



## Federated Mountain Clubs of NZ (Inc)

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7 June 2011

Southland District Council  
P O Box 903  
INVERCARGILL 9840

Submission on application concerning resource consent or esplanade strip that is subject to public notification or limited notification by consent authority

**To:** *Southland District Council*  
**Name of submitter:** *Federated Mountain Clubs of New Zealand Incorporated*

This is a submission on *an application by Nevis Snowmobile Adventure for resource consent to operate a commercial snow mobile tour business.*

The specific parts of the application that my submission relates to are *the entire application.*

My submission is—

I write on behalf of Federated Mountain Clubs of NZ Inc which represents some 15,000 members of tramping, mountaineering, climbing and other outdoor recreation clubs throughout NZ, and indirectly represents the interests and concerns of many thousands of private individuals who also enjoy recreation in the back country.

We oppose the granting of this consent.

The operation of skidoos, along with associated helicopter operations, will have a considerable adverse impact on recreational users of the wider area i.e. cross-country skiers. In particular, it will have an adverse effect on natural quiet values. Natural quiet is a natural resource and you are therefore required by the Resource Management Act 1991 to look at its sustainable management. Granting this application would be contrary to Objective RU4 of the district plan “To maintain where practicable and efficient, the amenity values of the rural landscape”.

The Old Woman Range is one of the most significant back country (as opposed to commercial developments such as the Snow Farm on the Pisa Range) cross country ski areas in the country. This area was described in Federated Mountain Clubs’ seminal 1988 publication *Outdoor Recreation in Otago, Volume 1* as “the largest contiguous tract of winter snow cover in Otago and Southland”.

We note that the concession area, and in particular the base – which, as a focal point, is likely to be the main location for activity and therefore noise – is adjacent to the Old Woman Range Conservation Area. The measured dBa readings at distances of 15 or 100 metres are meaningless in this context, as the intrusion of persistent mechanical noise can be noticed, particularly in still conditions, from distances of many kilometers.

The applicant's suggestion that an average of 29 back country skiers use the Old Woman Range shows an absence of understanding of usage patterns and a flawed understanding of the relationship between hut book entries and user numbers. It assumes that all users pass the hut, and that all users fill in the hut book. The first assumption overlooks the fact that there are several other access routes. The second assumption is desirable, but it is widely recognized that many users of the back country do not make hut book entries.

Even if the numbers are considered low, to suggest that their concerns should be ignored displays an arrogance which suggests that the applicants believe that their activity is intrinsically of greater worth than back country skiing and that this justifies displacing them.

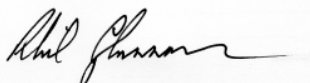
The suggestion (made in earlier submissions by the applicant's solicitor) that this activity can be justified as a means of allowing those unable to travel to this area under their own steam to be there is patently nonsense. If we followed that logic, we also need a gondola up Aoraki/Mt Cook and many other places beyond the reach of many. There is ample opportunity for such people to enjoy a Central Otago in winter at the commercial facilities on the Pisa Range, with the snowcat operations on the Old Man Range, or with various heli-ski operators. All these are, like the applicant's proposal, expensive operations aimed largely at the overseas tourist. Cross country skiing, on the other hand, is a cheap sport, requiring equipment only. While it can be physically demanding, it is also possible to do it at a relatively gentle level of exertion. Thus it is accessible to young and old, and to a wider spectrum of society than even downhill (skifield) skiing. The applicant's solicitor's implication that cross-country skiing is elitist is therefore able to be refuted. Clearly, if any user is elitist it is the applicant.

If this resource consent is to be granted (and in recognising that possibility we are not in any way resiling from our opposition to it), we seek a condition that the consent expires if the land reverts to full Crown ownership and control under the tenure review process.

We wish to be heard in support of the submission.

\*If others make a similar submission, I will consider presenting a joint case with them at the hearing.

\*Pursuant to [section 100A](#) of the Resource Management Act 1991 I request that you delegate your functions, powers, and duties required to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.



P Glasson  
Secretary