

23/04/2017

Director-General
Department of Conservation
PO Box 5244
Dunedin 9058



Attn: Richard Clarke

Dear Richard

Intention to grant variation of concession OT-31008-GUI to Tourism Milford Ltd

I write on behalf of Federated Mountain Clubs of NZ Inc. (FMC) which represents some 20,000 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.

FMC can accept the rationale for building a lunch shelter, and supports the removal of large guided groups from the public Lake Howden Hut. However, we have significant concerns about the location and size of the proposed building.

The proposed site could be described as prime lakefront real estate. It is commonly used by the public as a place to sit beside the lake and to swim from, slightly removed from the hut. Establishing the lunch shelter there amounts to private capture of the best lakeside spot. It reduces the serenity, wilderness values and intrinsic values available to non-guided trampers and day-walkers, who wander down to the clearing on the lake front to enjoy the lake. These people will have the quality of their experience diminished by the presence of a hut that they can't use. The positioning of the shelter is obviously intended to leverage the views of the lake that the lakefront clearing facilitates. Effectively it makes the non-guided trampers second class citizens.

The Fiordland National Park Management Plan states:

The spacing and location of huts and other structures should be designed to ensure the track retains most of its natural character. The following criteria should be met by the Department of Conservation and concession applications:

- a) All visual, social, cultural and ecological impacts both at the site and in the wider context should be managed*

and

The location, design colour and scale of any development should be such that they are compatible with, rather than detract from, the natural setting.

Similar provisions exist in the General Policies on National Parks.

FMC submits that any reasonable reading of these provisions shows that the location of a private building at the proposed site completely fails to manage, at least, the visual and social impacts at the site and completely fails to be compatible with, rather than detract from, the natural setting.

We also note Section 4(2)(e) of the National Parks Act 1980, which states

subject to the provisions of this Act and to the imposition of such conditions and restrictions as may be necessary for the preservation of the native plants and animals or for the welfare in general of the parks, the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features.

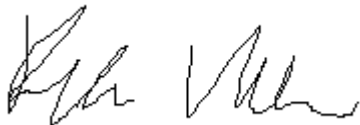
Placing this structure in such a key location will seriously impeded the ability of the public to "receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived from" of this magnificent and popular place.

FMC submits that an alternative location should be selected. We acknowledge that this may require additional vegetation clearance, but consider that negating the significant loss of amenity values to several thousand members of the public annually if the proposed site was used warrants this. If a suitable alternative location cannot be found, the application should be declined outright.

FMC also submits that the size of the proposed building is inappropriate. The proposal is for a lunch shelter – a building to provide an alternative to eating outside when conditions are inclement – not a lunch restaurant. Something of similar scale to the applicant's building at Harris Saddle would be more appropriate.

FMC wishes to be heard in support of this submission, probably by video conference.

Yours faithfully,



Peter Wilson

FMC President

FMC – FEDERATED MOUNTAIN CLUBS

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