

BEFORE COMMISSIONER WASLEY APPOINTED BY NEW PLYMOUTH DISTRICT COUNCIL

UNDER

the Resource Management Act 1991 ("RMA")

IN THE MATTER

of an application under section 88 of the Act by **GREGORY AND DEBORAH HOW** to the **NEW PLYMOUTH DISTRICT COUNCIL** for land use consent application to establish and operate commercial accommodation at 1844 Egmont Road, Kaimiro.

STATEMENT OF EVIDENCE OF DAVID CARL BOLGER ON BEHALF OF GREGORY AND DEBORAH HOW

1. INTRODUCTION

- 1.1 My full name is David Carl Bolger. I am a Professional Mountain and Rock Guide and hold current professional qualifications with the New Zealand Outdoor Instructors Association (NZOIA). Qualifications I hold include NZOIA Alpine 2, Rock 2, Bush 1, and Avalanche Safety Management Stage 1.
- 1.2 My experience includes over 33 years of personal climbing, with 25 years working professionally in the outdoor industry throughout New Zealand. I was raised in Taranaki, therefore a significant amount of my personal climbing and professional guiding has been undertaken on Taranaki Maunga.
- 1.3 Currently I work for Top Guides as their Lead Alpine Guide and Technical Expert. Top Guides are the only mountain guiding company that hold a concession to legally guide commercial summit climbs in Egmont National Park.
- 1.4 I am a current team member of the Taranaki Alpine Cliff Rescue Team and a committee member. I am a current member of the Taranaki Alpine Club and first joined in 1987. I am also a current member of the New Zealand Alpine Club and a committee member for the local section.

- 1.5 I have completed over 600 ascents of Taranaki Maunga via every possible summit route in both summer and winter and have established over 100 first ascents of both rock and alpine routes on Taranaki Maunga.
- 1.6 I am also the Environment Manager at BTW Company in New Plymouth. I hold a Bachelor of Science (Physical Geography and Environmental Science) from Massey University (1996). I hold the BOHS IP404 Air Monitoring, Clearance and Reoccupation following the Removal of Asbestos. I am also a Certified Environmental Practitioner (CEnvP) with the Environmental Institute of Australia and New Zealand (EIANZ) Certification No.870.
- 1.7 This evidence is given in support of the land use consent application ("the application") lodged by Gregory and Deborah How ("the applicant"), to construct and operate commercial accommodation at 1844 Egmont Road, Kaimiro including 10 chalets, 24 powered sites for motorhomes and a utilities building with dwelling.
- 1.8 I am authorised to give this evidence on behalf of the applicant.

2. INVOLVEMENT IN THE PROJECT

- 2.1 My involvement in the application has included:
- (a) My involvement in the project has been to provide expert evidence on mountain activities, with a specific focus on the likelihood that guests at the proposed commercial accommodation of North Egmont Retreat would be participating in sunrise or night climbs on Taranaki Maunga.
- 2.2 I have also reviewed the material produced with the application, including the AEE dated 12 March 2019, the section 92 RMA response dated 20 September 2019, the amended application details submitted to New Plymouth District Council ("NPDC") on 31 July 2020 and the further section 92 RMA response submitted to NPDC on 25 September 2020 (within the context of my expertise in relation to this evidence).
- 2.3 I have also reviewed the updated Noise Assessment dated the 7th of August 2020.

3. CODE OF CONDUCT

- 3.1 I confirm that I have read the Code of Conduct for expert witnesses contained in the 2014 Environment Court Practice Note and that I agree to comply with it. I confirm I have considered all the material facts that I am

aware of that might alter or detract from the opinions I express. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

4. PURPOSE AND SCOPE OF EVIDENCE

4.1 In this matter, I have been asked by the applicant to address the likelihood that guests staying at the proposed commercial accommodation would participate in sunrise or night climbs on Taranaki Maunga and the nature and frequency of these activities.

4.2 My evidence is structured as follows:

- (a) Sunrise Summit Climb Opportunities
- (b) Other Night Time Mountain Activities
- (c) Anticipated North Egmont Retreat Clientele
- (d) Summary
- (e) Conclusion

5. SUNRISE SUMMIT CLIMB OPPORTUNITIES

5.1 Firstly, Taranaki Maunga is New Zealand's second deadliest mountain with claiming over 80 lives in just over 100 years. Taranaki Maunga is an isolated volcanic cone with close proximity to the Tasman Sea, and exposed to the prevailing westerlies. This geographical situation provides the catalyst for rapid and extreme weather changes which need careful consideration if attempting a sunrise summit climb.

5.2 Sunrise summit climbs generally start at 12.30am to 1.00am from the North Egmont Visitor Centre, Egmont Road with a summit climb anticipated to take around 4 hours to reach the summit area. The climb is completed in complete darkness, except for maybe the last 100 meters in anticipation of the sunrise over the Central Plateau.

5.3 People wanting to experience a sunrise high on the Maunga require optimum conditions. These conditions would include a perfect forecast, clear skies, light winds and no snow or ice; also, people generally try to align the climb with optimum moon conditions to provide additional lighting and safety with the climb.

- 5.4 Sunrise summit activities are generally limited to summer conditions, when access to the crater and summit area is basically void of any snow. From my experience anyone attempting a sunrise summit when winter conditions prevail is very rare and likely limited to only experienced local climbers.
- 5.5 Summer conditions, when ice axe and crampons and specialist skills are not likely required generally start from the end of December through to the end of March. However winter conditions can still be possible during this time period as snow does fall anytime of the year, making the summit route impassable for less experienced and equipped climbers.
- 5.6 Even a small snow fall around the summit area in summer, makes access hazardous for inexperienced people, especially at night time and early morning, when the snow would still be frozen and would require technical equipment and skills to safely negotiate. These conditions would not be conducive to a sunrise climb even under perfect weather conditions, unless climbers were highly experienced or with a professional guide.
- 5.7 The probability to align all these specific factors in the summer window opportunity for a sunrise climb is low, especially the clear skies which are paramount for the trip to be even considered.
- 5.8 I have reviewed rainfall data from the 1st of January 2020 to the 31st of March 2020 collected by Taranaki Regional Council at North Egmont Visitors Centre. Of the 91 days during this time period, 31days¹ recorded rainfall.
- 5.9 Using rainfall data from the North Egmont Visitors Centre at 960 meters for one discrete three-month period is considered a blunt tool in determining possible sunrise summit opportunities. The reason being, the summit of Taranaki Maunga is 2518 meters and more precipitation falls with altitude, this also does not take into account cloud cover, wind speed and surface conditions which are contributing factors when considering a summit climb. However, the rainfall data does provide an understanding that the window of opportunity for a sunrise summit climb is limited.
- 5.10 It is reasonable to presume that summit climbs are only likely possible 15 to 25 days within the summer season window. With the average group size less than 10 people.
- 5.11 Also, from my experience, people attempting a sunrise summit climb are either local or have some previous mountain experience due to the fact that

¹<https://www.trc.govt.nz/environment/maps-and-data/site-details/?siteID=24&measureID=1&timePeriod=365days>

venturing on a significant climb in the dark requires more experience and decision-making skills. Therefore, I am of the opinion that people staying in the applicant's proposed retreat are unlikely to be experienced mountain people, as experienced mountain people don't tend to stay at higher end accommodation facilities like North Egmont Retreat. Therefore, any vehicle movements within the proposed development for a sunrise summit climb would likely be rare, and limited to the summer season.

6. OTHER POSSIBLE NIGHTTIME ACTIVITIES ON THE MAUNGA

6.1 There is a possibility that guests staying at the proposed retreat might engage in other activities on the Maunga at night. These activities could, for example, include night photography, Kiwi or fauna monitoring or a very early start on a planned activity like a one day round the mountain circuit.

6.2 However, the above activities mentioned are considered to be rare and not a common occurrence, especially from tourists staying in a motor home park.

7. ANTICIPATED NORTH EGMONT RETREAT CLIENTELE

7.1 From my experience, working as a guide in Taranaki and in the South Island, and often collecting clients for mountain trips from their accommodation, the clientele typically have limited mountain experience and are not the type of people that would participate in night climbs in challenging alpine environments.

7.2 Also, from my experience guiding sunrise Summit trips on Taranaki, the people you meet during these night time trips are more likely local people, or, if a tourist, they are generally young backpacker types and not the type of people that would stay at a facility like the North Egmont Retreat, as backpackers generally stay at low cost budget accommodation facilities.

7.3 From my experience, people staying at a facility like the North Egmont Retreat are more likely to participate in daytime activities on the Maunga. As the people that stay at these types of facilities are generally older and less adventurous to undertake night time activities on the Maunga.

8. SUMMARY

8.1 By way of a summary, my detailed assessment and local experience enables me to confidently conclude that:

- (a) Sunrise summit opportunities have a low likelihood of taking place, due to several conditions needing to align to make a climb possible including the season, weather and surface conditions.
- (b) Other requirements for anyone undertaking a sunrise summit climb is an appropriate level of experience and or knowledge of the mountain. From my experience people staying at the type of commercial accommodation proposed are not typically local and are generally on the low end of experience in the mountains. Therefore, in my opinion, only a small number of guests are likely to undertake night time activities on the Maunga.
- (c) Night time activities on the Maunga are rare, and are more often than not associated with locals with experience on the mountain.
- (d) Therefore, in my opinion it would be rare for people staying at the proposed North Egmont Retreat to be active at night and driving vehicles through the Retreat and onto Egmont Road to access the Maunga at night.

9. CONCLUSION

- 9.1 I conclude from my experience and background that sunrise summit and other night time activities on the mountain are rare, and require a number of conditions to align to even be considered and undertaken.
- 9.2 From my experience, clientele staying at facilities like the proposed North Egmont Retreat are likely to be at the lower end of mountain experience, therefore less likely to undertake activities on the mountain at night.
- 9.3 The limited season and conditions required to attempt a sunrise summit, provide evidence that night time activities on the Maunga are rare.

David Bolger

27/10/2020