



Department of Conservation
Te Papa Atawhai

To: Nedra Burns, Operations Manager – Te Anau District, as Delegate of Minister of Conservation

From: Judi Brennan, as Delegate of Director-General of Conservation

Date: 8th July 2019

OBJECTION AND SUBMISSION SUMMARY RECOMMENDATION REPORT

1.0 APPLICATION DETAILS

Applicant: Southern Discoveries

Permission Number: 50670-ACC

Permission Type: Notified Lease application

Brief activity description: Application for staff accommodation at sites B2 and H3 in Cleddau Village, Milford Sound, Fiordland National Park.

2.0 PURPOSE

This report is provided pursuant to section 49(2)(d) of the Conservation Act 1987 and provides you with a summary of all objections and submissions/comments received in response to public notification with:

- Recommendations to the extent to which:
 - objections should be allowed and
 - submissions/comments accepted.
- A recommendation on the application so you can decide whether to proceed.

The implications of allowed objections and accepted submissions/comments are noted for you to assist you in forming a view *'before deciding whether or not to proceed with the proposal'*, pursuant to section 49(2)(e) of the Conservation Act.

I note that any recommendation, as the Director General's delegate, that I make to you in no way fetters your discretion in considering all the relevant issues of this application.

3.0 BACKGROUND

This is an application for the construction of three staff accommodation buildings on lease areas B2 and H3 in the Cleddau Village, Milford Sound.

The total area required for the lease is 2,304 m2. This encompasses two lease areas to accommodate the buildings and a lease area extension for car parks.

The application was received on 2nd February 2019 and publicly notified on Saturday 1st June 2019 in the following ways: DOC website, Otago Daily Times, Southland Times and Advocate South. The notification period closed on Monday 1st July 2019.

Two submissions were received and none of the objectors/submitters asked to be heard, consequently no hearing is required.

5.0 SUMMARY OF KEY POINTS FROM OBJECTIONS AND SUBMISSIONS

Two written objections and submissions were received as part of the public notification phase.

The first submission focused on general staff accommodation within National Parks. The second on the stresses of car parking at Milford Sound and the lack of plans within the application to illustrate the scale of the proposal in relation to the rest of the village.

6.0 ANALYSIS OF OBJECTIONS AND SUBMISSIONS/COMMENTS

Submission 1: Staff accommodation within National Parks in general

From: Yvonne Curtis (*contact details removed from website version*)

"I am against granting this concession on principle. I am worried that the black and white thinking that led to the sale of the Hotel Corporation holdings will mean that now the pendulum will swing too far the other way and we allow too much incursion into our national parks.

I am concerned that the building of staff accommodation will set a precedent for increased private buildings in a public national parks. What works, and I have seen in other countries, is building the necessary accommodation and other services outside the park borders. We are a small country with equal visitors to our population and we need to be careful that we do not kill the goose that lays the golden egg"

NOTE: The Permissions Advisor emailed the submitter twice to determine if she wanted to be heard. No response was received.

I recommend that this submission is not allowed, or accepted, because it is a general comment which does not relate to this specific concession application.

Submission 2: Car parking and site coverage

From: Rosco Gaudin, Milford Sound Sea Kayaks Ltd

“My submission on this application is concerned about two factors regarding Car Parking and site coverage. The applicant states that car parks are proposed either side of Pembroke Drive. This is not acceptable. The submitter does realise that parking for all staff is at premium and suggests that the Department meet with all affected parties to come up with an alternative option that works for all leases in that area. The second point is regarding the site coverage regarding the size of the building footprint v the rest of the site. It was a bit hard to see the scale of that in the submission and I would like to see that in a bit more detail please.

My submission is against this application until the parking issue is sorted. I am happy to be heard at any submission meeting in the future.”

The Permissions Advisor asked the submitter to clarify if he wanted to be heard regarding this application and he stated:

“I do not necessarily need to be heard on the application itself but I would do so if the meeting was to do with the parking crisis that Milford has every summer ... combine this with SD [presumably Southern Discoveries] staff plus other Pembroke Drive staff and company vehicles then add the F I T cars and campervans and we have a HUGE issue that will not go away and just keep getting worse and needs to be addressed sooner than later.”

Consequently, no hearing was requested.

This submission contains some valid points. The cumulative effects of additional cars parking in Milford Sound, and Pembroke Drive in particular, are potentially adverse and this should be considered in the final Decision Support Document.

As suggested by the submitter, a plan to illustrate the scale of the proposal in relation to the rest of the village would be useful to fully appreciate the extent of the proposal, particularly if a Design Review Board is commissioned.

I recommend that this submission (specifically car parking and site coverage) is allowed because it relates to the nature of the activity and its effects (under S17U(1)(a) and (b) of the Conservation Act).

Similarly, I recommend that this submission is accepted because it relates to the nature of the activity and its effects (again, under S17U(1)(a) and (b) of the Conservation Act).

8.0 RECOMMENDATIONS

Pursuant to s 49(2)(d) and (e) of the Conservation Act 1987, I have made recommendations to you in respect of the extent to which objections should be (i) allowed and (ii) submissions/comments accepted, see table below.

In addition, I make the following recommendation for seeking further information:

- the applicant be asked to provide plans showing the size of the building in context with the rest of the village.

This was requested by a submitter and will be useful to fully assess the effects of the application.

Summary of submissions raised as an objection and recommendations on the extent to which they should be allowed:

Submitter/ Issues	Summary of issues raised as an objection	Raised by	Recommendation	Reason
Submitter 1: Staff accommodation in National Parks in general	Building of staff accommodation will set a precedent for increased private buildings in National Parks.	Yvonne Curtis	Do not allow	Does not relate to this specific concession application.
Submitter 2: Issue 1 Car parking	The proposed car parking spaces will place additional stress on the already stretched parking situation at Milford Sound.	Rosco Gaudin	Allow	Relates to the nature of the activity and its effects (S17U(1)(a) and (b) of the Conservation Act).
Submitter 2: Issue 2 Site coverage	Lack of schematics showing the size of the building in context with the rest of the village.	Rosco Gaudin	Allow	Relates to the nature of the activity and its effects (S17U(1)(a) and (b) of the Conservation Act).

Summary of issues raised as submissions/comments and recommendations on the extent to which they should be accepted:

Submitter / Issues	Summary of issues raised as an objection	Raised by	Recommendation	Reason
Submitter 1: Staff accommodation in National Parks in general	Building of staff accommodation will set a precedent for increased private buildings in National Parks.	Yvonne Curtis	Do not accept	Does not relate to this specific concession application.
Submitter 2: Issue 1 Car parking	The proposed car parking spaces will place additional stress on the already stretched parking situation at Milford Sound.	Rosco Gaudin	Accept	Relates to the nature of the activity and its effects (S17U(1)(a) and (b) of the Conservation Act).
Submitter 2: Issue 2 Site coverage	Lack of schematics showing the size of the building in context with the rest of the village.	Rosco Gaudin	Accept	Relates to the nature of the activity and its effects (S17U(1)(a) and (b) of the Conservation Act).



Judi Brennan, Delegate of the Director General of Conservation as Permission Manager

Date: 9/07/2019

Recommendation:

1. Note the summary of objections and comments received during the public notification process:

Yes / ~~No~~

Comments:

2. Note the recommendations as to the extent to which objections should be allowed and submissions should be accepted:

Yes / ~~No~~

Comments:

3. Note the recommendations on further information to be considered:

Yes / ~~No~~

Comments:



Nedra Burns, Operations Manager – Te Anau District. Delegate of the Minister of Conservation

Date: 19/7/2019

