national parks

4Parks to be maintained in natural state, and public to have right of entry

(1)

It is hereby declared that the provisions of this Act shall have effect for the purpose of preserving in perpetuity as national parks, for their intrinsic worth and for the benefit, use, and enjoyment of the public, areas of New Zealand that contain scenery of such



distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.

(2)

It is hereby further declared that, having regard to the general purposes specified in subsection (1), national parks shall be so administered and maintained under the provisions of this Act that—

(a)

they shall be preserved as far as possible in their natural state:

(b)

except where the Authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated:

(c)

sites and objects of archaeological and historical interest shall as far as possible be preserved:

(d)

their value as soil, water, and forest conservation areas shall be maintained:

(e)

subject to the provisions of this Act and to the imposition of such conditions and restrictions as may be necessary for the preservation of the native plants and animals or for the welfare in general of the parks, the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features.

Compare: 1952 No 54 s 3; 1972 No 87 s 2

5 Indigenous plants and animals to be preserved

(1)

No person shall, without the prior written consent of the Minister, cut, destroy, or take, or purport to authorise any person to cut, destroy, or take, any plant or part of a plant that is indigenous to New Zealand and growing in a national park.

(2)

No person shall, without the prior written consent of the Minister, disturb, trap, take, hunt, or kill, or purport to authorise any person to disturb, trap, take, hunt, or kill any animal that is indigenous to New Zealand and found within a national park. ”

I do not see the establishment of a luxury hotel or any other type of hotel in the Eglinton Valley as a low impact activity. The preparation of a building site would necessitate destruction of native flora and fauna currently occupying the site, which obviously conflicts with the National Parks Act quoted above. Additionally, there would be ongoing impacts; to the visual amenity of the area, which conflicts with the National Parks Act's provision for preserving the parks in their natural state, as quoted above. The provision of electricity, management of waste water and sewage and allowing for the transport of guests to and from the site would all cause ongoing disturbance. The area in and around the accommodation would likely be managed as exclusive use for paying guests only, which also goes against the principle of free access by the public to the park. I don't think any of this can be justified.

While there is precedent in other accommodation operations located in national parks (for example the Hermitage Hotel in Mt Cook National Park), these are mainly not recent developments. The Hermitage was established long ago, before the Mt Cook National Park was established, and thus the rules we now have to protect our parks did not exist. Further, park or no park, what may have been ethically acceptable in 1884 is not necessarily the best thing to emulate in 2018. The world in 2018 is much shorter on wilderness than it was in 1884, and there are now many alternative hotels available. With modern transport options we now have the ability to visit what were once remote sites in the national parks as day trips, from convenient accommodation sited outside the park. When The Hermitage opened, it required a three-day, horse-drawn coach journey from Timaru to access. Now, in contrast, the central Eglinton Valley is only a 45 minute drive from Te Anau township.

The applicant may claim there is demand for such an accommodation facility but supply and pushy marketing does tend to create demand, whether there was originally any such demand or not. Our planet now has a burgeoning human population and if even a tiny fraction of our fellow inhabitants could be convinced to visit such a hotel, the rooms would be filled and your applicant would be vindicated in any claim of a "demand". Just because such a business could be viable, some visitors might enjoy it and one company could make a profit does not mean we should go ahead and allow it however.

Our parks are a shared public facility and we the public do not deserve to have our clean, uncluttered parks filled with the messy human paraphernalia of built-up commercial developments. If this application was to be granted, I imagine it would set a precedent for a rush of similar applications, all hoping for similar opportunity. How could the Department of Conservation then fairly refuse these if Path NZ Ltd's application had been accepted? A proliferation of human developments in our parks is completely undesirable in my view. Visitor accommodation, even roadside campgrounds, should be kept outside of the parks as far as possible. In this case there is much adjacent private land offering alternative sites to Fiordland National Park land, within a 20 minute drive of the site concerned. It is in no way justifiable to offer the use of Fiordland National Park land for additional hotel beds. This application for development must be refused.

In the face of rising pressures from tourism and exponential world human population increase, it is more important than ever that we uphold our protective rules and don't allow exceptions. That way we ensure our parks remain beautiful and un-spoilt by human development. Generations of future New Zealanders, hopefully hundreds of years into the future, will be thankful for the opportunity to enjoy our heritage - national parks in their natural state.

Thank you for your time



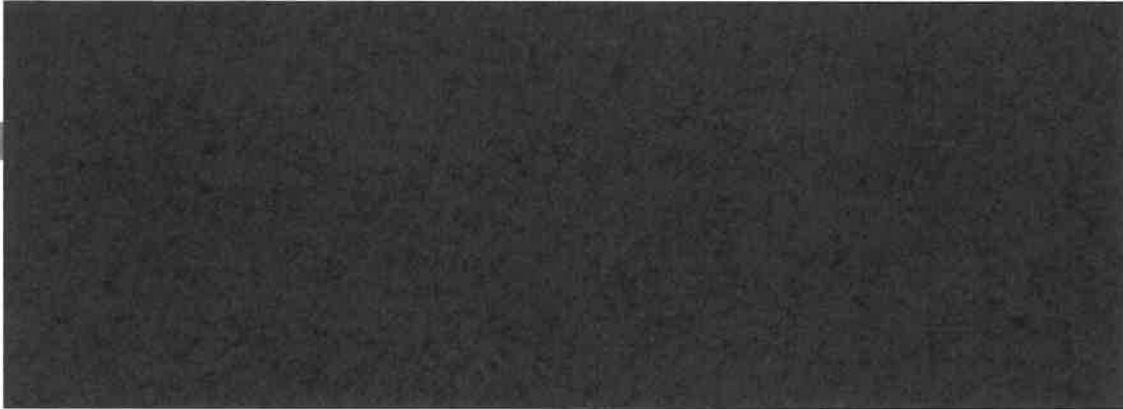
Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

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

F. Submission

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

All of the application.

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

Exclusive use is inconsistent with our national parks act. This goes against the spirit of keeping all our parks open for public to enjoy and appropriates public resources for private benefit. In an area with few human structures this project will impinge on the Eglinton Valley's overall sense of naturalness. It will also pose a risk of biosecurity breach with machinery coming in and out of the area.

18

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It conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry

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

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

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

I seek the whole application is declined.

G. Your Signature



_____ 13.07.08 _____
Date

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



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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

SE

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

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

The application conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry.

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

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

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

The application should be rejected in its entirety because I believe that publicly owned national park lands should not be leased out for exclusive private use.

C Your Signature

A large black rectangular redaction box covers the signature area.

13th July 2018
Date

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

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

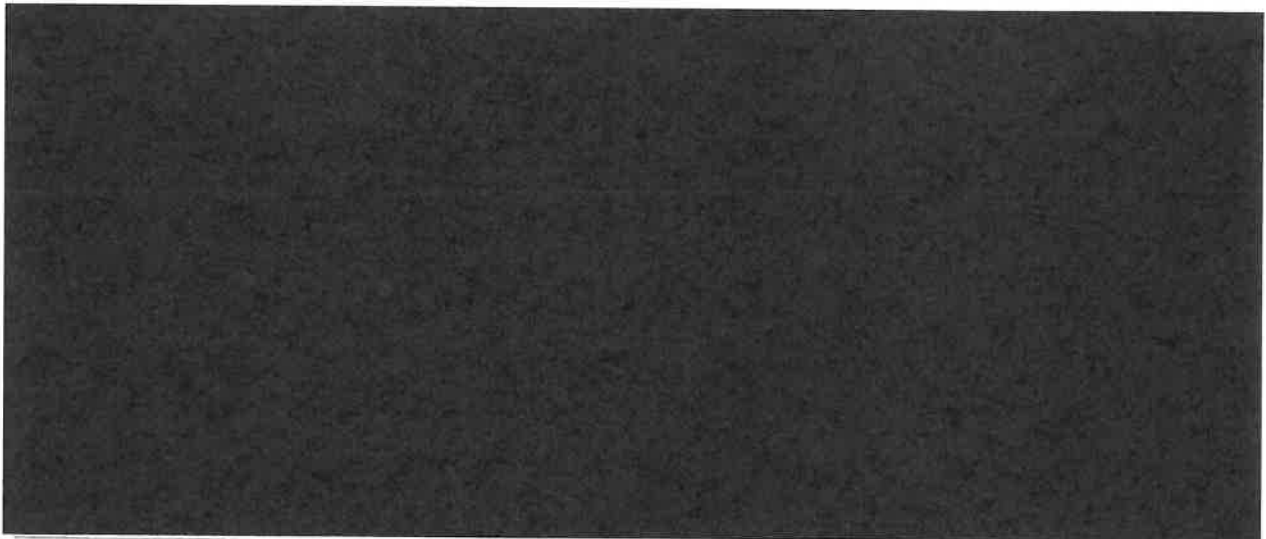
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of ~~Support~~ Opposition

I Oppose this Application.

E. Hearing Request

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

F. Submission

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

- That this is for a private commercial business on public conservation land, and the public are excluded;
- The arguments that this will provide an "increased appreciation of the environment and value of conservation" are not sound;
- The argument that it will relieve congestion by spreading the load on the Milford Road;
- The argument that it will employ local people;
- The argument that it will give people an increased appreciation of the environment and they will learn the value of conservation;
- The argument that there is a need to site this lodge on this publicly protected land and that there are no other possible sites;
- The arguments that there are other buildings and car parks in the area.

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

1. There should be no private commercial buildings in national parks of such a fragile nature as Fiordland. The park and Te Anau both have hurdles in coping with rapid growth in tourist, worker numbers and house building. The natural environment, including Lake Te Anau, are under threat. Surely it would be reasonable to adopt a cautionary model and state that peak development has been reached in the park and efforts should not go into minimising the impact of humans on the natural environment.
2. The developer argues throughout the submission that there are many developments along the front of the Milford Road. Many of the development are from an earlier era long before New Zealand was serious about having a conservation estate. Later developments, like DOC campsites, are all public owned and accessible by the public and help contain random camping that could spoil the area.
3. The location of this proposed development is not far from a gateway town – Te Anau – with the established infrastructure required for an accommodation facility. Any type of settlement is an imposition on the environment so, as a country working on conservation of our land and species, we should not add any more settlements than necessary. Indeed, we should strive hard not to. Development should be concentrated outside the park, not inside.

New Zealand must learn to differentiate between what is good for a business, that is earning dollars, and what is good for the land and its future. In this case the decision on whether this business should go ahead should favour the land. It has already been designated for conservation, why now allow others to nibble at it. DOC must hold the line. Less is best.

The benefit to having a gateway town, rather than development in the park, should be

considered and work has been done on this. Some analysis is mentioned here:

"Gateway communities play an important role in the protection and management of natural areas in several ways, through providing services for visitors and, therefore, keeping commercial development and visitor infrastructure outside park boundaries (although some gateway communities are located within protected areas), and through providing economic and political support for the protection and management of park and protected area resources (e.g. communities with financial ties to a resource have an inherent interest in protecting the resource, because the quality of the park is the primary tourism product)."

(Link: <https://www.doc.govt.nz/Documents/science-and-technical/sfc309entire.pdf>)

4. I see nothing convincing in this application as a reason to site a lodge in an untouched setting like this in the national park. There are alternatives nearby – in fact there are magnificent vistas and bush coverage around Te Anau – where guests can savour a feeling of serenity.
5. The proposal appears to be for accommodation and meals. The guests will only be there in the evenings therefore this setting is not essential. Indeed, the developer says guests will be doing the short walks in the Milford Road area and will come to the lodge later in the day.
6. Too much is being made out of the lodge bringing some relief to the overloading of the Milford Road. With 40 guests at the lodge, and still a drive from Milford Sound, it would make little impact on reducing traffic. The solution for traffic overload is something much more radical like stopping private vehicles going to Milford and taking everyone by bus. This is a conservation approach – reducing traffic nuisance, crashes, vehicle noise, and enhances the visitor experience. This development is adding to traffic by removing the Te Anau to Milford bus option.
7. The developer claims they will add jobs for locals. There are no locals in this location, which means they would have to drive from Te Anau. This would be too costly for local workers on the minimum wages that tourist facilities pay. The likelihood is the lodge will hire overseas backpackers. The siting of the lodge encourages a reliance on foreign workers. This is clearly evidenced by the provision of onsite staff accommodation demonstrating the intent is to hire people from outside the area who do not have homes and a family to go to each night.
8. I owned accommodation businesses in Kalkoura for 10 years. The overwhelming attraction of New Zealand to most tourists is our landscapes. Sit down and have a chat to them. They will talk about all the buildings throughout Europe and Britain on the lowlands and the hills. They will talk about driving for miles in NZ without seeing a house. This is the attraction of New Zealand. Let's not ruin it.

Others have described it more eloquently: 'A cherished corner of the world where mountains and valleys compete with each other for room, where scale is almost beyond comprehension, rainfall is measured in metres and scenery encompasses the broadest width of emotions'.

(Link: <https://www.fiordland.org.nz/about-fiordland/fiordland-national-park>)

The developer says these buildings will not be visible from the Milford Road, but there will be a road developed and signage, and there will be "creep" from future developments so eventually buildings will be in the open. By allowing this and future developments the visitor experience is being compromised. They will be visible from the air.

9. It is disappointing that the developers see no difference between DOC huts and this proposed lodge. The claim they are the same because fees are paid to stay in the huts. They should recall that for generations tramping huts were free and the public helped maintain them – indeed some were built by tramping clubs. It was the neoliberal governments that brought in charging and put a business model into our conservation estate. This might change but I do not see this planned lodge becoming a free public facility at any time. And let's remember that DOC huts require people to walk in. That's part of the special experience and indeed gives everyone "an increased experience of the environment" which their lodge will not do. This development cannot be compared with a tramping hut.
10. I object to the public being locked out of any part of the national park because a private owner wants to do business there. The developer states they want exclusive use and suggest the limit on freedom camping should be extended out to include their access way.
11. There seems to be a lack of consistency with DOC policy in other areas, in the fact that DOC is actually considering this proposal. In the Abel Tasman National Park long time privately owned baches had to be removed once the owner had died. Why then would DOC allow a private owner to build on another national park.
12. It is disappointing that the developer believes their lodge will help people learn the "value of conservation". That's ironic when they will be disturbing the publicly protected conservation estate. This private developer wants to cut down trees, clear land for a car park and discharge brown and grey water into the land. They present pictures of public car parks to show that it is done elsewhere, for example the Lake Marian car park. They propose a private facility, a private car park for exclusive use, not for the public.
13. One of my favourite drives in NZ is the Milford Road. I have been there many times outside the frantic tourist season. Please don't allow any more buildings. If you do this will be the beginning of the end. By granting the application DOC will set a precedent and will not be able to turn down future applications. In years to come they will be dotted along that glorious highway. A tragedy.

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

I do not want any part of the application amended. I want the application to be turned down. The business owners should go away and re-evaluate what is so beautiful about this country. For their information it is the package – of mountains and valleys, trees and shrubs, without the intrusion of humans and all their paraphernalia like buildings and roads. If we want to live up to Pure NZ branding, then let's not do this.

G. Your Signature



Date

13/7/2018

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



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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

The entire proposal.

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

I oppose the entire proposal for the following reasons:

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

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

I want the entire proposal to be declined.

G. Your Signature



13 July 2018
Date

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

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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I Oppose this Application.

E. Hearing Request

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

F. Submission

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

The permission itself

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

General principle: let's keep National Parks what they [still] are and are meant to be -- a public resource, NOT available for private development (!)

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

Decline the proposal, i.e., do not grant permission in any shape or form.

G. Your Signature



13 Jul. 2018 _____
Date

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

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Lisa Wheeler

From: [REDACTED]
Sent: Friday, 13 July 2018 6:00 p.m.
To: DNSubmissions
Subject: Permission Application Number and Name of Applicant 64177-ACC - Path New Zealand Limited

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

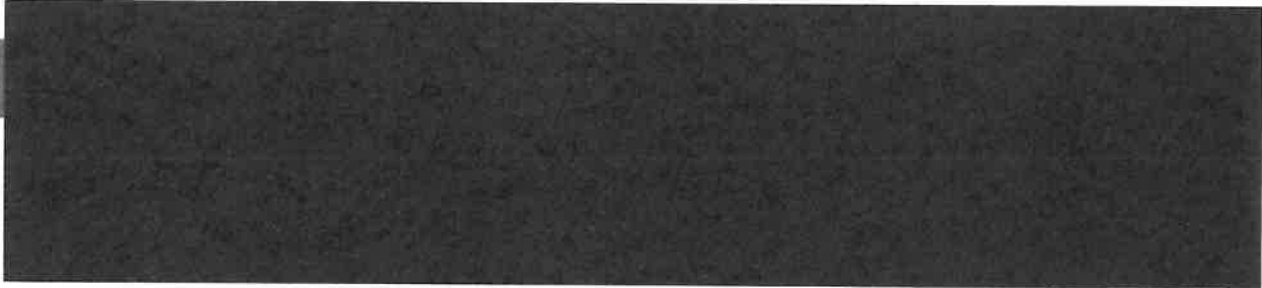
B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-

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

New Zealand Professional Fishing Guides Association



D. Statement of Support/Opposition

We Oppose this Application.

E. Hearing Request

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

F. Submission

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

1. Historical usage
2. Location of site and status of land
3. Privatisation of Conservation Estate

Our submission is that you do not grant the submission due to the following:

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The Eglinton valley has long been of great value to anglers with the relative ease of access to an excellent fishery that offers the feeling of remoteness in a largely untouched and unspoilt environment. New Zealand Professional Fishing Guides Association (NZPFGA) members have been using this river since our inception in 1977 (and likely before) to entertain guests looking for the solitude and excellent fishing this unique valley offers.

The NZPFGA membership is 161 strong and is based in all regions of New Zealand. The majority of the Southland and Otago regional members utilize this fishery during the course of the fishing season from 1st Nov - 31st May each year as a NZ highlight for their clients. Many members from other regions also choose to use the Eglinton river while on extended trips with clients. It is a very important and well used fishery for members of the NZPFGA.

Section 5.3.9.2 Milford Road of the Fiordland National Park Management (FNPMP) states "proposals must still consider effects on the natural environment and existing recreational opportunities." The proposal has not considered the large impact that it will have on anglers both guided and unguided.

Section 5.8 of the FNPMP states (under Objectives) "2. Consider recreational facility development proposals within Fiordland National Park where they are consistent with national park values, including the visitor group and visitor setting in which the facility is to be located, and do not compromise the recreational experiences associated with neighbouring areas through the displacement of existing user groups."

The NZPFGA as concession holders would be adversely affected and seriously compromised by granting the application as it will effectively displace us as historical users.

2. Location of site and status of land

The experiential component of anglers will be severely eroded by the erecting of the buildings, fuel tanks, car parks, nature trail and access road that will be in both sight and noise reach of anglers.

Section 5.3.9 Frontcountry Visitor Setting of the FNPMP states "Travellers' accommodation facilities may also be appropriate in these visitor settings although the preference would generally be to have new facilities located at already modified sites." The applicant's preferred site is completely unmodified and should remain this way.

The applicant suggests that the public would be challenged to access this area easily. Many anglers including guides access the Eglinton river from the Dore Pass car park and fish up to the point where the river returns to parallel the road. The proposed site is right in the middle of this section. Guided anglers often use existing trap lines and deer trails which make for relatively easy access to points on the river and/or to exfiltrate from the river. This will create the serious potential of conflict with applicant's guests making unwelcome intrusions into the otherwise solitary activity of fly fishing. Of high value for most freshwater anglers is the ability to remove oneself from the hustle and bustle of other humans and their doings to be immersed in nature both physically and psychologically.

The upper reaches of the Eglinton river have suffered from flooding over the years, resulting in a loss of freshwater fisheries habitat. Trout population density declines rapidly 1 km above the Murcott burn. This indicates that the area around the Murcott burn is vital to supporting a fishery in the upper river and continuing to provide the type of experience that anglers from all around the globe come to enjoy.

As per the Conservation Act 1987 Department of Conservation (DoC) is responsible for protecting freshwater fisheries habitat. Granting the submission is highly likely to have adverse effects on a very important part of the river and therefore likely to cause harm to the freshwater fisheries in the area.

Guided fishing is an extraordinarily non invasive usage of the Conservation Estate where guides and their

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complex is not only permanent but will alter and damage the landscape forever and do the same to the guided anglers experience in this valley.

3. Privatisation of Conservation Estate

The applicant is essentially seeking permission to operate a series of private accommodations at the proposed site on public land for commercial gain and private profit to the detriment of all other users and especially those of historical usage such as NZPFGA membership.

This is contradictory to the section 6.12 Private Huts of the FNPMP which states " Private huts are considered inappropriate in national parks as they appropriate public resources for exclusive private benefit and are not consistent with the National Parks Act 1980. Private huts can have an adverse effect on the environment and other users' enjoyment of the area. The presence of inappropriate buildings in a natural landscape can lessen its natural character, as can the effects of inappropriate rubbish and sewage disposal and change to vegetation and landscape. There is also a general reluctance by the public to visit areas occupied by private huts. National park land is public land."

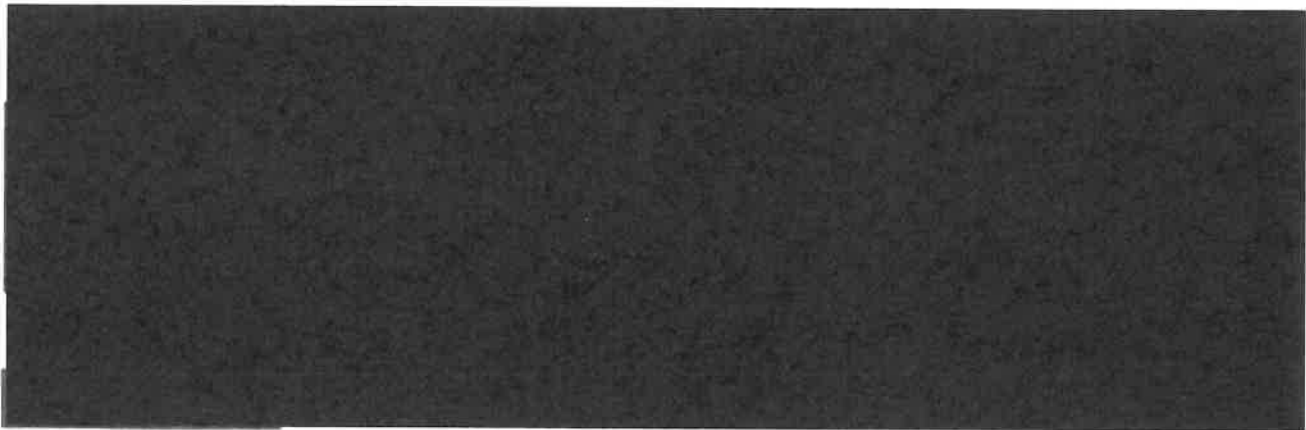
In fact the FNPMP 6.12 Private Huts states "Objective 1. To gradually remove inappropriate private huts within Fiordland National Park. Implementation 1. No new private huts should be allowed to be constructed within the Fiordland National Park".

Guided angling does not privatise any part of the Conservation estate yet makes a significant economic contribution to the New Zealand economy. If successful this submission will have considerable impact on the dollar spend of visiting anglers in the Southland/Fiordland region and will be to the detriment of the current concession holders (NZPFGA membership) and the region as a whole.

The applicants are asking for exclusive possession. This is in contradiction to FNPMP which states in Section 5.3.9 "The provision of facilities in the frontcountry encourages accessibility by all".

There are provisions in the Conservation Act 1987 that direct DoC to provide existing concessionaires due consideration before granting any concession. We ask that as concessionaires that the NZPFGA are given due consideration and the outcome be that the applicants submission be denied.

G. Your Signature



Date

11/07/2018

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



New Zealand Professional Fishing Guides Association
Ph 0272163787



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

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

The building of private facilities on protected National Park land for private gain.

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

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I vehemently oppose this application. I shouldn't even have to be writing this submission in opposition.

This is a National Park and is not to be used as a free-for-all development area. It is supposed to remain wild and undeveloped. The very spirit of a National Park is the antithesis of a proposal such as this.

There are huge amounts of land closer to Te Anau that can be utilised for this purpose without putting at risk our biggest and most rugged National Park. Te Anau is the gateway to Fiordland and should be marketed as such. Te Anau is only just down the road and the travel distance will not effect the operation of the proposed activities this application is attempting to facilitate.

If this proposal was to go ahead, what is next? A cafe at the Divide? Shopping centres at Doubtful Sound? A heliport and airstrip on the Eglington Flats? Our wild spaces MUST remain wild spaces. Any erosion of that soul these areas possess, especially for private gain, cannot be allowed.

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

That this application does not go a step beyond its hearing. And a precedent is set during the hearing that disallows any other applications to even surface.

G. Your Signature

[Redacted signature area]

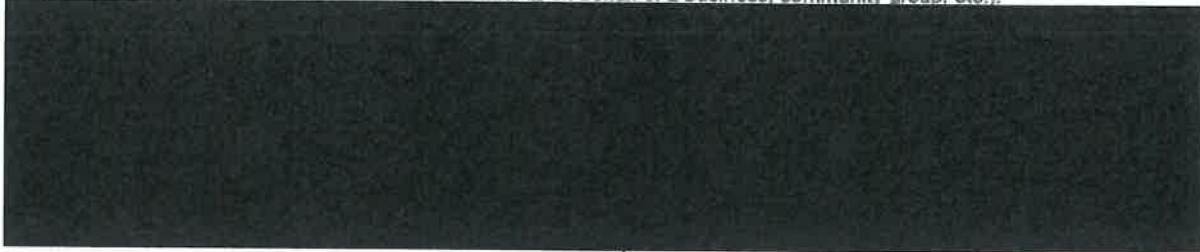
13.07.18

Date

(58)

(37)

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



D. Statement of ~~Support~~ Opposition

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

E. Hearing Request

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


F. Submission

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

USE OF NATIONAL PARK LAND.

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

THIS IS A "NATIONAL PARK". IT IS A "NO
GO" AREA FOR DEVELOPMENTS FOR COMMERCIAL
BENEFIT.

 SIMPLE IS NOT IT.
WHY IS TAXPAYERS MONEY BEING BURNED
WASTED IN THIS PROCESS.

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

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G. Your Signature



13/7/18.
Date

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

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This form is to be used to provide submissions concerning publicly notified applications for leases,
licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

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

You may also mail your submission to:

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

Attention: Lisa Wheeler
Permissions Advisor

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is
5.00 pm, Friday 20 July 2018.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.



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

B4177-ACC – Path Now Zealando Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

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

1. The application is not suitable for resource consent because it is not in the public interest and it is not in the public interest to grant resource consent for the proposed development. The proposed development is not in the public interest because it is not in the public interest to grant resource consent for the proposed development. The proposed development is not in the public interest because it is not in the public interest to grant resource consent for the proposed development.

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

G. Your Signature

[Redacted signature area]

15/07/18

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



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

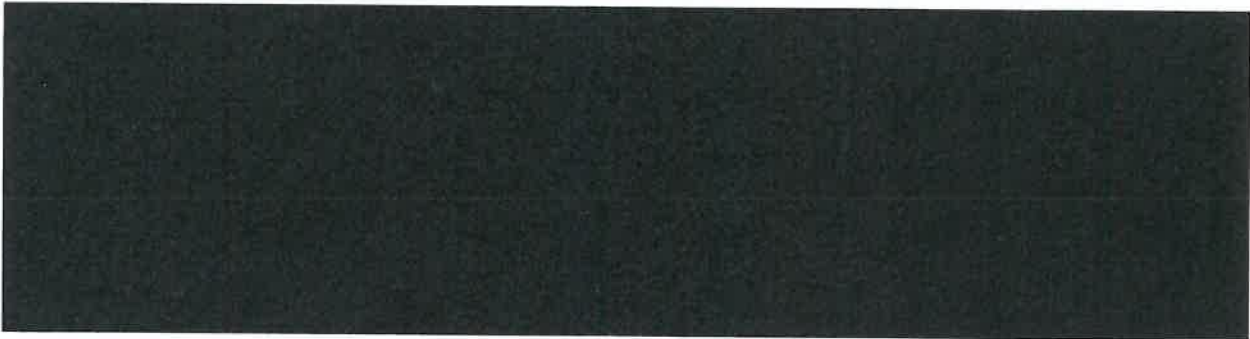
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

My submission relates to the entire proposal.

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

I want the application to be declined, as the proposal:

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

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

New Zealand has a long history of keeping our most spectacular landscapes open for all to enjoy – right from the creation of Tongariro National Park, the first national park in the world gifted by indigenous people.

This proposal goes against the spirit of keeping our parks open for all the public to enjoy, as well as breaching policies to that effect.

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

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

I am submitting against the proposal to defend our national parks – places set aside for their intrinsic worth. This isn't the first time companies have tried to erode that basic tenet, from inappropriate helicopter landings to hydro schemes. It won't be the last time either; we need to ensure that publicly owned national park lands are not leased out for exclusive private use.

G. Your Signature



13 July 2018 _____

Date

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

40

Lisa Wheeler

From: [REDACTED]
Sent: Saturday, 14 July 2018 8:58 a.m.
To: DNSubmissions
Subject: Submission against proposal Path New Zealand Accommodation Business in Fiordland National Park

Hello

I would like the application for a private business application to exploit Fiordland National Park for profit based on the following reasons:

I believe rich people have enough advantages and special treatment in society. Giving them special access to NZ's National Parks should not be a priority - rather increasing access for the most vulnerable, the least wealthy and particularly disenfranchised Maaori should be a priority instead as they are the ones who would benefit the most. It is elitist and fundamentally put profit before our people and our native species.

It is in direct conflict with keeping the environment in an untouched state. Bulldozing the area, building accommodation facilities is not the role of a National Park. Let alone having someone profit from destroying areas of sanctuary for our native species.

Also for the reasons illustrated below:

- directly contradicts policies for accommodation in section 9 of the [General Policy for National Parks \(GPNP\)](#) especially 9(d) which states that applicants should place accommodation outside of the park, or share existing facilities; but including policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use. Is contrary to the Fiordland National Park Management Plan; specifically the objectives for Milford Road, (section 5.3.9.2 – 13 page 176)

I hope you make the right decision and decline this application.

Best Regards

[REDACTED]

(46)

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This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

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

You may also mail your submission to:

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

Attention: Lisa Wheeler
Permissions Advisor

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is **5.00 pm, Friday 20 July 2018.**

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy-Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

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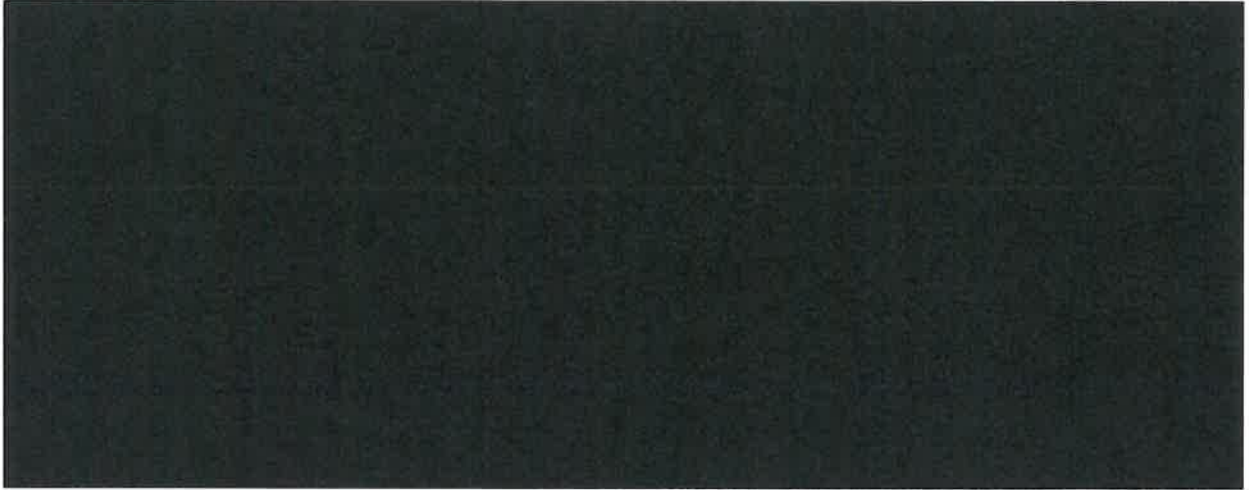
A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Support this Application.

E. Hearing Request

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

F. Submission

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

The right to operate a business in the National Park

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

I unreservedly support the Path New Zealand proposal to build a lodge within the Fiordland National Park.

The proposed lodge will be a welcome alternative to travellers, who wish to choose a wilderness experience, along with a level of stylish comfort, not presently available in alpine huts.

The project will be influential, in changing the usual heavy flow of traffic racing from Queenstown to Milford for lunch cruises, then returning to Queenstown.

I consider this to be an inspirational concept, that should be encouraged.

It will enhance the National Park not detract from it. It will also greatly enhance the experience of those who avail themselves

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

G. Your Signature

[Redacted signature area]

(SW)

(42)



Date _____

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Attention: Lisa Wheeler, Permissions Advisor

(54)

(42)



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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) Support this Application.

E. Hearing Request

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

F. Submission

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

44

43

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

I fully support the proposal, to establish up-market accommodation and wilderness experiences in Fiordland National Park by Path New Zealand.

There is existing accommodation in the Park, administered by DOC, Federated Mountain Clubs, and other private businesses – this concept, is nothing new.

Park accommodation is currently over-booked, and there is a pressing need for businesses to establish more opportunities for the community to experience the wilderness supported with up-market accommodation and food.

Everything that can be done to enhance the experience for visitors to the region, should be encouraged for the benefit of Fiordland and New Zealand.



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

G. Your Signature

A handwritten signature in black ink, enclosed within a hand-drawn circle.

The number '43' handwritten in black ink, enclosed within a hand-drawn circle.



Date

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



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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

*My submission relates to the
entire proposal*



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

As a Citizen and tax payer of New Zealand I object to public land being used for Private Profit. I especially object to National Parks being used for Private Profit. allowing concessions needs to be carefully controlled and allowing the building of a lodge contradicts policies for accommodation in Section 9 of the General Policies for National Parks.

The idea of this lodge makes me very very angry! So we sell our high country farms to millionaires and give our National Parks for a lodge for the wealthy. Makes me sick!! They can buy land outside of the Park - like anyone else has to.

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

~~That~~ I want this application turned down. There are no compromises that would be acceptable to me. No to the Lodge No to exclusive use No the application.

G. Your Signature



14 July 2018.
Date

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

(46)

Lisa Wheeler

From: [REDACTED]
Sent: Saturday, 14 July 2018 7:13 p.m.
To: DNSubmissions
Subject: Development in Fiordland National Park.

In no way should this development be allowed to take place within our national park. Stop any ideas of this.

Regards [REDACTED]

(45)

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Lisa Wheeler

From: [REDACTED]
Sent: Saturday, 14 July 2018 8:17 p.m.
To: DNSubmissions
Subject: Decline request for lodge inside national park

Hello,

My submission relates to the entire proposal, I want the application to be declined, and the proposal:

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

We do not need a private enterprise on public land. Do not allow this proposal to go through.

Thank you,

[REDACTED]

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Do not include page one.**

A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

The entire proposal

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



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

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

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

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

G. Your Signature



15/7/18
Date

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

(FW)

(47)

Lisa Wheeler

From: [REDACTED]
Sent: Sunday, 15 July 2018 12:47 p.m.
To: DNSubmissions
Subject: Please do not allow.

I am writing to oppose the proposed development in Eglinton Valley. For many reasons, including the following:

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

We already have limited wilderness areas and this is completely unnecessary.

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Notes to Submitter:

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

Attention: Lisa Wheeler
Permissions Advisor

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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

I (circle one) Oppose this Application.

E. Hearing Request

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

F. Submission

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

The entire proposal.

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

I wish to see this application declined as it conflicts with the purpose of maintaining national parks in their natural state and being places where the public have the right of entry.

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

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

Encroaching on conservation, wilderness land inside a National Park for private commercial gain sets a dangerous precedent. The Department of Conservation needs to protect our wilderness for everyone and not allow a small number who can afford it lodge accommodation and an even smaller number to make money from our conservation land.

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

I want to see this application denied in its entirety.

G. Your Signature

P3j

49



15.6.18
Date

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

RJ

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A. Permission Application Number and Name of Applicant

64177-ACC – Path New Zealand Limited

B. Name of Proposed Activity and Location(s)

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

C. Submitter Information-



D. Statement of Support/Opposition

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

E. Hearing Request

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

F. Submission

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

All.

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

1. The proposed development contradicts policies for accommodation in section 9 of the General Policy for National Parks. This policy states that applicants should place accommodation outside of the park or share existing facilities (9d). An example of the planning and administrative complications that arise from private accommodation in national parks is the current issue of the Canterbury Mountaineering Club Wyn Irwin hut in Aoraki Mt Cook National Park. Surely the Department has learnt that it is best to avoid future hassles and potential conflict from private accommodation within national parks?
2. It is exclusive, private accommodation within a national park. It contradicts policy 9(e) which provides that any new facilities are not for exclusive use and provide for public use.
3. It is contrary to the Fiordland National Park Management Plan; specifically, the objectives for Milford Road, (section 5.3.9.2 – 13 page 176).
4. This building complex reduces the naturalness of the Eglinton valley for other users. Even if it cannot be seen from the road, the signage and cars in the carpark all point to the presence of the lodge and diminish the perceived wildness of the landscape.
5. We are not convinced that there is no alternative to this site. There are other ways to stay in the Eglinton valley and experience the natural landscape. Has the applicant explored alternative private land sites on the Park boundary with similar landscapes and sense of naturalness, for example, the Chartres family station at Te Anau Downs?
6. We believe it is best if private buildings in the National Park are clustered together, for example at Knobs Flat. This reduces visual impact, provides a "village-like" complex, and allows for co-operative provision of power systems, sewerage disposal, fire-fighting infra-structure, and emergency planning. A compact cluster reduces the combined environmental and visual footprint.
7. We do not believe sufficient evidence has been provided to show that sewerage disposal can be achieved with minimal environmental impact. In fact, the solution put forward seems to require a dispensation from the Council's standard for secondary treatment. The additional information suggests that sub-surface dropper irrigation systems may be deployed. There is no assessment on the impact of the waste water applied to either 800m² of "tussock" or 200m of beech forest (see applicants Additional Information). The applicant does not detail sufficient evidence to assure submitters that the system will work in winter at this site. The examples of working dripper irrigation systems are all at warmer, lower altitude sites.
8. The vegetation assessment was done at the least optimal time of the year (July 2017) for a vegetation survey. Despite a full year between the assessment and the concession application being notified no update has been provided.



9. There is no assessment, thresholds nor monitoring plan for light-pollution; rather, just an offer to keep lighting "to a minimum".
10. There is nothing substantial, innovative nor measurable about the proffered biodiversity offsets for the impacts of the development. In fact, it is a mystery why such a project would not present a compelling concrete plan for a conservation gain from the development to win approval from the public. We expected at least an offer of a percentage of the accommodation fee towards the pest control in the Eglinton valley as part of the marketing of the experience. That staff may "assist" in maintaining pest traps and bait lines" in conjunction with DOC is an extraordinarily weak commitment from an applicant who wishes to benefit from the naturalness of the site, and to showcase nature. That accommodation and nature interpretation at this site will "hopefully lead to a longer term-commitment to biodiversity conservation by guests" is an unmeasurable outcome that can be achieved through other encounters with nature anywhere in Fiordland National Park.
11. The applicant presents no outline of a programme to systematically survey and remove weeds. Weeds can degrade the existing vegetation and reduce the experience of "natural New Zealand". The biggest impact of soil disturbance from construction and 80m² of waste water being applied to "tussock" is the introduction and spread of weeds. The worst weeds for the mossy herbfield will be the spread of exotic grasses that can increase the soil moisture and lead to taller vegetation that may shade out the mosses, herbs and lichens. There is no evidence of an intent to remove the Russell lupins in the photo on the front page of the Concept Design.
12. "Where possible use weed free sources of gravel to develop the carpark" is optimistically inserted into many consent applications. In our experience this commitment is forgotten with successive staff turnover common in hospitality businesses, and the broom quietly creeps away into the forest and grassland. The commitment to weed control in the Additional Information needs to be tied down at the outset, with a legally binding agreement to an ongoing weed control programme with details of the weed control methods acceptable to the Department.
13. For an application that intends to showcase the natural biodiversity, the lack of a survey and assessment of the birds, lizards and bats in the immediate area is puzzling.
14. We think the concept of high-value conservation-focussed accommodation and guided nature experience is meritorious. We would like to see it sited outside the Fiordland National Park. We think it would benefit from a site on private land where there is more room to develop the site without the formal constraints of a lease from the Department of Conservation. We hope that an alternative site can be found.

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

To avoid contravening the General Policy for National parks, the Fiordland National Park plan, environmental, landscape impacts and the diminished perception of wilderness we wish to see the application declined in full.

G. Your Signature



_____ 15 July 2019 _____
Date

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

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