

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL PROPOSED DISTRICT  
PLAN HEARINGS PANEL**

**UNDER the Resource Management Act 1991**

**IN THE MATTER OF the Proposed Queenstown Lakes District  
Plan**

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**STATEMENT OF EVIDENCE OF FIONA BLACK  
ON THE SUBMISSION BY REAL JOURNEYS LIMITED AND SUBSIDIARY COMPANIES  
(REAL JOURNEYS GROUP) ON STREAM 15 OF PROPOSED DISTRICT PLAN**

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## INTRODUCTION

1. My full name is Katherine FIONA Black. I work for Real Journeys Limited mainly managing Real Journeys and its subsidiary companies' Department of Conservation Concessions; Resource Consents and other regulatory authorisations, along with other operational related duties. I am authorised by these companies to give this evidence on their behalf.
2. I have worked in the New Zealand Tourism industry for 31 years; the last 14 years, for Real Journeys; in the first instance as the Milford Sound Branch Manager and for the last eleven years in my current role. Consequently I have gained a considerable knowledge of the tourism industry, including the evolving challenges faced by this industry. Also since 2011, I have been a member of the Southland Conservation Board and I have recently been reappointed for another three year term.
3. I qualified as a commercial Launch Master in 1988 and worked as a skipper on a tourism vessel on Otago Harbour, until 2002. In 2018 I became one of the four Real Journeys staff who exercise control or privilege under Real Journeys Maritime New Zealand, Maritime Transport Operator Certificate with responsibility for ensuring our vessel crew are suitably trained and competent.
4. In my role at Real Journeys I am responsible for obtaining resource consents for Real Journeys' operations mainly in Southland and Otago including maintaining about 30 Department of Conservation authorisations (mainly concessions) and approximately 45 resource consents to provide for our core activities in Fiordland and Stewart Island. I have held this responsibility for the past eleven years. Accordingly I have been involved in numerous statutory resource management and land tenure processes.
5. In preparing this evidence I rely on my experience in the field of commercial tourism operations and having to navigate through numerous regulatory consenting / permitting processes.
6. In preparing this evidence I have reviewed and/or refer to the following documents:
  - Section 42A Report prepared by Ms Victoria Jones dated 23 July 2018;
    - Evidence of Mr Stuart Crosswell;
    - Evidence of Mr Michael Smith;
  - Section 42A Report prepared by Mr Jerome Wyeth dated 23 July 2018;
    - Evidence of Mr Trent Sunich;
  - Section 42A Report prepared by Ms Amanda Leith dated 23 July 2018;
  - Section 42A Report prepared by Ms Christine Edgley dated 23 July

2018; and

- Evidence of Ms Jeannie Galavazi.

## **Back Ground**

7. Real Journeys is as much a transport company as it is a tourism company. The Real Journeys group remains a private, family owned company and is now the largest tourism operator in the region with operational bases in Christchurch, Milford Sound, Te Anau, Manapouri, Queenstown, Wanaka and Stewart Island. The company operates 30 vessels (excluding kayaks and rafts) and approximately 50 coaches across the group; Real Journeys employs 500 staff during the peak summer months and in excess of 1000 staff across the group; and 950,000 passengers travelled with Real Journeys in the last 12 months, and 1.4 million across the Group.

The following summarises the expansion of the Company since its beginnings in the 1950s:

- In 1954 Les and Olive Hutchins began operating the Manapouri-Doubtful Sound Tourist Company, running four day excursions to and from Doubtful Sound. In 1966 Les and Olive acquired Fiordland Travel Ltd, with its Te Anau Glow-worm Caves and Milford Track Lake Transport operation and began trading as Fiordland Travel Limited. Continued expansion followed with the purchase of the vintage steamship “TSS Earnslaw” in Queenstown in 1969 and with the establishment of cruises in Milford Sound in 1970.
- Since 2002 Fiordland Travel Ltd has operated all its tourism excursions under the ‘Real Journeys’ brand and in 2006 changed its company name to Real Journeys Limited. In 2013 Real Journeys launched the Go Orange brand; and purchased Cardrona Alpine Resort and the Walter Peak Resort (which Real Journeys previously leased). Then in 2015 Real Journeys purchased the International Antarctic Centre in Christchurch and in 2016 Real Journeys took over 100% ownership of Queenstown Rafting, including Cavell’s café, and purchased Kiwi Discovery coach and ski business (which are now operated under the Go Orange brand along with its Fiordland cruise and kayaking business).
- Through 2017 and into 2018 Cavell’s Café was refurbished including the installation of a micro-brewery and café has been re-launched as Canyon Food and Brew Company which now operates as another standalone Real Journeys subsidiary company. This year, Go Orange purchased Queenstown Water Taxis and Thunder Jet, adding three jet boats and four “water taxis” (with capacities varying from 25 to 45 passengers) into their fleet.

## District Plan Transport Chapter

8. The role of coach tours, shuttle buses and courtesy coaches operated by companies such as Real Journeys / Go Orange in the District's transportation system should be recognised and provided for in the PDP because these vehicle operations significantly reduce traffic congestion, especially in and around Queenstown and on SH6a, SH6, SH97 and SH94.
9. Otago roads around the tourism "hot spots" are being hit by a double whammy with the increase in Chinese visitors coupled with the move away from coach touring to FIT. I believe a large part of the congestion issues around Queenstown are a consequence of this factor.
10. In this context, the transport service role of companies such as Real Journeys (who get visitors to travel via coach rather than rental car), should be recognised and provided for in the district's planning framework.
11. As an example, one of our successful products is transporting people between Queenstown and Milford to service our nature cruise, where up to three 60 seater coaches travel to and from Milford every day in, busy periods. In the year to September 2012, Real Journeys carried 14,100 passengers on coaches ex Queenstown servicing our nature cruises in Milford Sound (only 3% of which were Chinese visitors) and in the year ended September 2017 this increased to 25,270 passengers (10% Chinese visitors).

### Visitor growth and behaviour

12. Most of the recent tourism growth across Otago and Southland, which is stressing our infrastructure, is in a good part the result of growth in visitor arrivals out of China. For the last few years China has been our fastest growing visitor market. Over the last 20 years, Chinese visitors to New Zealand have grown at a staggering 18% p.a. from around 12,000 in 1996 to over 400,000 in 2017. China is now New Zealand's second-largest international tourism market. The current predictions are for Chinese visitor numbers to more than double from 2017 to 2023, to around 913,000 visitors<sup>1</sup>.
13. In addition to growing numbers, the Chinese visitor market is undergoing a rapid shift away from travelling in coaches towards Free Independent Travellers (FIT) (non-tour) where now more than half of Chinese visitors are travelling around NZ in rental vehicles (refer Figure 1 ). Until the 2013-14 summer the majority of Chinese visitors travelled around NZ on touring

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<sup>1</sup> <http://www.chinatoolkit.co.nz/>

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coaches, usually with 22 to 50 passengers per vehicle. However, this is no longer the case. When visitors first started travelling more as FITs they typically travelled in mini buses (e.g. Toyota Hiace) or people carriers such as Toyota Previas' carrying approximately 6 persons per vehicle. Now, they are trending towards travelling in SUVs, often in convoys with as few as 2 persons per vehicle.

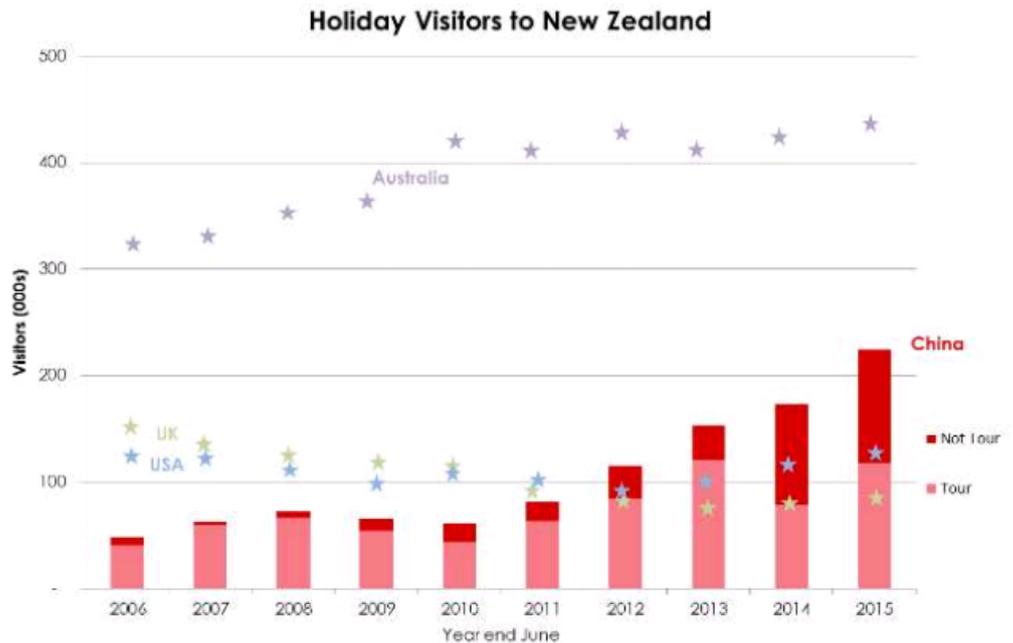


Figure 1 (Source: <http://www.nzcntourism.co.nz/wp-content/uploads/2016/06/china-fit.pdf>)

### Council’s Evidence

#### The role of tourism transport operators in public transport

14. The authors of the Transport Chapter, the Section 42A report and technical evidence of Mr Crosswell and Mr Smith do portray an accurate understanding of the role of the private sector in providing public transport services.
15. In my opinion it is neither practical nor appropriate to exclude private tourism-transport services from public transport services and I believe the private sector provides a significant role in transporting members of the public around the district. For example:
  - For decades Real Journeys coach services between destinations such as Queenstown and Milford Sound have and continue to be available to the public. In the year to September 2017 Real Journeys carried 1,180 passengers between Queenstown and Milford Sound over and above those passengers who went on to a Real Journeys nature noted in para 11 above. These coach services to and from Fiordland run to a regular

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timetable year round providing a reliable service. Jucy Coaches, Great Sights and Intercity provide similar coach services.

- Real Journeys has recently begun operating a daily coach service to and from Bluff ex Queenstown to enable people to have readily access to Stewart Island.
- In the year to September 2017 the “TSS Earnslaw” carried 3,380 paying passengers on a one way trip to or from Walter Peak. These passengers are cyclists, motorcyclists accessing the Mount Nicolas Beach Bay Road and people who live on the Walter Peak side of the lake. These one way options are not promoted by Real Journeys (and in the Real Journeys scheme of things this is not a large number) but these passengers demonstrate that there is not a straight forward division between ferry services and tourism activities.
- Conversely, in my experience it is not uncommon for visitors in other cities to use public transport services for the purposes of tourism (for example a German study found that *“The well-developed public transport system in Munich appears to be attractive to the visitors. This suggests that if the public transport is good enough, visitors would use it.”*)<sup>2</sup>.

Definition of Public Water Ferry Service

16. I do not agree with Mr Crosswell’s statement that *“Tourism-based cruises and charters, whilst not excluding the public, certainly have the potential to be more variable in nature and have the potential to significantly impact scheduled operations...”*. On Lake Wakatipu the “TSS Earnslaw”, the “Explorer” and the “Spirit of Queenstown” all operate to fixed timetables, rarely undertake charter cruises at unscheduled times and these vessels carry the vast bulk of all tourists undertaking cruises on the Lake.
17. I do not agree with Ms Jones assessment that *“it is appropriate that the definition of ‘public water ferry services’ does not include water transport systems that are primarily for sightseers as such trips do not contribute to achieving the Chapter 29 objectives relating to an integrated transport system and increased use of public transport.”* I contend that Water Taxi services and regular ferry services are mutually exclusive and it would be very difficult to rationally put a vessel in one category or the other, given the range of clients using the service.
18. In the Queenstown context the visitor industry is probably the main contributor to traffic congestion and therefore water transport services need to appeal to this sector. It is logical that water transport services are

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<sup>2</sup> [https://ac.els-cdn.com/S2212571X13000772/1-s2.0-S2212571X13000772-main.pdf?\\_tid=ef6dd2cd-f077-4953-a587-093e1f3a1aec&acdnat=1533084847\\_6337dafd69ebb12e46c7e7dcf96ebe6f](https://ac.els-cdn.com/S2212571X13000772/1-s2.0-S2212571X13000772-main.pdf?_tid=ef6dd2cd-f077-4953-a587-093e1f3a1aec&acdnat=1533084847_6337dafd69ebb12e46c7e7dcf96ebe6f)

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encouraged to provide more than just ferries so they can offer visitors a hybrid service of sightseeing plus transport.

19. To be feasible, water transport operators need to be able to offer an additional benefit to attract visitors out of their rental vehicles (visitors typically want to get value for their money so use their rental vehicle as much as possible, especially at peak times when day rental rates are higher).
20. Water Taxi services require flexibility to meet the variable needs of visitors and respond to additional capacity demands: <sup>3</sup>
  - Total guest nights in Queenstown for the year to March 2018 were 3.6 million — 3 per cent up on the previous year.
  - Queenstown’s relatively remote location results in approximately 45% of visitors arriving by air (2 million passengers arrived by air in December 2017) and the remainder arriving by vehicle.
  - The way visitors travel has changed with a shift to free and independent travellers utilising self-driving opportunities rather than the more traditional tour coaches as their main mode of transport. With increasing visitor numbers Queenstown is now the second largest vehicle hire port in New Zealand with over 2,000 rental vehicles currently available.<sup>4</sup>
21. I take issue with Mr Crosswell’s implied suggestion (by prescribing a distinction between public water transport and private/commercial transport operations) that private/commercial transport operations pose a greater health and safety and environmental risk. This is simply not true and there is no evidence to support this. Public water transport operations are not inherently safer than commercial vessel operations. Moreover, these transport activities all operate under the same health and safety legislative requirements, namely the Maritime Transport Act 1994 and MNZ rules.
22. Finally, I query the validity of adopting the Public Transport Management Act 2008 definition of Public Water Ferry Service. This legislation was repealed on 13 June 2013, by section 71(1) of the Land Transport Management Amendment Act 2013 (2013 No 35). I observe the Land Transport Management Act 2003 defines a public transport services as follows:

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<sup>3</sup> [https://www.nzta.govt.nz/assets/userfiles/transport data/Public%20Transport%20by%20Ferry.pdf](https://www.nzta.govt.nz/assets/userfiles/transport%20data/Public%20Transport%20by%20Ferry.pdf)

<sup>4</sup> <https://www.shapingourfuture.org.nz/assets/Uploads/10a.-Attachments-Queenstown-Integrated-Transport-Strategy.pdf>

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**public transport service—**

*(a) means, subject to paragraph (b), a service for the carriage of passengers for hire or reward by means of— (i) a large passenger service vehicle; or (ii) a small passenger service vehicle; or (iii) a ferry; or (iv) a hovercraft; or (v) a rail vehicle; or (vi) any other mode of transport (other than air transport) that is available to the public generally; but*

*(b) in relation to Part 5, does not include— (i) an excluded passenger service; or (ii) a shuttle service*

Parking Strategy and Parking Requirement Provisions

23. I have doubts about Mr Crosswell's statement that "Evidence suggests the availability and price of parking is an important factor influencing people's decision to drive." I understand this evidence is based on overseas studies from the likes of 2013/14 Norwegian National Travel Survey<sup>5</sup>. Mr Crosswell seems to have ignored the fact that countries such as Norway have a well-established public transport system with a large network of buses, trains, and ferries unlike New Zealand and unlike Queenstown.
24. Moreover there is no reference to the fact Queenstown is a tourism destination in the perspective of Mr Crosswell's evidence with regard to parking. As stated above 55% of visitors to Queenstown arrive by vehicle and Queenstown the second largest vehicle hire port in New Zealand. Consequently there are always a considerable number of rental vehicles in Queenstown throughout the year.
25. The impact of rental car use in Queenstown is exacerbated by the portion of the FIT Chinese tourist visiting Queenstown as the Chinese place a higher priority on the prestige value or brag value of their holiday over cost, hence the trend to renting Toyota Highlanders one of the most expensive rental vehicles on the market.<sup>6</sup>
26. These factors will continue to be significant as the numbers of Chinese holiday visitors are increasingly choosing to travel as FIT rather than groups. The proportion of Chinese visitors travelling independently was 49 per cent in the year to September 2017, well up on the 17 per cent who chose to "freedom travel" four years earlier.<sup>7</sup>
27. Consequently, I consider that the provisions of the PDP should not ignore the parking requirements of the visitor industry.
- 26 Real Journeys believes it is important that visitors are provided with enough secure carparking so visitors will leave their rental vehicle unattended all

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<sup>5</sup> <https://www.toi.no/travel-behaviour-and-mobility/the-norwegian-national-travel-survey-2013-14-article32991-836.html>

<sup>6</sup> <https://scholarworks.umass.edu/cgi/viewcontent.cgi?article=1912&context=ttra>

<sup>7</sup> <https://www.tourismnewzealand.com/media/3418/china-visitor-information.pdf>

day. More specifically, to get visitors to use public or private transport (rather than driving themselves to destinations), visitors should be confident that their vehicle and valuables will be safe. A UK survey found that drivers use a wide range of criteria to choose where to park (up to ten criteria were identified). Nevertheless *“their overriding concern is ‘location’, in other words, proximity of the car park to the amenity or location which represents the very purpose of their trip. The next most important is safety and security, both in personal terms and with regards to the vehicle itself.”*<sup>8</sup> In fact four factors on the list related to safety and security.

**Figure 2.**  
The top 10 factors for customers when selecting a car park to use are ranked as follows:

Ranking	Car Park Users
1	Location
2	Personal safety
3	Safe environment
4	Tariffs
5	Ease of access
6	No/little queuing
7	Number of spaces
8	Effective surveillance
9	Size of parking space
10	Appropriate lighting

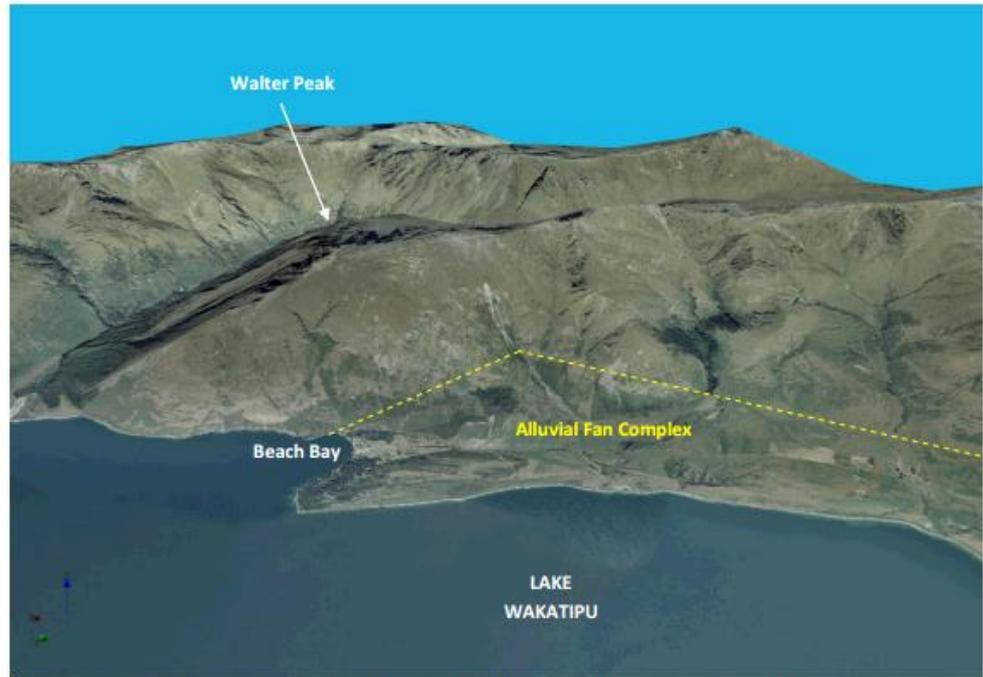
28. To conclude Real Journeys wishes to ensure that the transport provisions of the PDP adequately provide for tourism activities across the District and enables water transport activities on Lake Wakatipu.

### Earthworks Chapter

- 29 The 155 hectare property owned by Te Anau Developments at Walter Peak is located on an “Alluvial Fan Complex”. Alluvial fans typically occur near the boundary between hill slopes and valleys and as the gradient decrease the flood path widenings and where a gully meets the valley floor encourages the deposition of sediment, which accumulates over time to form a fan-shaped landform.

<sup>8</sup> <https://thegreatbritishhighstreet.co.uk/pdf/GBHS-What-Works.pdf>

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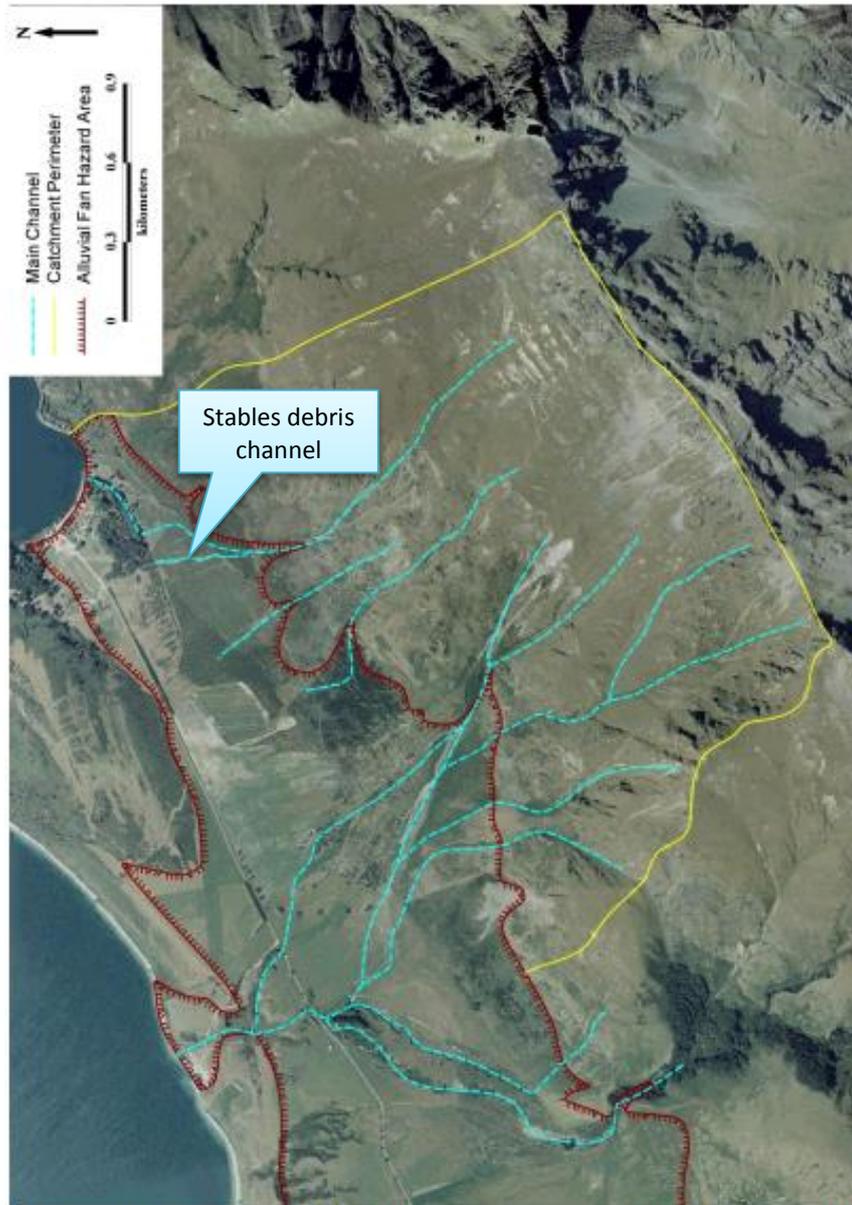


**Figure 8.1** Image showing the Walter Peak alluvial-fan complex with respect to the surrounding environment

- 30 Persistent avulsion, channel aggradation and erosion are common across all fans at Walter Peak. Specifically the area is subject to recurrent debris, debris-flood flow and floodwater-inundation alluvial-fan processes. Moreover the catchments that feed alluvial fans in the Walter Peak area are very steep (refer Figure 8.2 below). Gullying and the over-steepening of slopes have led to further incision of the surficial-slope deposits, which are prone to failure and subsequent debris-flow initiation during high-intensity storm events.<sup>9</sup>

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<sup>9</sup> <https://www.orc.govt.nz/media/2948/otago-alluvial-fans-high-hazard-fan-investigation.pdf>  
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**Figure 8.2** Walter Peak alluvial fans and catchments, noting some key alluvial fan features; aerial photo taken in February 2006

- 31 The Walter Peak alluvial fan has been identified as high hazard alluvial fan by ORC and QLDC along with 9 others in the Queenstown Lake District. It is not uncommon for debris flows to occur close to our facilities buildings and across to Mount Nicolas Beach Bay Road.
- 32 The last time a flood event caused debris to flow down the “Stables” debris flow channel occurred was in May 2014 when the debris flowed out on to Mount Nicolas Beach Bay Road. Refer photos below.

Figure 3. Photo of 2014 debris flow down the Stables Channel



Figure 4. Photo of 2014 debris flow over Mount Nicolas Beach Bay Rd



- 33 Te Anau Developments holds a Department of Conservation Concession to construct rock culverts and rock armouring, undertake stream deepening and tree planting as part of flood protection programme in the Beach Bay Recreation Reserve.

- 34 This concession and rules 14.3.1, and 14.4.1 of the Regional Water Plan for Otago have allowed us to maintain the rock culverts and rock armouring in the Beach Bay Recreation Reserve and protect our buildings at Walter Peak from these floodwater-inundation alluvial-fan processes and I contend that requiring additional QLDC authorisation for these activities is unwarranted when this worked is being managed by both ORC and DOC already.
- 35 Accordingly because of the on going risk associated with recurrent debris, debris-flood flow and floodwater-inundation alluvial-fan processes Te Anau Developments is seeking to ensure that the District Plan's earthworks provisions enable earthworks to be undertaken within and around alluvial fan channels to protect buildings and property.
- 36 Specifically Real Journeys is requesting that the standards in 25.5.20 be deleted or adequately amended to provide for the management of Alluvial Fan Complex sites, especially considering it is one of only ten other sites in the District.
- 37 With respect to Cardrona Alpine Resort the exclusion of Ski Area Sub-Zones from the earthworks rules, was adopted to enable the development of ski areas, recognising their importance in contributing to the social and economic well-being of the community.
- 38 Significant pressures are facing the ski/snowboarding industry with rising costs of operation; increasing expectations from guests; increased safety requirements; potential climate change issues; the fast paced nature of changing trends; and the need to create more unique products to ensure financial viability in the future. The District Plan needs to be future focused and support the ability for ski areas to adapt and make the appropriate changes to develop further recreational opportunities. This will support the continued development of recreational opportunities as well as helping to ensure the continued growth of the local/national economy and employment market. By the nature of our operation the need to change the landscape through earthworks is fundamental to our viability as a company to meet current and future changes.
- 39 Ski Area Sub-Zones are specifically provided for in the District Plan and these zones anticipate and provide for the kinds of activities traditionally carried out within ski/snowboarding fields. These activities, of necessity, include 'terraforming' the landscape involving extensive earthworks. Such earthworks are an integral and essential aspect of the construction, operation, and maintenance of ski/snowboarding areas and more recently mountain bike and carting trails.

- 40 Specifically modern ski fields require more than groomed trails to attract skiers and snow boarders. Ski areas now need to incorporate terrain parks that include ramps / jumps, rails, half pipes, table tops and banks; all of which require earthworks to create the features and to maintain. These speciality features are developed over summer and only tested thoroughly over winter and then refined in the following summer. Trails are also developed in a similar fashion with identified improvements and safety issues assessed during the winter season and modified in the summer.
- 41 Also terrain park features are essential to the economic viability of ski areas such as Cardrona Alpine Resort. However these features are subject to trends and after a few seasons a particular feature of Cardrona Alpine Resort's terrain park may need to be replaced or refined requiring more earthworks. The development and maintenance of a terrain park is constantly evolving and an enabling earthworks framework is essential to the operational success of Cardrona Alpine Resort
- 42 Providing recreational opportunities for ski/snowboarders has an inevitable outcome of the area undergoing major change through earthworks. This change will result in major effects on natural landforms, prominent ridgelines, and the like. Despite the extent of the earthworks undertaken at Cardrona Alpine Resort there have been no recorded complaints about offsite effects from dust or sediment created during the aforementioned terraforming processes. In fact the areas of major effect are limited in scope, and in area, when considered in the context and scale of the Queenstown Lakes District.
- 43 Refer photos below show the extent of the earthworks for the Cardrona Alpine Resort in the summer and winter months and that in winter when the mountain is covered in snow most of the terraforming is not noticeable.



Figure 5. Cardrona Alpine Resort (summer)



Figure 6. Cardrona Alpine Resort (winter snow cover)



Figure 7. Terrain Park Features (summer)



Figure 8. Terrain Park Features (winter)

- 44 Go Orange holds three ORC resource consents for the purpose of improving navigational safety on the Shotover River for rafting companies.
- 45 Because of the dynamic nature of the river system these consents approve as and when required disturbance or alteration of the Shotover River for activities such as blasting of specific rocks in the river bed, locating and placing rocks and gravel into the infilled section of the Toaster Rapid and maintaining the diversion of a part flow of the Shotover River.

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- 46 In addition in 2008 a large slip above the Shotover River closed the river to commercial rafting operators for six weeks (refer Figure 2 below). The 30,000 tonne slip was removed by 'water jacking' where 2L of water per minute was pumped over and through the slip for 6 days. The majority of the fallen slip fanned out into the chutes above the river, with a small amount of rock getting to the river. However it was feared that all the slip material would fall into the river and dam the river.<sup>10</sup>
- 47 Because of ongoing risks of similar slips and because of the constantly changing nature of the river Go Orange requires district plan provisions that provide for the clean up of such slips and the movement of rock in and around the river to maintain the river in a safely navigable condition.



Figure 9. Photo of the 2008 slip before it was released by water jacking

- 48 Our request for Rule 25.3.4.5(f) to be amended (to apply to planting generally rather than only exempting earthworks associated with the planting of riparian vegetation) relates primarily to the example of the Walter Peak Restoration Project (refer figures below). So far as part of the project over 12,000 native trees and shrubs have been planted and there

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<sup>10</sup> <https://www.odt.co.nz/regions/queenstown-lakes/fears-slip-may-block-river>  
<https://www.odt.co.nz/regions/queenstown/council-approves-water-jacking-shotover-slip>  
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are more to come throughout the 115ha property.<sup>11</sup> I believe such restoration projects should be able to proceed without the need for Resource Consent.



Figure 10 Photo of Walter Peak from early 2015



Figure 11 Photo of Walter Peak from 2016

## Signage Chapter

### *Information, directional and interpretation signage*

- 49 Real Journeys seeks that the PDP should provide for the ready establishment of information, interpretation and direction signs on private land and enable/support to the installation of interpretation signage on public land by private organisations.

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<sup>11</sup> <https://www.realjourneys.co.nz/en/about-us/conservation/walter-peak-land-restoration-project/>

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- 50 Real Journeys is requesting the signage provisions allow for relevant information, interpretation and direction signage to be installed in “open spaces” to provide for the necessary signage that is required to operate tourism operations such as Cardrona Alpine Resort and “Walter Peak High Country Farm”.
- 51 I agree with Treble Cone's submission that signage is required to manage large numbers of people. The same thing is required at Walter Peak where in the summer months over 1000 people a day are visiting the site. Like the Treble Cone and Cardrona Ski Fields Areas, at Walter Peak numerous directional and information signage is required around the property to enable visitors to find their way around (refer photos below for examples).



Figure 12 Photo of the woolshed at Walter Peak



Figure 13 Photo of utility shed at Walter Peak with information signage

- 52 Real Journeys also seeks that “interpretation” signage be enabled in the PDP provisions. Real Journeys intends on establishing interpretation signage at our visitor attractions because it helps illustrate the significance of a site or the experience and encourages visitors to learn more about the destination enriching their experience.<sup>12</sup>
- 53 The photo below provides an example of interpretation signage Real Journeys has established at the Te Anau Glow Worm Caves (located in the Southland District).

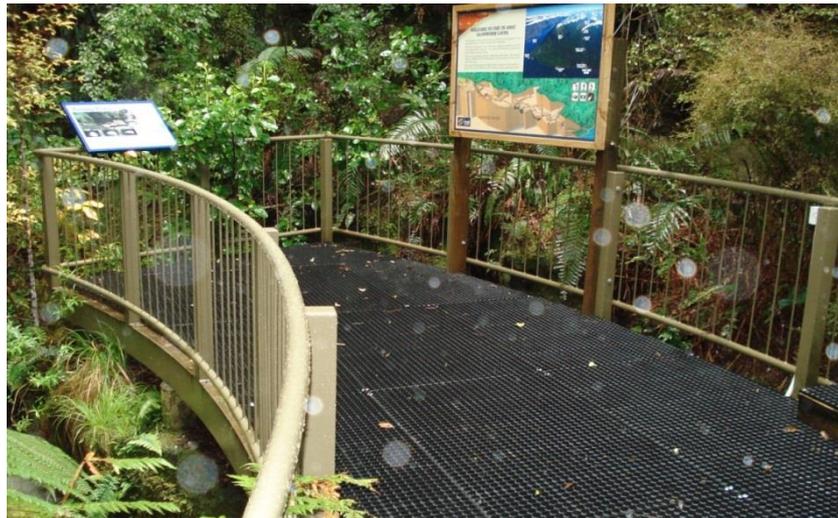


Figure 14. Photo of one of the viewing platforms at Te Anau Caves

- 54 The photo below shows another example of interpretation signage on public land, established by a private organisation (IPENZ), which I think should be enabled by the signage provisions.



Figure 15. IPENZ Plaque commemorating the “Antrim” Steam Engine (on public land)

<sup>12</sup> <https://www.doc.govt.nz/documents/about-doc/role/policies-and-plans/interpretation-handbook-complete.pdf>

*Ski Area Sub-Zones (SASZ)*

- 55 Real Journeys generally supports the new signage objectives and policies being recommended for the s.42A Report for the SASZ. However, I contend the PDP provisions should unambiguously permit temporary and sponsorship signage. Cardrona Alpine Resort hosts mainly sport events which are sponsored and for these sponsors to get the benefit of this sponsorship the event needs to profile the sponsor. This is typically done through extensive temporary signage which is then seen in media coverage of the event.<sup>13</sup> Refer photos below.

Figure 16. Photos of events at Cardrona Alpine Resort



<sup>13</sup> <https://sportnz.org.nz/managing-sport/search-for-a-resource/guides/fundraising-and-sponsorship>



- 56 In addition the proposed permitted standard of 4m<sup>2</sup> is far too onerous and will not be workable. Cardrona Alpine Resort has multiple buildings (including 8 café/bars), amenities, passenger lift systems, ski runs or slopes etc. These facilities all require directional and information signage to manage the flow of people through the site (refer images below for examples). Additionally, some of this signage is swapped out or supplemented in summer to provide directions for visitors undertaking summer activities such as mountain biking and carting.



Figure 17. Photo of directional Signage at Cardrona Alpine Resort



Figure 18. Layout of Cardrona Alpine Resort Base buildings



Figure 19. Mountain Route Map

*Temporary Event Signs (31.6.2(d))*

- 57 I contend a maximum of two signs visible from any State Highway and two signs visible from any other road is insufficient, in particular in relation to sponsorship signs associated with temporary events. Events simply would not happen without sponsorship. In reward for their sponsorship sponsors want or require their signage to be visible to their target market, and often visible to as many people as possible.
- 58 Real Journeys is concerned about the maximum permitted size of signs visible from any State Highway in the context of rule 31.6.12 especially because State Highway 6 and 6A are the main thoroughfares into Queenstown. A sign of 2m<sup>2</sup> area with text 120mm / 160mm in height and maximum number 40 of characters will seriously limit opportunities. For instance the following banner has 56 characters plus a symbol and really only imparts the minimum amount of information to profile the event and does not include the likes of a website or a phone number. If it was scaled up so the smallest text was 120mm in height the banner would be at about 13 m<sup>2</sup> in area, even when the image has been significantly cropped to remove the surrounding white space.



Figure 20. Winter Festival Banner

- 59 In fact I have done a scale drawing for sign of 2m<sup>2</sup> area with 120mm height text (refer below) which provides the minimum information regarding the winter festival. This demonstrates how unworkable these proposed standards are in terms of providing for effective marketing tools.



Figure 21.

- 60 Real Journeys also have concerns that the off-site signage rules will restrict the ability of community groups to obtain funding from business sponsors. For instance in Te Anau, Real Journeys assisted in funding of the construction and on going Repairs and Maintenance of the Fiordland Community Events Centre through a sponsorship arrangement. As part of this sponsorship deal Real Journeys signage was included prominently on the exterior of the building (refer photo below).
- 61 I believe the off-site signage provisions need to be more flexibility so that they can accommodate signage which will be of community benefit.



Figure 22. Photo of Fiordland Community Events Centre in Te Anau

*Rule 31.5.18(c)*

62 I believe this clause should be deleted as it is unrelated to signage and the signage issue is captured in 31.5.18 d.

63 I consider that the Restricted Discretionary activity status is more appropriate vis-à-vis 31.6 District Wide Rules as by stating the area of discretion, the council will also detail the effects it is concerned about which will provide more direction for “lay persons”. As stated in Ms Leith’s s.42A Report “...lay persons may be more inclined to lodge resource consent applications for signage themselves rather than engaging a resource management professional (or similar) to prepare the application for them.” Also moving to restricted discretionary status does not change the ability of the council to decline an application.

**Open Space and Recreation Zone Chapter**

*Objective 38.2.1*

64 Real Journeys believes it is unreasonable for Objective 38.2.1 to suggest that the District’s residents and visitors open space and recreation need to be **met** through the provision of a wide range of quality open spaces and recreation zones. There are significant open spaces and recreation areas provided through the Crown (lakes and rivers), Department of Conservation, and private land owners such as Te Anau Developments and Cardrona Alpine Resort which serve the community. Because of the type of land largely managed by the council for recreation it is unlikely the council can meet residents and visitors’ needs with respect to recreation especially in relation to water based activities.

*Policy 38.2.1.3*

65 I consider it is unrealistic for Policy 38.2.1.3 to advocate for the protection and enhancement of ecological values, including habitats for indigenous

fauna 'across the board'. Many of District's parks and reserves are highly modified environments where exotic grasses predominate to provide for ease of use and because these parks are "fit for purpose" it is not practical to seek to enhance their ecology.

*Policy 38.2.1.4*

- 66 In New Zealand and overseas conflicts have arisen between different users of public spaces, some of which has gained media coverage; such as personal trainers running so called gym boot camps in public parks or drone use.<sup>14</sup> Consequently Real Journeys considers Policy 38.2.1.4, as notified, is inadequate because it does not provide any guidance concerning the management of these conflicts especially considering the increasing population in the District and growing visitor numbers which will put more pressure on the availability of open space.

*Policy 38.2.2.2*

- 67 Real Journeys contends that Policy 38.2.2.2 is too onerous, in particular with respect to temporary events and filming activities. Over the years there have been numerous wacky events in Queenstown such as the "Undie 500" and it would be hard to argue these activities are always compatible with the role and function of the zone or enhance the values of the zone.

*Policy 38.2.2.5*

- 68 Policy 38.2.2.5 seems to be at odds with the transport chapter. Water based transport services will require land based infrastructure such as access ways, shelters, toilets, car parking, bike parking and in many instances these facilities will need to be located in open space recreation zones. It is very difficult to install such facilities without impacting on the natural character of lake margins or not degrading visual amenity values. This policy is also likely to impact on other water based tourism activities which require land based infrastructure to service their activities (for example toilet facilities for kayakers and rafters). In these instances recreational facilities are required to be located where there is a functional need (especially considering the topography of the land adjacent our waterways) irrespective of the areas ability to absorb development because the environmental impact of not providing toilet facilities would be greater.

*38.2.2.2 and 38.2.2.5*

- 69 Real Journey's concerns regarding Policy 38.2.2.2 and 38.2.2.5 are also relevant with respect to Landscape Assessment Matters for Discretionary and Non-Complying Activities (Rule 38.15). This is because development that does have effects on landscape quality and character; visual amenity;

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<sup>14</sup> <http://theconversation.com/public-park-or-private-gym-boot-camps-or-bloody-nuisance-11664>  
<https://www.stuff.co.nz/auckland/local-news/north-shore-times/64385923/Noisy-drones-annoy-walkers>

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Real Journeys Ltd (2466/2760), Go Orange Ltd (2581/2752), Queenstown Water Taxis (2594/2753) Te Anau Developments Ltd (2494), Cardrona Alpine Resort Ltd (2492/2800)

can have effects on indigenous biodiversity values and cumulative effects. Real Journeys contends these assessment matters need to be amended to ensure tourism activities are not inappropriately restricted across the District. More specifically, clause 38.15.1.2 (d) and (e) are unworkable in their current form. It is hard to argue that proposed activity or development will not reduce amenity values of the wider landscape; and carparking, access, lighting, earthworks and landscaping will not reduce the visual amenity of the landscape. This is particularly relevant in the context of the Rural Chapter plus the Landscapes and Rural Character Chapter that advocate for the maintenance of rural amenity values and the maintenance of the open character of Outstanding Natural Features and Outstanding Natural Landscapes where it is open at present.

*Objective 38.2.3*

- 70 Real Journeys supports the recommended amendment to Objective 38.2.3. However, I do not believe this policy is enabling enough. For example, it is very difficult to argue that some commercial activities have a functional requirement to locate in open space recreation zones and will maintain open space and recreation values. Activities such as the Bathhouse Café (Queenstown Waterfront) and numerous temporary market stalls and coffee cart activities do not maintain open space and recreation values, yet they are appropriate activities with reasonably benign effects on the environment.

*Policy 38.2.3.2*

- 71 The aforementioned concerns also relate to Policy 38.2.3.2 as it is difficult to ensure commercial activities will not degrade the quality, amenity and landscape values of open space. As stated above it can be argued by the mere occupation (without considering other impacts such as signage, pedestrian traffic generation, blocking views) of open space by commercial activities will degrade the quality and amenity values.

*Objective 38.2.4*

- 72 As an operator of various vessels on the District, Real Journeys considers the protection of the vessel and safe navigation (and therefore passengers' health and safety) from adverse impacts from adjacent land based activities is essential. This is especially because resource consent applications for land based activities are unlikely to go to the harbour master for assessment and the council's consenting staff do not have the requisite knowledge to assess if a proposal will have health and safety impacts on water users. I am aware of some ill-advised proposals for Queenstown Bay which would have impacted on the safety of Lake Wakatipu users. For example a proposal to locate a pontoon in the bay and from the open space zone hit golf balls out on to the pontoon fortunately this proposal did not come to anything.

- 73 In summary Real Journeys specifically wants to ensure the Open Space and

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Recreation Zone plan provisions adequately provide for:

- water based activity related infrastructure which is likely to be sited in Open Space and Recreation Zones in many instances; and
- as the “named” sponsor of the Queenstown Winter Festival events (regardless of how wacky they are) are enabled in Open Space and Recreation Zones across the District because we want to ensure such events are not only overly costly to run, but are successful not only for our benefit but the District as a whole.

SIGNED



Fiona Black