

Before the Queenstown Lakes District Council

Under the Resource Management Act 1991

In the matter of a submission under clause 6, Schedule 1 of the Resource Management Act 1991 on Stage 3B of the Queenstown Lakes Proposed District Plan

Wayfare Group Limited (#31024)

Submitter

Statement of Evidence of Paul Norris

28 May 2021

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Introduction

1. My name is Paul Gerrard Norris
2. I am General Manager for the Tourism arm of the Wayfare Group (Real Journeys and Go Orange). My responsibilities include overseeing all the Wayfare Group's 'Experience' operating teams, including; Health & Safety functions, Asset and Engineering Divisions, and compliance with all the relevant legislation and regulations required to operate a complex tourism business; ensuring that the Sales and Marketing, and financial functions run through the Wayfare arm meet the KPI's of the tourism group (as distinct from the Wayfare ski group and International Antarctic Centre).
3. I have graduated from the University of Otago with Distinction in Entrepreneurship, plus I have 30+ years of practical experience in the Tourism Industry, particularly in maritime and other forms of transportation and logistics'. In the 2021 New Year honours, I was awarded a New Zealand Order of Merit for services to the Tourism Industry and Conservation.
4. I have worked for Real Journeys for 28 years; the last 12 months as General Manager; prior to this as Director of Operations for Real Journeys, with the overall responsibility for all Real Journeys' operational areas; nine years as Area Manager including Milford Sound Operations along with the Manapouri-Doubtful Sound Operations; and nine years directly running the Manapouri / Doubtful Sound Operations. Preceding this, a further six-year period was also spent working in the tourism industry. Over this time I have developed extensive knowledge in operation management and logistics required to work in Queenstown and some of the more challenging geographical areas of the lower South Island and Rakiura / Stewart Island.
5. I am actively involved in various local organisations and community groups such as the Wilmot Pass Road User Group with the Department of Conservation; the Manapouri / Doubtful Sound Commercial Users Group; I am the Chairperson of the Predator Free Rakiura Leadership Group and the Leslie Hutchins Conservation Foundation. I am a Director of Milford Sound Tourism and part of the Wayfare Group senior leadership team.

Executive Summary

6. My evidence provides an overview in respect of Wayfare Group tourism operations within the Queenstown District. The Wayfare Group are appellants to the proposed

Queenstown Lakes District Plan (**PDP**), and which are relevant to Stage 3b Chapter Rural Visitor Zone.

7. Wayfare Group and its subsidiary companies (Cardrona Alpine Resort, International Antarctic Centre, Go Orange and Real Journeys), provide significant tourism, recreational, social, environmental, and cultural benefits to the Queenstown Lakes District. These entities are a significant employer within the District, as well as offering unique and truly exceptional experiences to visitors and residents.
8. Conservation is part of Real Journeys' heritage and a cornerstone of our modern-day business.
9. We understand we are privileged to operate in this spectacular part of New Zealand (and the world), and we take our responsibility to protect New Zealand's natural heritage and preserve our environment seriously. To honour our conservation commitments and philosophy, we work closely with both the Department of Conservation (DoC); the local communities we operate in; including partnerships with organisations such as the Rakiura Māori Land Trust delivering kiwi viewing tours and assisting in development of the first stage of their Rakiura Oneki Southern Wilderness Experience project.
10. Wayfare and its subsidiary companies provide a diversity of tourism offerings in the Queenstown District, including transport services such as: public transport offerings (Public Water Ferry Service); and the transport of passengers to attractions and recreational facilities including the operation of the "TSS Earnslaw". Many of these public transport services are enabled by our fleet of Queenstown based coaches that also operate coach connections to Milford and Doubtful Sound.
11. It is New Zealand's natural environment which attracts the vast majority of international visitors to the region; with the attraction for visitors being able to readily get out into the backcountry and experience these remarkable areas first hand in some form. The tourism and recreational opportunities which the Wayfare Group offers, enables people to connect with, have greater access to, and understanding of these unique qualities and characteristics.
12. The Real Journeys vision is "to share New Zealand with the world through remarkable tourism experiences" and our reputational pledge is a company that our:
 - Our shareholders are proud to own;
 - Our employees are proud to work for;
 - Our customers endorse to their friends; and
 - The community holds in the highest regard.

Our values define who we are and how we treat one another and are as follows:

- Keep it real;
- Make it remarkable;
- Share our backyard;
- Play as one team;
- Do it better; and
- Safe as.

Nonetheless we also aim to foster achievement in line with the values of: Kaitiakitanga; Manaakitanga; and Whanaungatanga.

13. The Wayfare Group 'purpose' is to "accelerate the world's shift to sustainable tourism (for people, our partners, and our planet) by delivering Aotearoa's most memorable experiences". Which is aligned with the Tourism Futures Taskforce recommendations that the future New Zealand visitor economy must be regenerative, resilient and needs to deliver net benefits across all four well beings: social, cultural, environmental and economic.¹
14. Through the implementation of these company visions and values, Wayfare strives to continue to offer high quality and high value tourism products in the District. In particular, this has always been achieved through reinvesting in our company to secure the company's future. Yet without a planning framework that provides for certainty, it is difficult for us to plan for the necessary ongoing company investment, and without this, the business objectives will be compromised. Which could potentially lead to stagnation, loss of market position, loss of employment and economic opportunities for the District, which (despite calls for further diversification) at this time still relies heavily on tourism.

Background to The Wayfare Group

15. Real Journeys Limited has been operating for over 65 years. In 1954 Les and Olive Hutchins began operating the Manapouri Doubtful Sound Tourist Company, running excursions from Manapouri to Doubtful Sound and return. In 1966 Les and Olive acquired Fiordland Travel Limited, with its Te Anau Glow-worm Caves and Milford Track Lake Transport operation and began trading as Fiordland Travel Limited. Ongoing expansion followed with the acquisition of the vintage steamship "TSS Earnslaw" (from NZ Railways) in Queenstown in 1969 and with the establishment of cruises in Milford Sound in 1970.
16. In 1992 'The Deed of Agreement' between our company and The New Zealand Railways Corporation provided for the purchase of the "TSS Earnslaw" (she was previously chartered from NZR); and the following physical structures: The Steamer Wharf; The Mount Nicolas Station Wharf and the Frankton (Kelvin Heights) slipway. Hence it was in 1992 that the then Fiordland Travel purchased the aforesaid assets.

¹ <https://www.mbie.govt.nz/assets/the-tourism-futures-taskforce-interim-report-december-2020.pdf>

17. Since 2002, Fiordland Travel Limited has operated all its tourism excursions under the "Real Journeys" brand; in 2004 Stewart Island Experience (operating the Stewart Island Ferries) was established; and in 2006 changed its company name to Real Journeys Limited and 2010 took over 100% ownership the sea kayaking operator Fiordland Wilderness Experiences. While remaining a 'family' business, the company continued to expand with the purchase of Fiordland Explorer Cruises in 2012; Cardrona Alpine Resort; 155 hectares of land at Walter Peak along with the "Convella" Queenstown wharves in 2013; and the International Antarctic Centre in Christchurch in 2015.
18. In 2013 Real Journeys combined Fiordland Wilderness Experiences and Fiordland Explorer Cruises to create the Go Orange brand which was further expanded in in 2016 with the take-over of 100% ownership of Queenstown Rafting and the purchase of Kiwi Discovery which operated coach services and ski-field transfers.
19. In 2018, Thunder Jet and Queenstown Water Taxis Ltd were purchased increasing the Go Orange activity-based tourism offerings to include: rafting (in Queenstown and South Westland); sea kayaking (in Fiordland); cruises in Milford Sound and Doubtful Sound; jet boating, water taxis and ferries services in Queenstown. Specifically, Go Orange operates three ferries / water taxis on Lake Wakatipu. In addition, Go Orange had an extensive shuttle bus and coach fleet to service its activity-based tourism offerings.
20. In 2018 Real Journeys was restructured to be a wholly owned subsidiary of the Wayfare Group along with Cardrona Alpine Resort; Go Orange; Christchurch International Antarctic Centre; creating the largest tourism operator in the region. This business was further enlarged, when in December 2019 Cardrona Alpine Resort purchased the assets of Treble Cone and took over the DoC lease of this ski field.
21. However since coming out of lockdown in 2020, Real Journeys and Go Orange have been operating as one entity to reduce overheads and our product offerings have reduced to reflect the lack of an international market. For instance in Milford Sound, over summer 2020-21, we only operated two out of the six vessels utilised previously. Also in 2021 Go Orange assets; resource consents; and concessions have been transferred to Real Journeys and it is probable that the current Go Orange products will be amalgamated into Real Journeys.
22. Wayfare now has operational bases in Christchurch, Milford Sound, Te Anau, Manapouri, Queenstown, Wanaka, Bluff and Stewart Island. The company offers a range of quality tourism excursions including: multiday 'Discovery Expeditions' around the Southern Fiords and Stewart Island; sea kayaking, day time and overnight cruises on Milford and Doubtful Sounds (with daily coach connections to

Milford Sound from Te Anau and Queenstown); Te Anau Glow-worm Cave excursions; Stewart Island Ferries, tours (including Kiwi viewing) and accommodation on Stewart Island; in Queenstown, cruises on Lake Wakatipu aboard the “TSS Earnslaw” combined with Walter Peak High Country excursions and dining options at Colonel’s Walter Peak Homestead; skiing at Cardrona and Treble Cone; and accommodation, plus mountain biking at Cardrona; rafting, jet boating, ferry and water taxi services in Queenstown; and tours at the International Antarctic Centre.

23. Wayfare is a major tourism operator in New Zealand and has a well-earned reputation for providing high quality excursions, enjoyed by visitors from New Zealand and prior to COVID-19 visitors around the world. Real Journeys / Wayfare is one of the most successful and highly respected Tourism Companies in New Zealand. Our emphasis has always been on delivering quality high value products to enable:
- reinvestment in our business;
 - enduring as a responsible employer with high health and safety standards;
 - along with continued good environmental stewardship.
24. Each year before the borders closed due to COVID-19, the Wayfare Group hosted well over one million guests across our portfolio of businesses. However as can be seen below, COVID-19 has had a dramatic effect on our operations.

Figure 1 – Our visitor numbers for the last three years

Year	Passenger numbers		Unique visitor scans		Total
	Real Journeys	Go Orange	Cardrona	Treble Cone	
Ap 18 - Mar 19	656,629	179,199	340,459		1,176,287
Ap 19 - Mar 20	849,498	261,367	315,609		1,110,865
Ap 20 - Mar 21	267,664	34,635	235,891	70,696	608,886
Drop since COVID	67%	87%	25%		45%

25. Pre COVID-19 our Walter Peak/TSS *Earnslaw* operation equated to 31% of Real Journeys’ passengers for the year ended March 2020 which was lower than previous years as no Chinese visitors travelled to New Zealand for the 2020 Chinese New Year celebration, which is usually our busiest time of the year. In the year to April 2021 this percentage had dropped to 28% - refer table below.

Figure 2 – Percentage of Real Journeys passengers related to TSS Earnslaw & Walter Peak Operations

Year	TSS Earnslaw Cruise Only Passengers	Walter Peak Visitors	Total	Percentage of RJs overall Pax
Ap 19 - Mar 20	61,103	205,491	266,594	31%
Ap 20 - Mar 21	32,767	42,135	74,902	28%

26. Regardless of this drop, our TSS Earnslaw / Walter Peak operation is still vitally important to the success of our business as it not as affected by adverse weather events or other incidents that affect the road transport network or the 'sea'. For instance our operations in Fiordland and Rakiura are often brought to an effective standstill as weather or road accidents close access to Milford Sound and/or Doubtful Sound; or flooding closes down our Te Ana-au Caves operation; and sea conditions halt Stewart Island Ferry sailings. These interruptions occur multiple times per year.
27. Such weather disruptions rarely affect our TSS Earnslaw / Walter Peak operation, and in fact TSS Earnslaw / Walter Peak provides a back-up as a reliable high-capacity alternative venue close to central Queenstown. When access to the Fiordland coast is compromised usually by winter snow fall events, that is, when the likes of the Milford Road is closed, we transfer customer bookings to TSS Earnslaw and/ or Walter Peak.
28. The importance of our TSS Earnslaw / Walter Peak operation is reflected in the value of capital investment we have made in this area of our business, particularly since the purchase of our Walter Peak property in 2013. Specifically, the Walter Peak acquisition was \$9.5 million; TSS Earnslaw maintenance and upgrades \$2.3 million; Walter Peak capital projects (extension to Colonel's Homestead; Amphitheatre construction; Woolshed modifications; installation of a new generator shed, and new storage shed; and the provision of new staff accommodation) \$8.5 million; and \$0.5 million in Wilding Pine removal and remediation.
29. Although Real Journeys' long-established base of operations has been Fiordland, the company has an over 50-year connection with the Queenstown District and these connections have increased over the years as the company has grown and our products have diversified.
30. This is reflected in our current employment figures; with 39% of Wayfare's tourism group employees along with the Wayfare Group CE and CFO being Queenstown based, and if I add in Cardrona Alpine Resort (including Treble Cone) employees, this percentage rises to approximately 75% in the winter months.

31. The impacts of COVID-19 on the Wayfare Group have been considerable especially the tourism group: Real Journeys, Go Orange and the International Antarctic Centre. With company revenue being much poorer compared to the lowest point of the GFC. For those of us who have worked in the New Zealand tourism industry for decades, COVID-19 has been the most devastating blow we have ever experienced, impacting on our confidence and staff mental health. The ongoing uncertainty is corrosive.
32. Our coach operations along with Go Orange has been the hardest hit with Rafting and sea kayaking operations finishing up for the summer in March and the Doubtful Sound day cruises under the Go Orange brand not operating at all for the last year. Every day I can look out my Te Anau office window to see up to twelve once Queenstown based coaches, sitting there doing nothing. We have three Milford Sound day cruise vessels (all of which are surveyed to carry in excess of 300 passengers which typically undertook 3x day cruises every day in the summer) tied up and decommissioned. Two of these three vessels, mainly carried tour groups who predominately travelled to Milford Sound ex Queenstown.

Figure 3 – Unused coaches in Real Journeys Te Anau Workshop Yard



33. To right size our business to the current market, we have curtailed product offerings not only in the Queenstown Lakes District, but across our entire Fiordland operation. This has led to a reduction in our workforce right through our business. Impacting on the employment opportunities and economic wellbeing of the District as many of the staff we employed had a role tied into our Fiordland operations. For instance we employed in excess of 20 Queenstown based coach drivers pre-COVID-19 and now with only one coach on the road we only have two Queenstown based drivers.

Environmental and Social Initiatives

34. We consider that with the privilege of operating a successful tourism business in this District, comes a corresponding responsibility to be kaitiaki for our environment.

35. It is often stated in Wayfare that conservation is in our DNA. Sir Leslie Hutchins was one of the leading lights in arguably New Zealand's largest environmental crusade, the Save Manapouri Campaign. In 1994 he established the Leslie Hutchins Conservation Foundation (funded by Real Journeys) to support conservation and community initiatives in Otago and Southland.
36. Sir Leslie Hutchins legacy is upheld by the Wayfare Group as we contribute significant funds and in-kind support towards a variety of conservation projects that support habitats, recovering species and clean up initiatives, including the Cardrona Kārearea Project², Cooper Island Restoration Project³ which sees Real Journeys join the Department of Conservation's Tamatea/Dusky Sound Restoration Programme; sharing its vision to make Dusky Sound one of the most intact ecosystems in the world and a source or bio bank for the regeneration of native species.
37. Over the decades Real Journeys and now the wider Wayfare Group contribute significant funds and in-kind support towards community groups and social wellbeing programmes through the likes of Cardrona Ride Tamariki initiative which enables every child in their region to go skiing, regardless of financial barriers⁴; or Real Journeys Cruise-for-a-Cause, where we dedicate our final *Milford Mariner* and *Fiordland Navigator* overnight training cruise, as a fundraiser for a charitable or not-for-profit community organisation. Previous recipients include:
- Baskets of Blessings;
 - Wanaka Search and Rescue;
 - KidsCan Charitable Trust;
 - Cancer Society – Otago and Southland;
 - Wakatipu High School Foundation; and
 - Queenstown Family Centre.⁵
38. It is the company's economic success, ongoing growth and development that enables our organisation to contribute to our communities and our environment's overall wellbeing.
39. To reduce our environmental footprint, we work to operate within best practice guidelines. This includes regular internal environmental audits; benchmarking reviews to identify areas for improvement; and in particular, working with industry stakeholders to shift our coach and vessel fleet to alternative fuel sources such as hydrogen or battery power (EVs). All of Real Journeys' tours and attractions hold Qualmark Gold Sustainable Tourism Awards; and the Stewart Island Lodge and Walter Peak Horse treks hold Enviro Silver status.

² <https://www.cardrona.com/winter/the-cardrona-foundation/the-k%C4%81rearea-project/>

³ <https://www.realjourneys.co.nz/en/about-us/conservation/cooper-island-restoration-project/>

⁴ <https://www.cardrona.com/winter/the-cardrona-foundation/ride-tamariki/>

⁵ <https://www.realjourneys.co.nz/en/about-us/cruise-for-a-cause/>

40. Achieving better results in this sustainability space is made possible through continued growth, enhancement, and diversification of the business.

Tourism industry in Queenstown

41. Prior to the COVID-19 pandemic, Tourism was a vital contributor to New Zealand's economic and social wellbeing, generating wealth and supporting jobs in communities around the country. Tourism was New Zealand's biggest export industry, contributing 20.1% of total exports in the year ended March 2020. Specifically, tourism generated a direct annual contribution to GDP of \$16.4 billion, or 5.5%, and a further indirect contribution of \$11.3 billion, another 3.8% of New Zealand's total GDP. The annual GST paid by tourists is \$3.9 billion, including \$1.8 billion collected from international visitors. 225,384 people are directly and another 158,802 indirectly employed in tourism in New Zealand – 13.6% of the total number of people employed in New Zealand.⁶
42. The Queenstown Lakes District in particular, provided a significant contribution to the national tourism economy. Queenstown Lakes District economy was worth \$3.06 billion in 2019. The District had 41,700 residents and 30,008 jobs across 8,706 business units. The economic profile page on the QLDC website attributes 55.6% of the District economy to tourism and an additional 17.5% to accommodation and food services in 2019.⁷
43. The COVID-19 response required a temporary halt to international tourism. This, alongside the restrictions on domestic movements, has devastated the tourism sector, generally, and has also affected Wayfare Group specifically. Infometrics in an October 2020 Treasury Report are predicting that tourism-related industries are likely to suffer the biggest contractions in GDP and employment over the next two years, which is a direct reflection of the border closures and other travel limitations in place. By March 2022, GDP is forecast to be as much as 25% below (and employment 28.5%) its March 2020 level in Queenstown Lakes District, the worst affected area.⁸
44. Moreover, any increase in domestic tourism spending due to New Zealanders' inability to travel overseas will not be sufficient to offset the loss of international tourism spending. During 2019, spending by international visitors in New Zealand totalled \$15.9b, compared to \$6.7b of travel and tourism-related spending by New Zealanders overseas.⁹ Likewise, industry commentators have noted, that the reopening of the trans-Tasman bubble, is unlikely to be the panacea

⁶ <https://www.mbie.govt.nz/immigration-and-tourism/tourism-research-and-data/tourism-data-releases/tourism-and-the-economy/>

⁷ https://assets.simpleviewinc.com/simpleview/image/upload/v1/clients/queenstownnz/Visitor_Demand_Mapping_Queenstown_Lakes_421a051d-aed2-40f3-b369-8de91fd2fe81.pdf

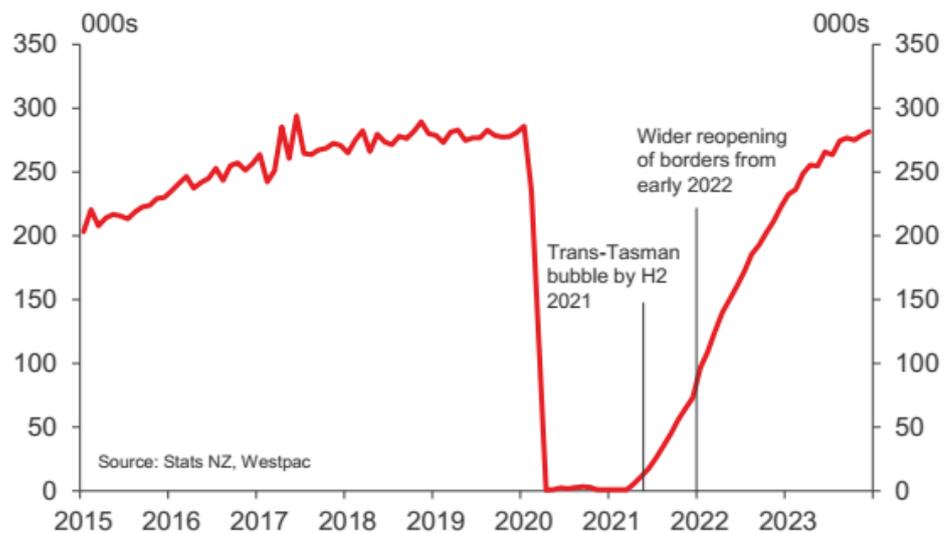
⁸ <https://www.treasury.govt.nz/sites/default/files/2021-02/effects-covid-19-regional-economies-nz-infometrics.pdf>

⁹ <https://www.treasury.govt.nz/sites/default/files/2021-02/effects-covid-19-regional-economies-nz-infometrics.pdf>

hoped for, although it will provide a much-needed boost to some of hardest hit regions that rely to a large degree on tourism.¹⁰

45. The Government has indicated that a widespread reopening of the New Zealand border will only be contemplated once a high level of immunity has been reached in the New Zealand community; which in turn depends on the speed of the vaccination rollout. Vaccines are expected to be available to the wider New Zealand public from July, which means that the desired level of vaccination coverage could be reached towards the end of the year.

Figure 4 – Westpac predictions regarding International Visitor Arrivals¹¹



46. Industry pundits are predicting that once international travel resumes, there will be a strong initial bounce back in tourist numbers, particularly from Australia; however long-haul travel is likely to see a more gradual recovery, with the return to pre-Covid levels being several years away.
47. Westpac in particular, are predicting more robust economic growth in New Zealand 2022, when international tourism starts to recover. Also the Treasury's economic forecasts predict the borders re-opening partially from mid-2021 and then opening fully from the start of 2022¹². However, they note timing around this remains uncertain; should the virus or vaccine situations change – refer figure 4 above.

¹⁰ <https://www.rnz.co.nz/news/national/440044/trans-tasman-bubble-regional-tourism-operators-cautiously-optimistic>

¹¹ <https://www.westpac.co.nz/assets/Business/economic-updates/2021/Other/Economic-Overview-Feb-2021-Westpac-NZ.pdf>

¹² <https://www2.deloitte.com/nz/en/pages/2021-government-budget/articles/budget-2021-at-a-glance.html?id=nz:2sm:3tw:4Deloitte%20NZ%20Budget%202021::6abt:20210520033634::4843904330:5%20NZ%20Budget%202021&linkId=119192297>

48. Wayfare is addressing calls to re-imagine the New Zealand Tourism Industry to a more sustainable model for the future, through redefining the company purpose with a sustainability lens. As a company we are taking active steps to move away from our reliance on fossil fuels however this is very challenging in the post COVID-19 environment when we do not have 'profits' to invest in such changes.
49. Moreover there have been appeals for nearly the last 12 months, to 're-set' the Queenstown economy, to diversify and move away from economic dependence on the Tourism Industry for the Districts success. In fact, in early May 2021, the Tourism Minister, Stuart Nash announced that a \$20 million package of Government money will be made available to Queenstown-Wanaka regional economy, to reduce its 'over-reliance' on international tourism and improve its resilience to global economic shocks.¹³
50. Despite these calls for a reset of the Queenstown economy, and a need to diversify away from tourism, I consider there will continue to be a place for tourism to grow and contribute to the social and cultural fabric of Queenstown in the future. The geographic location, the overall 'attractiveness' and the tourism product offerings in the District will continue to bring visitors to the District.
51. Tourism in the District will still be desirable, and we need a planning framework which enables tourism operators to have flexibility and options for growth and enhancement of their products offerings. Diversification of the economy does not mean no tourism, diversification can mean the addition of other alternative employment, while continuing to provide high quality tourism products. The Wayfare Group is focussed on a high quality, high value products and experiences; as this is where there is real value is for our business.
52. Due to the significant role tourism plays in the District; the contribution tourism makes to the national economy; and the ongoing impacts of COVID-19, we contend tourism opportunities should be appropriately recognised in resource management planning instruments. To promote the recovery of the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services across the District.

Conclusion

53. Our *TSS Earnslaw / Walter Peak* operation is fundamental to the success of our business as it usually equates to at least 30% of Real Journeys passenger volume and because of the uniqueness of the *TSS Earnslaw* and the attractiveness of our *Walter Peak* offerings we are able to maintain our *TSS Earnslaw / Walter Peak* operation as high value and quality products. This includes providing for additional development in Beach Bay as well as 'ashore' at *Walter Peak*. That is, the *TSS Earnslaw / Walter Peak* package provides us with a significant competitive

¹³ <https://www.odt.co.nz/business/200m-support-package-struggling-tour-operators>
2002077 | 6051649v1

- advantage both in terms of its proximity to Queenstown and the value proposition which enables Real Journeys to maintain premium pricing for these products.
54. In comparison pre-COVID-19, we faced stiff competition in Milford Sound, and we had to fight hard for our market share with the likes of some of the tour group business transferring to other operators for a cheaper price; eroding the worth of the Milford Sound 'experience'.
55. The profitability of our businesses enables Wayfare Group to be a good 'corporate citizen' and thereby:
- contributing extensively to conservation initiatives and social wellbeing programmes;
 - being an employer of choice who invests in its employees;
 - investing in improving our assets and infrastructure;
 - maintaining very high health and safety standards;
 - adopting new technology; and
 - developing new products to address changing visitor expectations.
56. Since becoming the land owner of the 155-hectare land parcel at Walter Peak, we have invested hundreds of thousands of dollars to address changing visitor expectations, improving the site through:
- Clearing thousands of wilding pines and commencing native replanting;
 - Extensive landscaping including developing and maintaining the Beach Point picnic area;
 - Enlarging the dining capacity of the Colonel's Homestead;
 - Constructing a new rural demonstration facility; a new storage facility; a new generator shed; and more onsite staff accommodation.
57. These developments were enabled by the ongoing operation of high quality and value *TSS Earnslaw* / Walter Peak products. Hence a planning framework that provides certainty, and for the continual requirement to develop new products in response to changing tourism trends and visitor requirements is essential to Wayfare. Accordingly, I request that the commissioners do not degrade the Walter Peak and Beach Bay development opportunities through a constraining planning framework which will in effect devalue our land at Walter Peak.
58. The need and ability to utilise our land over time for high quality and / low environmental impact tourism activities, should be allowed for. Development, done correctly by a company like the Wayfare Group, will only improve the local region, economically and also increase the recognition of Queenstown and New Zealand as a high-quality tourism destination.

Paul Norris

Dated this 28th day of May 2021