

ADDITIONAL INFORMATION LETTER FROM DOC – RESPONSE

Date: 7th April 2019

Item 1

Regarding application form 3b, section D: you have stated this application is not an exclusive possession. Unless the buildings are open to the public it is considered an exclusive possession. Considering this, are you applying for an exclusive possession?

Our Response

Site will require exclusive possession.

Item 2

Regarding application form 3b, section F: you have applied for a 60 year term (30 years plus a right of renewal for an additional 30 years). Under section 17Z(1) of the Conservation Act a lease may be granted for a term not exceeding 30 years, unless the Minister is satisfied that there are exceptional circumstances, in which case up to 60 years may be approved.

Given this information, please explain why you require a 60 year term and how your application can be considered an exceptional circumstance.

Our Response

Southern Discoveries as the applicant is intending to invest between \$11 and \$12 million to construct high quality sustainable buildings that will have a useful life of at least 50 years. To be constrained to a lease period of 30 years will have serious economic consequences for the company and will significantly increase both financing and depreciation costs and also create the risk of having to abandon the buildings when they are just 60% through their economic life. We believe that our application for lease terms that are aligned to the useful economic life of the proposed structures is both reasonable and essential to the overall sustainability of the buildings intended use.

Item 3

Explain how the application fits with the Fiordland National Park Management Plan (<https://www.doc.govt.nz/about-us/our-policies-and-plans/statutory-plans/statutory-plan-publications/national-park-management/fiordland-national-park-management-plan/>).

Our Response

The application for the proposed accommodation facility is consistent with the Fiordland National Park Management Plan 2007 and in particular the relevant prescriptions that apply to the accommodation activity area and in the parking activity area at Milford Sound.

The relevant prescriptions state:

- Accommodation Activity Area

33. This is the only area where staff accommodation facilities will be provided at Milford Sound...

- Parking Activity Area

39. The following activities will be located at this site:

b) Any community-based facility associated with the Accommodation Activity Area ...”

Item 4

Provide a large-scale map showing the location of the current accommodation site and the proposed lease area, incorporating the wider Milford Sound area for context.

Our Response

