

**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**

**STATEMENT OF EVIDENCE OF FIONA BLACK ON PROPOSED CHAPTERS 2
(Definitions), 28 (Natural Hazards) and Whole of Plan**

FOR

Real Journeys Limited (621/1341)

and

Te Anau Developments Limited (607/1342)

Dated: 3 March 2017

1. INTRODUCTION

- 1.1 My full name is Katherine FIONA Black. I work for Real Journeys Limited 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.
- 1.2 I have worked in the New Zealand Tourism industry for 30 years; the last 13 years, for Real Journeys; in the first instance as the Milford Sound Branch Manager and for the last nine 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.
- 1.3 In preparing this evidence I have reviewed the following documents:
 - a) Section 42A Report prepared by Ms. Leith in relation to Proposed Chapter 2 Definitions; and various reports referred to in this document; and
 - b) Section 42A Report prepared by Mr. Barr in relation to Entire Plan and General Comments and various reports referred to in this document.
 - c) Section 42A Report prepared by Ms. Bowbyes in relation to Proposed Chapter 28 Natural Hazards and various reports referred to in this document.

2. SCOPE OF EVIDENCE

- 2.1 For simplicity sake I will only refer to Real Journeys Limited, not Te Anau Developments Limited. Nevertheless the points made are relevant to either or both entities.

3. DEFINITIONS / ENTIRE PLAN

- 3.1 We believe that it is unclear how minor upgrades, repairs and maintenance of private infrastructure is provided for in the Proposed District Plan.
- 3.2 In Real Journeys chapter 12 submission we contended that the PDP should be amended to provide for the maintenance / alterations / upgrading of wharves or jetties as a permitted activity. However in the section 42A report for this chapter Ms. Jones stated that "*A rule permitting the maintenance of wharves etc. is unnecessary as this is covered by existing use rights and as such no change is recommended in this regard.*" Consequently we chose not to pursue the matter.

- 3.3 Nevertheless, PDP rule 26.6.1 defines permitted repairs and maintenance to Historic Heritage; minor alternations and additions to a building and minor upgrading to electricity transmission, distribution or telecommunication line infrastructure have been defined in Chapter 2 when existing use rights would mostly apply.
- 3.4 Yet the PDP does not provide for minor upgrades of other private infrastructure of a similar character, intensity and scale (as a permitted activity) to increase the efficiency or security of such infrastructure.
- 3.5 For instance when different vessels are introduced into service it is usually necessary to make minor modifications to wharves to accommodate different vessels. That is different vessels have beltings at different levels above the water which may lie above the upright rubbing strips of an existing wharf structure which will require the wharf's rubbing strips to be extended. Such changes to vertical rubbing strips or piles may also require additional bracing to maintain the structural integrity of the structure. Nonetheless such structural changes do not change the area of lake occupied by the structure or the nature of the activity authorised by any resource consent.
- 3.6 The same issue is also relevant for in ground infrastructure associated with water supplies; wastewater disposal and treatment, where reticulation systems need upgrading overtime and technology enhancements need to be provided for.
- 3.7 Accordingly Real Journeys contends that the minor upgrading definition should be expanded to provide for upgrades of more than electricity transmission and distribution or telecommunication lines.
4. CHAPTER 28 NATURAL HAZARDS
- 4.1 Real Journeys supports PDP policies which allow existing activities to continue in areas subject to natural hazard risk and policies which provide for development to occur where and when the natural hazard risk is not significantly increased.



2 March 2017