

29 October 2020

Stephen West
Environment Southland
Private Bag 90116
Invercargill 9840

Dear Steve,

APP-20202433- Application for a coastal permit – Offspring Travel Ltd (OTL)

In response to the matters that you seek further information on in your email dated 12 October 2020, I can advise as follows:

1. *Vessel design information (including diagrams) for the proposed support vessel. I am requesting this information so that the navigational safety aspects of the proposal can be assessed by our Harbourmaster.*

The applicant has advised that the vessel will be very similar to the *Southern Secret* vessel that it operates under this consent at present. Due to economic reasons, they are unable to commit to the purchase of a new vessel at the current time but intend to do so in the future.

Attached are indicative plans of the type of vessel they would like purchase to use as a safety vessel for the kayaking operation, which would not be out of place in this environment. The vessel needs to be large enough to transport the kayaks and kayakers, and provide room for catering for lunches. It needs to be suitable for conditions in the Sound and be able to quickly embark the kayakers if conditions change. The plans also show accommodation facilities, which are not required for this activity but it would enable the vessel to provide a back-up for backcountry trips if required.

Please note, the proposed vessel will only be a single engine, not a twin engine as shown in the attached plans.

2. *Plans showing the approximate routes of the various tours, in particular the location of Ponytail Falls and Lucky Burn. I am requesting this information because, while these may be known landmarks, they are not apparent on some topographical maps of the area nor are they features marked in plans on the area in the Coastal Plan.*

Please find attached a map showing various locations that are referred to in the application and following trip information for your reference.

Below is a table outlining the various trip options. Each trip option is determined by a number of different factors with the main driver being weather conditions.

Day Trips	
Option 1	<p>Kayaking clients commence trip from the OTL wharf located in Deep Cove. Mooring of vessel at Commander Peak with kayaking clients lunching on vessel.</p> <p>Clients continue kayaking to the south end of Hall Arm.</p> <p>Clients and kayaks loaded on vessel and transported back to OTL wharf at Deep Cove.</p>
Option 2	<p>Kayaking clients commence trip from the OTL wharf located in Deep Cove. Mooring of vessel at Commander Peak with kayaking clients lunching on vessel.</p> <p>Clients continue kayaking to Secret Cove.</p> <p>Clients and kayaks loaded on vessel and transported back to OTL wharf at Deep Cove</p>
Option 3	<p>Kayaking clients commence trip from the northern end of Crooked Arm. Lunch on vessel at Lucky Burn in Crooked Arm.</p> <p>Clients continue kayaking to Turn Point, Crooked Arm.</p> <p>Clients and kayaks loaded on vessel and transported back to OTL wharf at Deep Cove</p>
Option 4	<p>Kayaking clients commence trip from the Shelter Islands. Mooring of vessel and lunch at Blanket Bay.</p> <p>Clients continue kayaking along the south side of Thompson Sound next to Secretary Island, opposite Deas Cove.</p> <p>Clients and kayaks loaded on vessel and transported back to OTL wharf at Deep Cove.</p>
Overnight Trips	
Option 1	<p><u>Day 1</u></p> <p>Kayaking clients commence trip from the OTL wharf located in Deep Cove. Mooring of vessel at Commander Peak with kayaking clients lunching on vessel.</p> <p>Clients continue kayaking to the south end of Hall Arm returning to Ponytail Falls campsite to overnight.</p> <p><u>Day 2</u></p> <p>Commence from Ponytail Falls Campsite returning to OTL wharf in Deep Cove.</p>
Option 2	<p><u>Day 1</u></p> <p>Travel by vessel from OTL wharf at Deep Cove to Secret Cove.</p> <p>Commence kayaking trip from Secret Cove.</p> <p>Lunch on vessel next to Lucky Burn in Crooked Arm.</p>

	Kayak down Crooked Arm to Turn Point. Return to Lucky Burn campsite to overnight. <u>Day 2</u> Commence from Lucky Burn campsite kayaking to Blanket Bay. Lunch on vessel at Blanket Bay. Clients and kayaks loaded on vessel and transported back to OTL wharf at Deep Cove.
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- An assessment of the effects at the points of embarkation and disembarkation, particularly whether there is a crowding effect cumulatively with other visitors at those points. I have asked about this because of reports of this as an issue in the March-May period when more vessels were allowed to operate in Doubtful Sound in response to the closure of the Milford Road. I wish to understand if it is an issue under more typical conditions.*

Offspring Travel Ltd has chosen to cater for smaller groups of visitors and provide a more personalised experience, something that the larger operator in this area is unable to provide. In order to provide the best experience for their visitors and maintain the feeling of remoteness in areas of significant infrastructure within West Arm and Deep Cove, it intentionally plans its trips to avoid these areas at the same time as larger companies to reduce excessive crowding.

OTL operate its own wharf and vessels at Manapouri for crossing the lake from Manapouri to West Arm. It also has its own busses for travel over the Wilmot Pass. The company utilises the Meridian Wharf at West Arm for embarkation and disembarking, and then immediately places the vessel on their mooring line away from the wharf. OTL also has its own wharf in Deep Cove that is solely used for its kayaking operation and the berthing of the safety vessel, which means any congestion around the use of the Deep Cove Meridian wharf is avoided. The company operates its trips outside the scheduled times of larger operator’s vessel movements in these areas to ensure all of its visitors get the best experience possible and avoid congestion at Deep Cove.

- Evidence to back-up the assessment that the cumulative effects, particularly on wilderness and remoteness values, will be no more than minor. I recognize that this is difficult to assess, but the level of allocation means that the activity is a non-complying activity. One option, where the proposal will not increase day trip numbers, is to check how the current level was decided. However, a better method, and one that is necessary for the additional back-country trips, is to carry out assessment of physical factors, such as cumulative noise effects and the number of vessels visible in the area, and assessment of visitor perceptions wilderness and remoteness values. I note that this is a growing problem for applicants, and it may be possible for a group approach amongst the consent holders to surveying visitor perceptions.*

The proposed activity is non-complying due to the total number of commercial day trips undertaken by all operators exceeding five on any day. When the allocation system was implemented in the Regional Coastal Plan, it is my understanding that the allocation values were not derived from a specific source or report and were determined largely by considering the level of activity at that time and allowing for some growth, and anecdotal evidence. Due to the lack of reasoning as to how allocation numbers were derived, it is difficult to accurately determine a suitable level of cumulative effects that are no more than minor. I am not aware of any subsequent study to support the numbers set in the Plan.

For other operators, it is a source of frustration that the limited number of day trips available are mostly held by one operator. While not a RMA consideration, it stifles innovation and competition in regard to the type of trips and experiences that can be offered. To our knowledge, operators accept that the level of activity in Doubtful Sound need to be controlled, but their experience is that there is still scope for activities that are currently classified as non-complying without causing significant adverse effects.

The activity associated with this application is, for the most part, existing, but some minor changes have been proposed. The activity is different to the normal day trips carried out by the main operator and offers a more personalised experience that involves getting a bit closer to the environment. It is organised in such a way that conflict with other activities is, for the most part, avoided, but safety requirements means that supervision with a vessel is necessary to reduce the risk for those kayakers.

At present, all available trips outlined in the RCP are allocated, however this does not mean that all the trips available are being used. There are a number of reasons as to why allocated trips are being unused with weather conditions and visitor numbers having a large bearing on the ability for trips to operate.

Generally, not all trips operate on the same day for similar reasons. The number of trips being used does increase in the summer months when there is an increase in visitors to Doubtful Sound, however when averaged over the quieter winter months, the level of activity overall is low.

OTL aim to provide its visitors with a high quality experience in Doubtful Sound, therefore it is a priority for them to maintain the wilderness and tranquility values present in Deep Cove and Doubtful Sound.

As previously mentioned, the company intentionally plan their trips to avoid accessing certain areas at the same time as other operators, and to visit areas where there is the lowest number of vessels present and other activities such as kayaking occurring.

Kayaking trips commence once all the overnight boats from various companies have returned to Deep Cove, usually between 9 and 10am so generally very few vessels are encountered. Seasonal lobster boats may arrive or depart early in the morning and privately owned vessels usually arrive or depart later in the afternoon. These timeframes are also largely outside the timeframes of when the kayaking activity is occurring.

Further out in the fiords, the expanse of water is much greater with vessels usually being quite far apart when cruising, due to Maritime NZ regulations. Groups that are seen once the trip leaves Deep Cove is normally another company's group of overnight kayakers and day cruise vessels. As the kayak tour passes under Commander Peak in Hall Arm, they are within sight of a day cruise vessel for a few minutes only.

Within Hall Arm another company's kayak group also overnight in this area. To ensure that each group has a quality experience, they each kayak along opposite sides of the arm. Often group members won't even notice there is another group of kayakers in the area, even with their bright orange kayaks and gear. The intention is to keep as much distance as possible, to ensure all visitors have a quality experience.

Thompson Sound is mainly frequented by cruise ships and small private vessels travelling out to the entrance or Deas Cove. The frequency of these vessels movements is considered to be extremely low when compared to vessel movements in areas such as Milford Sound.

The safety vessel is kept out of sight of all kayak group as much as possible, usually in one of the many bays. The only exception is during times when a higher level of supervision is required, e.g. if the forecast is adverse, with the vessel then remaining within a short distance of the kayaking group so assistance can be provided quickly. By having the safety vessel close but out of sight, it provides security to visitors should they need assistance while still providing them with the feeling of remoteness.

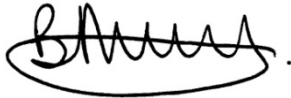
Noise from vessels operating within the area is not considered to be an issue. Offspring Travel is not aware of any complaints from guests or other users of the Deep Cove, Doubtful Sound area about cumulative vessel noise. The company has noted that a small number of syndicate boats make exhaust noise that is noticeable, however it is not considered excessive.

5. *An update on any feedback from the customary marine title applicant groups.*

To date no correspondence has been received from the customary marine title applicant groups since a copy of the application was emailed to them on the 27 July 2020.

If you have any questions or queries, or would like to discuss, please do not hesitate to contact me.

Kind regards,



Bridgett Aitken
Planner, Bonisch Environmental