BEFORE THE SOUTHLAND REGIONAL COUNCIL

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	an application for resource consent to operate a commercial surface water activity within the coastal waters of Fiordland/Te Mimi o Tū Te Rakiwhānoa.
BY	**SEÁN LIAM ELLIS AND MARIA KUSTER** Applicants

BRIEF OF EVIDENCE OF STEPHEN SKELTON

November 3rd 2026

INTRODUCTION

1. My full name is Stephen Russell Skelton. I am a Registered Landscape Architect and the Director of Patch Limited (Patch), a landscape architecture consultancy based in Queenstown.

2. I hold the qualifications of a Bachelor of Arts in Communication from Northern Arizona University and a Master of Landscape Architecture (First Class Honours) from Lincoln University. I have been a registered member of Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA) since 2015.

3. I have been involved in landscape consultancy work for over 13 years, working in both the public and private sectors, primarily in the Queenstown Lakes and Central Otago districts. I previously held the position of Landscape Planner with Lakes Environmental before it was absorbed by the Queenstown Lakes District Council, and subsequently the position of Landscape Architect at another Queenstown practice. I founded Patch in 2016. My work includes landscape assessment, expert evidence, and landscape planning for resource consent applications and plan processes. Of particular relevance to this application, I prepared the landscape assessments for the RealNZ coastal permit applications in Patea/Doubtful Sound, including APP-20221882, which involved an increase in vessel length from 30m to 36m, and I have undertaken field work on the water in the Fiordland coastal marine area in connection with that work.

4. I prepared the Landscape and Visual Effects Assessment for this application, issued on 29 September 2026 as V2 Application (my Assessment). It was reviewed by Jessica Zuban of Patch. All site observations, professional judgements, analysis, and conclusions in the Assessment are my own, and I have checked and verified its content. I adopt the Assessment in full as my own work and professional opinion.

CODE OF CONDUCT

5. Although this is a council hearing, I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and agree to comply with it. Except where I state that I rely on the evidence of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

SCOPE OF EVIDENCE

6. My evidence covers:

   (a) my methodology, including the site visit;

   (b) the receiving landscape, including its wilderness and remoteness values;

   (c) the proposal and the consented baseline;

   (d) the effects of the proposal on landscape and natural character, visual amenity, and the cumulative effects;

   (e) the landscape-related provisions of the New Zealand Coastal Policy Statement 2010 (**NZCPS**) and the Regional Coastal Plan for Southland 2013 as amended by Plan Change 5 (**RCP**);

(f) the section 42A report and submissions, so far as they relate to landscape matters; and

(g) conditions.

SUMMARY OF EVIDENCE

7. Seán Ellis and Maria Kuster (**the applicants**), who trade as Pure Salt, seek a coastal permit to operate MV *Wakakura*, a 27 m vessel, for commercial surface water activities in the coastal waters of Fiordland between Yates Point and Puysegur Point. The vessel would carry up to 17 people including crew, on up to 300 days a year, with two tenders, eight kayaks and four paddleboards. The applicants propose to surrender their existing coastal permit for a 17 m vessel (AUTH-20202563) before exercising the new consent.

8. The receiving landscape is of the highest natural character on the New Zealand coast. It is also a landscape of immense scale, in which transient vessel activity is an established and characteristic element. The change I have assessed is the substitution of a 27 m vessel for a consented 17 m vessel of the same type, with no change to passenger numbers, frequency or area of operation.

9. In my opinion, the adverse landscape, natural character and visual amenity effects of the proposal will be very low, which can be characterised as less than minor. The proposal is consistent with the landscape-related provisions of the NZCPS and the RCP.

METHODOLOGY

10. I undertook my assessment in accordance with the principles in *Te Tangi a te Manu: Aotearoa New Zealand Landscape* Assessment Guidelines (**the Guidelines**)[1], the NZCPS and the RCP. I applied the consented baseline established by AUTH-20202563 and assessed the incremental effects of the proposal against that baseline.

11. I rated effects on the seven-point scale in the Guidelines: very low, low, low-moderate, moderate, moderate-high, high and very high. Consistent with the Guidelines, an effect of moderate or above can be characterised as more than minor; low and low-moderate effects as minor; and very low or low effects as less than minor.

12. Site access in this part of Fiordland is by sea or air only and is heavily weather dependent. I attempted to visit the site on several occasions. This included travelling to Te Anau and waiting out cloud cover that never cleared, with helicopter access from Manapōuri unavailable for the duration of my stay. Further attempts to coordinate access with vessel changeover days were also frustrated by weather.

13. On 8 September 2026, I undertook a site visit in fine, clear conditions. I flew by helicopter from Manapōuri to MV Flightless, which was anchored in Vancouver Arm, Te Puaitaha/Breaksea Sound. On the flight in I observed a private craft on the water in Hall Arm, Patea/Doubtful Sound, which provided a useful reference for the scale and visibility of smaller vessels within the fiords. I spent approximately one and a half hours at Vancouver Arm, during which I:

(a) viewed the vessel at anchor and its tender craft operating on the water;

[1] NZILA. Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines. July 2022.

(b) flew a drone to observe the vessel in the context of the wider fiord landscape, including from elevated positions and at a range of distances; and

(c) observed the movement of the helicopter to and from the vessel.

14. Because MV Wakakura will be identical to MV Flightless in dimensions and form, viewing MV Flightless at anchor in the receiving environment provided a direct and accurate understanding of how the proposed vessel will appear and be experienced in the landscape. Images from the site visit are used as figures in my Assessment.

15. In addition to the site visit, my assessment draws on my previous field work in the Fiordland coastal marine area described at paragraph 3, during which I observed commercial vessels of a range of sizes operating within the fiords, including the 103m National Geographic Orion, and viewed vessels from tender craft to understand their scale, visibility, and context; photographs, video, and drone footage of MV Flightless operating in Tamatea/Dusky Sound and Te Puaitaha/Breaksea Sound, supplied by Pure Salt and from publicly available sources; topographic mapping, nautical charts, and aerial imagery of the Fiordland coast between Yates Point and Puysegur Point; the Regional Coastal Plan Landscape Assessment (2013); and the description of the affected environment in the application documents.

16. The Guidelines recognise that landscape assessment relies on familiarity with the landscape and on the assessor's reasoned judgement. The site visit, together with my previous field work in Fiordland and the material described above, has given me a sound understanding of the receiving landscape, the appearance and scale of the vessel within it, and the nature of the ancillary and associated activities. I am confident my assessment is made on a robust basis.

THE RECEIVING LANDSCAPE

17. The consent area covers the coastal marine waters of Fiordland between Yates Point and Puysegur Point. The coastline is a sequence of glacially carved fiords: long, narrow, deeply enclosed arms of the sea with steep rock walls, hanging valleys and numerous waterfalls. The adjoining land is Fiordland National Park, part of Te Wāhipounamu – South West New Zealand World Heritage Area. The Regional Coastal Plan Landscape Assessment gives every fiord other than Milford Sound/Piopiotahi a naturalness rating of 5, the highest level.

18. Pure Salt's operations are focused on Tamatea/Dusky Sound and Te Puaitaha/Breaksea Sound and their surrounds, including Wet Jacket Arm, Acheron Passage and the waters around Mauikatau/Resolution Island. In Patea/Doubtful Sound, operations are limited to picking up and dropping off passengers, fuel and supplies. I have therefore focused on the Tamatea/Dusky Sound complex, where the proposal will be experienced most often.

19. Physically, Tamatea/Dusky Sound is the largest and most complex of the fiords. It extends about 40 km inland and is up to about 8 km wide. It is a drowned glacial trough whose walls rise steeply from the water, cloaked in near-continuous beech and podocarp forest and broken by bluffs, slips and waterfalls that respond within hours to very high rainfall. Mauikatau/Resolution Island encloses the seaward side of the fiord, and Acheron Passage connects it to Te Puaitaha/Breaksea Sound to the north.

20. Unlike the single channel of Milford Sound/Piopiotahi, the inner waters of Tamatea/Dusky Sound form an intricate archipelago. Large islands, including Pukenui/Anchor Island, Māmaku/Indian Island, Long Island and Ao-ata-te-pō/Cooper

Island, lie among hundreds of smaller islands, islets and reefs. The result is a layered sequence of channels and sheltered coves, including Luncheon Cove, Pickersgill Harbour, Cascade Cove, Shark Cove and Supper Cove. This complexity of composition is not experienced elsewhere on this coast.

21. High rainfall produces a tannin-stained, low-salinity surface layer over denser seawater, which supports black corals and sponges at unusually shallow depths. Frequent low cloud, mist and rapidly changing weather are defining attributes of the fiord.

22. The fiords hold deep significance for Ngāi Tahu. In tradition they were shaped by Tū Te Rakiwhānoa to make the coast habitable, and Tamatea takes its name from the captain of the waka Takitimu. The fiord retains a dense network of place names, tauranga waka, and wāhi tapu, and the area is subject to a Statutory Acknowledgement for Te Mimi o Tū Te Rakiwhānoa.[2] Effects on cultural values are outside the scope of my evidence and are addressed in the application documents. However, this associative dimension forms part of my description of the landscape.

23. Tamatea/Dusky Sound also holds a concentration of early European heritage, including Captain Cook's stay in 1773 at Pickersgill Harbour and the site of the first European vessel built in New Zealand at Luncheon Cove. From the 1890s Richard Henry's work on Resolution Island made the fiord the birthplace of island conservation in New Zealand, a legacy continued today through predator control and species translocations to which Pure Salt contributes.

24. Recreational and tourism use of the fiord is longstanding but low in intensity. There is no road access; visitors arrive by sea, by air or on foot via the Dusky Track. Charter vessels, fishing vessels, hunters, divers and kayakers all use the fiord, and that activity, together with the small number of moorings and Department of Conservation facilities, forms part of its existing character.

25. The defining perceptual attributes of the area are remoteness, wildness, natural quiet and immense scale. Vessels read as small, transient elements against towering landform and forest, and leave little or no lasting trace. Because its natural patterns are so intact, the landscape is highly sensitive to permanent modification or intensified use. In my opinion its capacity to absorb transient, water-based activity of an established type is high, while its capacity to absorb structures or a materially greater intensity of use is low.

26. My description of these values is consistent with the work commissioned by Environment Southland to inform Plan Change 5. Dr Kay Booth's study of the wilderness and remoteness values of Fiordland waters[3] found that wilderness value in the fiords is most commonly defined by the absence of people and human modification, and comprises the elements of remoteness, naturalness, minimal human presence, natural quiet, aesthetic appreciation, conservation-related activity, personal experience, and scale, the last reflecting the large size of Fiordland and the steep-sided nature of the fiord landscape. These elements align closely with the perceptual attributes I have described, and I have had regard to them in my assessment. Dr Booth also observed that, unlike terrestrial wilderness, access to the fiords requires motorised transport, most often provided by commercial operators, and that the people she

[2]Ngāi Tahu Claims Settlement Act 1998, Schedule 102: Statutory Acknowledgement for Te Mimi o Tū Te Rakiwhānoa (Fiordland Coastal Marine Area).

[3]Booth, K. (2022). Wilderness and Remoteness Values of Fiordland Waters. Prepared for Environment Southland Te Taiao Tonga by Lindis Consulting, 22 February 2022. Appendix to the Plan Change 5 section 42A hearing report.

interviewed voiced the need for a balance between protecting wilderness value and enabling people to visit Fiordland.

27. The Fiordland coastal marine area accommodates an established pattern of commercial and recreational surface water activity. The schedule of current consents (July 2024) records authorised vessels from 6 m water taxis to a 49 m vessel, with several vessels of 30 m to 44 m authorised to operate on this coast. The applicants already operate the 27 m MV *Flightless* in these waters under a separate coastal permit (AUTH-20181624-02).

28. Helicopter access is also an established feature of the fiords, used for passenger transfer, crew changeover, and the servicing of remote operations. During my site visit I observed helicopter movements to and from the vessel at Vancouver Arm. These movements are brief and infrequent, and once complete the natural quiet of the setting quickly reasserts itself.

THE PROPOSAL AND THE CONSENTED BASELINE

29. MV *Wakakura* is the sister ship of MV Flightless. It is a converted former New Zealand Navy vessel, 27m long with a 6.1m beam and 2.4m draft, with a steel hull. The vessel is being refitted, and on completion will be identical to MV Flightless in dimensions, form, profile, and colours, being a dark hull with an off-white superstructure. I address the appearance of the vessel in the landscape in my assessment of effects below.

30. The applicants propose a condition requiring the surrender of AUTH-20202563 before the new consent is exercised. The consented baseline is therefore a 17 m vessel carrying up to 17 people including crew, with ancillary craft in practical use, operating across the same area on no more than 300 days in any calendar year, and with access to Patea/Doubtful Sound limited to 35 nights a year (no more than five in any month) for passenger transfers and resupply.

31. The changes I have assessed are:

    (a) the increase in vessel length from 17 m to 27 m, with associated increases in beam and overall bulk; and

    (b) the express authorisation on the face of the consent of two tenders, eight kayaks and four paddleboards.

32. There is no change to passenger numbers, frequency of operation, area of operation or the nature of the activities. No new structures, moorings or anchorages are proposed. The applicants hold a separate consent (AUTH-20211363) for three existing swing moorings at Cascade Cove, Shark Cove and Vancouver Arm, and will continue to use recognised anchorages.

33. I correct one point in my Assessment. It described the proposal as operating on up to 365 days a year. That figure came from the original 2021 application. The amended application of 10 June 2026 reduced it to 300 days a year, in line with the consented baseline under AUTH-20202563. I have considered whether this changes my

conclusions. It does not, except to confirm that the frequency of the activity does not change from the consented baseline.

LANDSCAPE AND NATURAL CHARACTER EFFECTS

34. The proposal involves no modification to landform, vegetation or the coastal edge, introduces no structures, and does not alter the patterns or processes of the fiord landscape. The physical attributes of the landscape will be unchanged.

35. The question is whether the larger vessel, moving through and anchoring within the fiords, will diminish natural character and landscape values to a greater degree than the consented 17 m vessel. In my opinion it will not, to any material degree, because:

    (a) the receiving landscape is vast. Within walls rising hundreds of metres from the water, a 27 m vessel, like a 17 m vessel, occupies a very small part of any view and is dwarfed by the scale and complexity of the fiord;

    (b) vessel-based activity is an established and expected attribute of this coast, and a 27 m vessel sits comfortably within the range of vessels already authorised in the southern fiords;

    (c) the vessel's presence is transient. It moves through the landscape, anchors overnight in sheltered coves and leaves no trace;

    (d) MV *Wakakura* will be identical in form and colour to MV *Flightless*, which already operates in these waters. Its dark hull recedes against the dark tones of forest and water, while the off-white superstructure, the smaller component of the vessel, typically reads against the water surface in the manner of the many pale topped vessels that use this coast. During my site visit I observed MV *Flightless* at anchor, where it read as a small, contained and familiar element within the fiord. Observers will not perceive a new or unfamiliar element; and

    (e) with the surrender of AUTH-20202563 there will be no additional vessel in the fiords. The proposal substitutes one authorised vessel for another.

36. In reaching that view I have placed limited weight on the average consented vessel length of 26m recorded in the application, because that average is heavily weighted by the large day vessels in Milford Sound/Piopiotahi, a different receiving environment from the southern fiords. I rely instead on the vessels authorised to operate in the southern fiords themselves, including the 30m Milford Wanderer, which operates multi-day expedition cruises through Te Puaitaha/Breaksea Sound, Acheron Passage, Tamatea/Dusky Sound, and Preservation Inlet with tender craft and kayak activities of the same kind proposed here, together with other authorised expedition vessels of 30m and larger. Substantially larger cruise vessels, including the 103m National Geographic Orion, also transit the southern fiords. In that company, a 27m vessel is unremarkable in scale and entirely characteristic of the established pattern of use.

37. My conclusion is also consistent with Dr Booth's advice to the Council during Plan Change 5. Dr Booth advised that more boat activity is the primary causal factor in the erosion of wilderness values, and that increased vessel size is a secondary factor or driver, because larger boats are more visible and have more ancillary activity.[4] The

[4]Booth, K. (2022). Memo to Environment Southland: Plan Change 5: Surface water activities in the Southland Regional Coastal Plan. Response to points raised in submissions about recreation. 5 December 2022. Appendix D to the Plan Change 5 section 42A hearing report.

proposal does not increase boat activity: the number of vessels, the number of passengers, the frequency of operation, and the area of operation are all unchanged from the consented baseline, and the ancillary activity would be fixed on the face of the consent. The secondary factor, vessel size, changes by 10m on a single vessel that will be identical in appearance to a vessel already operating in these waters. Assessed against the matters Dr Booth identifies, the proposal does not engage the primary driver of effects on wilderness values, and engages the secondary driver to a degree that, in the context of the scale of the receiving landscape, is in my opinion very low.

38. Set against the highest-order natural character of this coast, I consider the increase in vessel length will have no more than very low adverse effects on natural and landscape character.

VISUAL EFFECTS

39. The audiences for the proposal are few and are themselves on the water or at the water's edge: passengers and crew of other vessels, recreational boaties and fishers, kayakers, divers, hunters, trampers at the coastal ends of the Dusky Track (including Supper Cove), and Department of Conservation staff working on the islands. There are no roads, settlements or fixed public viewpoints. All views of the vessel are transient, and viewers are typically moving.

40. In near views, such as a shared anchorage or a passing encounter in a channel, the 27m vessel will read as recognisably larger than the consented 17m vessel. During my site visit I viewed MV Flightless at anchor in Vancouver Arm from the water and from the air. Even in near views, the vessel occupied a very small proportion of the visual field, contained low against the water and enclosed by forested walls rising steeply on all sides. Drone imagery taken during the visit (Figures 3 and 4 of my Assessment and reproduced here as **Figures 1 and 2**) shows the vessel within the wider fiord context, where the difference between a 17m and a 27m hull is not readily discernible against the scale of the enclosing landform. The vessel will be seen as a familiar type in an expected location, in coves that already accommodate vessels of similar and larger size.

41. The flexible, weather-driven pattern of the operation disperses activity over a very large area rather than concentrating it at particular sites, so encounters will be occasional and brief. For trampers and hunters ashore, an expedition vessel at anchor is an established part of the experience of this coast and, for many, the means of their own access.

42. Overall, I consider the proposal will have no more than very low adverse visual effects, and visual amenity within the fiords will be maintained.



Figures 1 and 2: The MV Flightless in Vancouver Arm looking west (above) and east (below).



ANCILLARY CRAFT

43. I correct my Assessment on one point concerning the ancillary craft. The Assessment stated that the two tenders, eight kayaks, and four paddleboards were included in the

original application for AUTH-20202563. That is not accurate. The 2020 application for that consent described one tender, a 3.5m outboard-powered Stabicraft. The consent itself does not list ancillary craft, although its biosecurity condition (condition 9) applies to tender vessels and kayaks, and I understand from Ms Horwell that tenders used as an ancillary part of a consented operation were not themselves required to be separately consented under the previous framework.

44. The position for the present application is clear: the two tenders, eight kayaks, and four paddleboards have formed part of the proposal since at least July 2021, when the Department of Conservation gave its written approval on the basis of agreed conditions that list them. Compared with the baseline, the proposal therefore authorises one additional tender and specifies the numbers of kayaks and paddleboards on the face of the consent. My assessment below takes that into account, and it does not change my conclusions.

45. The ancillary craft are small and low to the water. They operate close to the main vessel, for short periods, and only while it is present in a location. During my site visit I observed the tender craft operating adjacent to MV Flightless; they read as small, low elements, subordinate to the main vessel and visible only at close range. Kayaks and paddleboards are non-motorised, near silent, and an entirely characteristic way of experiencing the fiords. The tenders are indistinguishable from recreational craft already on this coast. I note that the Fiordland Marine Guardians observed, in a further submission on Plan Change 5, that larger vessels tend to be accompanied by more ancillary activity. Here, the ancillary activity would be fixed on the face of the consent and operates only in association with the main vessel. I assess the landscape and visual effects of the ancillary craft as very low.

CUMULATIVE EFFECTS

46. From a landscape perspective, the question is whether the proposal adds to the overall presence, intensity or perceived level of vessel activity in the fiords. In my opinion it does not. With the surrender of AUTH-20202563, the number of vessels the applicants are authorised to operate does not change, and passenger numbers, days and area of operation are unchanged. Because MV *Wakakura* will be identical in appearance to MV *Flightless*, the perceived level of activity will not materially change. The proposal will not contribute to any cumulative erosion of the wilderness, remoteness or natural quiet values of the Fiordland coastal marine area.

STATUTORY PROVISIONS

47. I address only the landscape-related provisions. The wider planning framework, including activity status, is addressed by Ms Horwell.

48. NZCPS Policy 13 seeks to preserve natural character, including by avoiding adverse effects on natural character in areas of outstanding natural character. Policy 15 seeks to protect natural features and natural landscapes from inappropriate use and development. The Fiordland coast is of the highest order in both respects. For the reasons I have given, the proposal will have no more than very low adverse effects on natural character and will not compromise the natural features and landscapes of the coast. It maintains an existing, authorised and characteristic activity at the same intensity. In my opinion it is consistent with Policies 13 and 15.

49. RCP Objectives 16.1.1 to 16.1.3 seek to maintain the essential characteristics of the Fiordland coastal marine area, preserve its remoteness and wilderness values, and manage the effects of surface water activities on its intrinsic values. The proposal

maintains the consented level of activity and involves no additional vessel. Natural character, remoteness, tranquillity and landscape values will remain unchanged.

50. RCP Policy 16.2.8 identifies matters that can affect the wilderness and remoteness values of the Fiordland coastal environment. Of those relevant to landscape:

    (a) ship size (clause 1): the increase from 17 m to 27 m does not intensify effects on wilderness and remoteness values, and passenger numbers and frequency are unchanged;

    (b) vessel appearance, including scale, bulk and form (clause 3): MV *Wakakura* will be identical in appearance to MV *Flightless*, and the increase in length will be absorbed within the scale of the landscape;

    (c) ancillary activity (clause 5): the ancillary craft reflect the established operation;

    (d) location, landform and scale, including ability to absorb change (clause 6): the scale of the fiords is such that the change in vessel length will be negligible; and

    (e) anthropogenic noise (clause 7): I understand from Ms Kuster that a wet exhaust system is proposed for the MV *Wakakura*, which I understand reduces engine noise at the water surface. If so, that is positive for natural quiet, a key perceptual attribute of the setting. I do not give expert evidence on noise.

51. RCP Policies 16.2.1, 16.2.2 and 16.2.7 direct the protection of natural character, landscape, amenity, wilderness and remoteness values, including avoiding adverse effects on internationally, nationally and regionally significant values. For the reasons I have given, the proposal maintains those values. Given the consented baseline and the surrender condition, I do not consider it a new or intensifying activity in landscape terms.

SECTION 42A REPORT

52. The section 42A report of Mr Ryan Hodgson recommends that the application be granted subject to conditions. No peer review of my Assessment was commissioned.

53. Mr Hodgson addresses natural character, landscape, remoteness and wilderness values at sections 3.3.25 to 3.3.31 of his report, and accepts my assessment and conclusions at 3.3.31 and 4.1.5. His analysis follows the same approach as mine: the assessment is properly confined to the differences between the consented baseline and the proposal (3.3.3 and 3.3.26); the larger vessel will marginally increase the vessel's visual scale against the steep fiord backdrop but is not dissimilar to other commercial vessels operating in the area (3.3.27); the additional tender craft will have no more than minor effects (3.3.29); and with the surrender of AUTH-20202563 there will be no cumulative pressure on the fiords (3.3.32 and 3.3.33). I agree with his analysis and conclusions.

54. At 3.3.9 Mr Hodgson describes the 27m vessel as slightly above the average size (26m) of consented vessels in the Fiordland coastal marine area, and at 3.10.8 as the approximate average size. As set out earlier in my evidence, I place limited weight on that average because it is heavily influenced by the large day vessels operating in Milford Sound/Piopiotahi. My conclusion does not depend on the average: a 27m vessel sits comfortably within the range of vessels authorised to operate in the southern fiords, and Mr Hodgson's conclusion holds on either approach.

55. Mr Hodgson places some weight on the colour of the vessel, noting at 3.3.28, 3.9.2 and 4.1.4 that the dark hull of MV *Wakakura* will blend with the Fiordland backdrop better than the white hull of the vessel authorised under AUTH-20202563. I agree that the dark hull is recessive against the forested fiord walls, and for completeness I record that the superstructure is off-white, as shown in the figures to my evidence. My assessment does not rely on the colour scheme being an improvement on the baseline. It relies on the vessel being identical to MV Flightless, so that no new or unfamiliar element enters the landscape, and on the scale of the receiving environment.

56. At 3.10.8 Mr Hodgson interprets Policy 16.2.2 strictly and describes the proposal as slightly intensifying the commercial surface water activity, with net effects on the significant values of the Fiordland coastal environment that are, in his words, somewhat negligible and sufficiently mitigated. From a landscape perspective I would put the point more directly. The only change with any capacity to affect the values identified in Policy 16.2.2(1) is the length of a single vessel, and for the reasons given in my evidence that change will not increase adverse effects on natural character, landscape, amenity, wilderness, remoteness or tranquillity values.

57. On that basis the proposal is not one where adverse effects on those matters will increase.

SUBMISSIONS

58. Two submissions were received, from the Fiordland Marine Guardians (FMG) and from Te Ao Mārama Inc on behalf of Te Rūnanga o Ōraka-Aparima. Both were lodged in August 2021 in response to the original application and predate the amended application of 10 June 2026, which responded directly to the concerns raised. I address the landscape, natural character, wilderness and remoteness themes below. Cultural matters, including effects on mauri and the assessment of Te Tangi a Tauira, are addressed by Ms Horwell.

59. The central concern in both submissions was that the proposal, as originally applied for, would have added a vessel to the Fiordland coastal marine area. The amended application answers that concern: with the surrender of AUTH-20202563 there will be no additional vessel, no additional passengers, and no change to the frequency or area of operation. The premise of the cumulative effects concern no longer applies, as Mr Hodgson records at 3.3.32 and 4.1.3 of his report.

60. FMG submit that operation for up to 365 days a year, with trips of up to two months, is not transitory and would place near constant pressure on the fiords. The amended application and draft condition 5 limit the activity to 300 days a year, the same as the consented baseline, so the proposal does not extend the operating year at all. Further, the operation is dispersed across a very large area between Yates Point and Puysegur Point, so the vessel's presence in any one location is occasional and brief. The duration of the consented presence in the fiords does not change.

61. FMG characterise as 'preposterous' the proposition that an identical vessel will result in less impact, suggesting the same logic could justify doubling every vessel in Fiordland with a sister ship. That is not my reasoning. I do not claim the larger vessel has less impact because it is identical to MV *Flightless*. The identity point is narrower: observers will not perceive a new or unfamiliar element in the landscape. The absence of cumulative effect arises from the surrender of AUTH-20202563, not from the vessels' similarity. A sister ship added without a surrender would be an additional vessel, and my assessment of its cumulative effects would be different.

62. FMG submit that remoteness values in the southern fiords have eroded over time through charter activity. Dr Booth's work for Plan Change 5 records the same concern and identifies more boat activity as the primary driver of effects on wilderness values. I accept that vessel numbers and encounters are the matters to watch in this landscape. That is precisely why the surrender condition matters: this proposal adds nothing to vessel numbers, passenger numbers or days of operation, and so makes no contribution to the trend FMG describe.

63. Both submitters express a general position that applications should not be supported until better information on cumulative effects and carrying capacity is available through the Regional Coastal Plan review. The allocation question is a planning matter beyond the scope of my evidence. In landscape terms, however, the information needed to assess this proposal is available, because the change is confined to the length of one vessel and one additional tender, measured against a defined consented baseline, and I have assessed exactly that.

CONDITIONS

64. My conclusions depend on the proposed condition requiring the surrender of AUTH-20202563 before the new consent is exercised. Without it, the proposal would add a vessel to the fiords and my assessment of cumulative effects would be different. They also depend on the new consent carrying over the 300-day annual limit and the Patea/Doubtful Sound restrictions. I understand the applicants have proposed conditions based principally on those of AUTH-20202563, updated to reflect the larger vessel and ancillary craft. Proposed conditions 1, 2, 3 and 5 secure these matters, and I support them.

65. I support the ancillary craft being specified on the face of the consent as draft condition 2 provides (two tenders, eight kayaks and four paddleboards), and the number of people carried being limited to 17 including crew. I note that although the colour of the vessel is given weight in the section 42A assessment, no condition secures it. Should the Panel consider it necessary, a condition requiring the vessel to be finished in the same colour scheme as MV Flightless would be straightforward to comply with and consistent with the basis of my assessment.

CONCLUSION

66. The proposal substitutes a 27 m vessel for a consented 17 m vessel in the Fiordland coastal marine area, with no change to passenger numbers, frequency or area of operation, and with the existing 17 m permit to be surrendered. The receiving landscape is of the highest natural character, but is of immense scale, and transient vessel activity is an established and characteristic part of it.

67. In my opinion, the adverse landscape, natural character and visual amenity effects of the proposal, including the ancillary craft, will be very low, which can be characterised as less than minor. With the surrender of the existing permit, the proposal makes no cumulative contribution to vessel presence, and the wilderness, remoteness and natural quiet values of Te Mimi o Tū Te Rakiwhānoa will be maintained. The proposal is consistent with the landscape-related provisions of the NZCPS and the RCP, including Plan Change 5.

Stephen Skelton

3 November 2026