



The Department recommends that you contact the Department of Conservation Office closest to where the activity is proposed to discuss the application prior to completing the application forms. Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form is to be used when the proposed activity is the building or use of any private or commercial facility or structure on public conservation land managed by the Department of Conservation. Examples may include lease of land to erect an information centre; authorisation to erect a weather station; or construct or lease a private/commercial campground or lodge. This form is to be completed in conjunction with either Applicant Information Form 1a (longer term concession) or Applicant Information Form 1b (one-off concession) as appropriate.

Please complete this application form, attach Form 1a or Form 1b, and any other applicable forms and information and send to [permissions@doc.govt.nz](mailto:permissions@doc.govt.nz). The Department will process the application and issue a concession if it is satisfied that the application meets all the requirements for granting a concession under the Conservation Act 1987.

If you require extra space for answering please attach and label according to the relevant section.

## A. Description of Activity

Please describe the proposed activity in detail – where the site is located, please use NZTM GPS coordinates where possible, what you intend to use the building for, whether you intend to make any changes to the infrastructure.

Please include the name and status of the public conservation land, the size of the area for which you are applying and why this area has been chosen.

If necessary, attach further information including a map, a detailed site plan and drawings of proposal and label Attachment 3b:A.

### **Location:**

*The site is located at Erewhon Park Ski Field/Mt Potts and is identified as Parcel 7123831, legally described as Section 2 SO 407150 and is vested in the Crown:*



Q Results

List Details

NO ITEM SELECTED

Property Details

Parcel

ID: 7123831 Area: 321.8721 ha

Sales Information

*The site is in the Southern Conservation Parks Place and is part of the Hakatere Conservation Park – see Map 5.2.1: CMS – Canterbury (Waitaha).*

*The site is identified as a 'Ski Area – Mt Potts', in the CMS.*

*A Google Earth link for Erewhon Park Ski Huts, including location, aerial and 3D perspective is available on request.*

### **Activity:**

**Stage 1:** *1 permanent hut for up to 8 people for recreation accommodation - ski tourers and split boarders, and toilet facilities – solid waste will be flown out. The hut will be built off site and assembled onsite.*

*The hut measures 4.8m x 4m (19.2m<sup>2</sup>) plus an adjoining deck covering 2.2m<sup>2</sup> and steps – see Fig. 1 below. A separate single toilet will be located nearby. The hut design is traditional in form with a pitched roof, is 3.9m high and is clad in vertical corrugated type iron (Figure 2). The hut colour (all external cladding, joinery and trim) are Colorsteel 'Pioneer Red' (LRV 13%) ([www.colorsteel.co.nz/colours/](http://www.colorsteel.co.nz/colours/)) or will be recycled corrugated iron. See Fig. 2 below.*

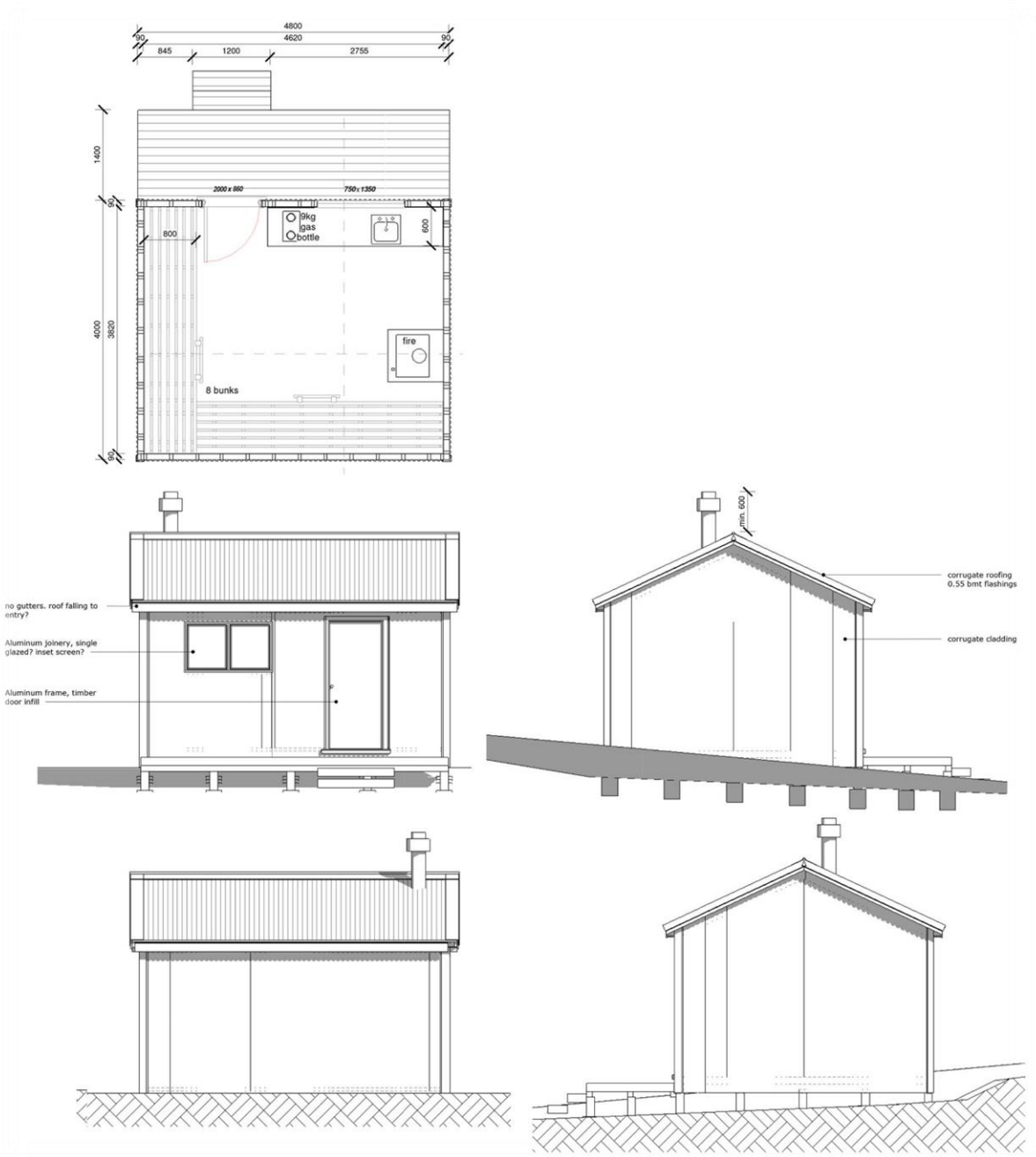


Fig. 1: Hut plan and elevations



*Fig 2: Proposed hut, Cass Valley, Glenmore Station*

**Stage 2:** Subject to satisfactory demand for Stage 1, Stage 2 includes:

- Up to 2 temporary (winter) huts/yurts for 6 – 8 people each and additional toilet facilities as required. The yurts will be erected on permanent timber decks in the autumn for the winter and removed in the spring. Yurts come in a number of sizes, colours, fabric options and configurations. See [www.yurts.com](http://www.yurts.com) for more information. Yurts include snow and wind upgrades (including cable tie-downs) for structural strength and are designed for all weather conditions including high winds and heavy snow packs. See *Pacific Yurts Brochure – Attachment 3b:A*.
- A small storage shed – less than 20 square metres, to store temporary accommodation in the summer, firewood and hut supplies.



*Fig 3. Yurt example*

*The huts will be located in the area as shown on the attached site plan.*

*See Cass Valley Huts on Glenmore - <https://www.glenmorestation.co.nz/huts>, or Kelly Hut - <https://www.mountainhut.nz/hut>, will give you some idea of the scale and nature of the proposed accommodation.*

*The accommodation is for public use and will be advertised on a website including an on-line booking system. These are NOT private huts. The activity is primarily for 'on the mountain' accommodation for ski tourers and split boarders. The accommodation will be self-catered.*

### **Why:**

*Experience with the Cass Valley Huts has highlighted demand for this type of accommodation to access the backcountry for ski touring and split boarding. There is currently limited opportunity to book out a hut in an alpine environment.*

*The existing access – Mt Potts ski field 'road', proximity to Christchurch, elevation – the huts are located at 1800m, terrain, and the status of the site as a 'Ski Area' in the CMS make Mt Potts an ideal location for mountain accommodation and backcountry skiing/boarding.*

*The existing road is not suitable for vehicles. Access will be walk in, e-mountain bike or by helicopter. The activity does not involve upgrading the existing road other than repairs and maintenance as required to maintain current levels of access.*

*Mt Potts ski field has been abandoned as a ski area. Given the relative isolation, capital investment required to open and operate a ski field, costs and difficulties associated with maintaining vehicle access, limited ski season, limited visitor numbers and climate change, it would likely be uneconomic to open and operate a traditional ski field at Mt Potts. There is an opportunity to re-invent Mt Potts as a backcountry ski area destination for ski touring and split boarding with minimal investment and infrastructure – accommodation, limited guiding/backcountry instruction, and incidental helicopter access.*

*The CMS recognises that ski areas provide important snow sport opportunities. These opportunities are increasingly under threat due to the effects of climate change and the failing economics of existing club fields. A fresh approach needs to be taken to continue to provide snow sport opportunities which is precautionary in so far as any infrastructure maybe ultimately be removed and is light in terms of its environmental footprint.*

*The increasing popularity of ski touring, demand for on the mountain accommodation, technological advances in and availability of ski touring equipment, and use of e-mountain bikes for access, make Mt Potts an ideal location for the activity and viable as a backcountry ski area.*

*The activity gives snow sport enthusiasts the opportunity to book accommodation and stay on the mountain.*

*The activity does not involve modifying landforms or installing tows or other infrastructure normally associated with ski fields. The activity is largely in response to climate change and the growing demand for ski touring and split boarding including on the mountain accommodation (given the effort typically involved in accessing ski touring terrain).*

*The 1 permanent hut will be constructed off site and flown in and assembled on site allowing it to be relatively easily disassembled and removed. The temporary huts are obviously temporary. No modification to landform or other infrastructure commonly associated with a ski field is proposed. The activity requires minimal capital investment which is precautionary in terms of ski area development consistent with the CMS.*

*In the event that climate change results in the activity being under used or redundant, the permanent hut might be suitable for year-round accommodation or simply removed. Likewise, temporary accommodation simply won't be erected, and the permanent platforms removed.*

*Ski areas are recognised in the CMS as providing intensive use recreational experiences for visitors.*

*The concession granted to Mount Potts Station Ltd (and assigned to Mount Potts Lodge Ltd) contemplates the use of the area for ski field related activities. The concession is not being exercised nor does it appear to have been exercised since 2014 - other than potentially in respect of helicopter landings. The concession provides that DoC may terminate the concession if it is not being exercised (if it has not already been terminated). The concession activity does not include mountain accommodation. Attached is a copy of the Concession granted to Mount Potts Station Ltd – **Attachment 3b: B.***

*The concession provides for co-siting where it does not impact on the ability of the concessionaire to conduct the concession activities. The proposed accommodation is complementary to the existing concession activity - whether or not it is exercised. If anything, given the lack of vehicle access, the presence of on-site accommodation enhances the concessionaire's ability to conduct the concession activities.*

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## **B. Alternative sites considered**

If your application is to **build, extend or add** to any permanent or temporary structures or facilities on public conservation land, please provide the following details:

- Could this structure or facility be reasonably located outside public conservation land? Provide details of other sites/areas considered.
- Could any potential adverse effects be significantly less (and/or different) in another conservation area or another part of the conservation area to which the application relates? Give details/reasons

*Most, if not all, of the sites suitable for ski touring accommodation are located inside public conservation land being over and above 1,200m – ideally higher.*

*There is an existing access road which can be used by walkers and e-mountain bikers to access the area and avoids the need for any modification to the landform.*

*The site is recognised in the CMS as a ski area and a concession has previously been granted for a ski field.*

*The site has been subject to advice on significant inherent values within the Mt Potts pastoral lease including the Erewhon Park Ski Field as part of the Crown Pastoral Land Tenure Review process – see attached Conservation Resources Report - **Attachment 3b: C***

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### **C. Larger area**

Is the size of the area you are applying for **larger** than the structure/facility?

**NO**

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### **D. Exclusive possession**

Do you believe you need **exclusive possession** of the public conservation land on which your structure/building is located, ie no one else can use the land during your use of it? (*Exclusive occupation requires a lease which requires public notification of the application*)

**NO**

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### **E. Technical Specifications (for telecommunications sites only)**

**N/A**

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### **F. Term**

Please detail the length of the term sought (i.e. number of years or months) and why.

*Note: An application for a concession for a period over 10 years must be publicly notified, an application for a concession up to 10 years will not be publicly notified unless the adverse effects of the activity are such that it is required, or if an exclusive interest in the land is required.*

**Up to 10 years.** *10 years is a reasonable term to better understand user requirements and the need (and justification) for a longer term, and generate some return on the initial investment.*

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## **G. Bulk fuel storage**

Under the Hazardous Substances and New Organisms Act 1996 (HSNO Act) 'Bulk fuel storage' is considered to be any single container, stationary or mobile, used or unused, that has a capacity in excess of 250 litres of Class 3 fuel types. This includes petrol, diesel, aviation gasoline, kerosene and Jet A1. For more information on Hazardous Substances, go to: <http://www.business.govt.nz/worksafe/information-guidance/legal-framework/hsno-act-1996>

Do you intend to store fuel in bulk on the land as part of the activity?

**NO**



## H. Environmental Impact Assessment

This section is one of the most important factors that will determine the Department's decision on the application. Please answer in detail.

In column 1 please list all the locations of your proposal, please use NZTM GPS coordinates where possible. In column 2 list any special features of the environment or the recreation values of that area. Then in column 3 list any effects (positive or adverse) that your activity may have on the values or features in column 2. In column 4 list the ways you intend to mitigate, remedy or avoid any adverse effects noted in column 3. Please add extra information or supporting evidence as necessary and label Attachment 3b:H.

Refer to Steps 1 and 2 in your Guide to Environmental Impact Assessment to help you fill in this section.

Location on public conservation land	Special feature or value	Potential effects of your activity on the feature or value (positive or adverse)	Methods to remedy, mitigate or avoid any adverse effects identified
Erewhon Park/Mt Potts Ski Area	No known special features or biodiversity values.	No effect on biodiversity values.	The permanent hut, and decks for temporary huts, will be constructed off site and assembled on site minimising construction activity on site. Holes for foundations will be dug by hand and timber poles used to minimise ground disturbance. Waste will be removed from the site. The site of the huts is essentially scree with little or no vegetation likely to be affected. The huts will be used in winter when the ground is covered in snow.
	Recreation values – snow sports.	Positive effect on recreational values.	Currently it is a long walk into to access the area for a day trip. There is limited opportunity for on the mountain accommodation in the area at elevations which support ski touring and split boarding. The club fields are set up for club members, are predominantly for downhill skiing and are at relatively lower elevations. Accommodation will likely result in increased use of the area for snow sports.
	Landscape values.		The effect on landscape values is likely to be minimal. The area has been identified as a 'Ski Area' in the CMS with the likely expectation of infrastructure including tows, day lodges and implement sheds. The huts will only be visible to those accessing the area likely for snow sports in the winter and to use the huts. The huts are relatively small and modest design and use of materials typical of backcountry huts. Recognition of ski fields' location on public conservation land is readily apparent to visitors.

## I. Other

Is there any further information you wish to supply in support of your application? Please attach if necessary and label Attachment 3a:l.

### **Consultation:**

AEC (Aoraki Environmental Consultancy Ltd – [planner@aecltd.co.nz](mailto:planner@aecltd.co.nz) was contacted by email on 1 December 2021 including an overview of the proposal. As at the date of the application no response has been received. Following consultation with AEC the application maybe updated to incorporate any comments, support or opposition for the activity.

### **Landscape Values:**

Erewhon Park Ski Area – Landscape Unit 7 in the Conservation Resources Report, is described in the report as follows:

#### Landscape Unit 7

This unit comprises the long alpine valley that contains Erewhon Park Ski Field. This valley penetrates into the Potts Range from the south and is defined in the north by a head basin that features high peaks and steep head-walls. Mid-valley slopes are covered in a mantle of stable scree, and the bottom section is confined in a narrow gorge cut into the faces that overlook the Rangitata Valley.

Rock and scree dominate the upper parts of the unit with snow tussockland and shrubland along the stream margins. The lower, incised part of the valley supports mountain beech forest, with patches of mountain totara on surrounding gorge-sides. This valley contains a number of “built” elements including a well-formed road and parts of an old ski tow.

#### Landscape Values

This unit contains high landscape values. Within this symmetrical valley the landform completely dominates the vegetation. The fine texture and blue-grey colorations of the scree create vivid patterns when adjacent to patches of snow tussock. This valley forms the impressive alpine backdrop to the ski area, and the present scale of this operation is subservient to the high inherent values contained within the valley.

#### Visual Values

This unit has moderate visual resource values. It is visually accessible from the ski field road, and the overall sense of enclosure becomes greater when ascending the valley.

#### Potential Vulnerability to Change

This unit is moderately sensitive to change. The main threats include:

- o Spread of gorse and broom along the ski field access road.
- o Upgrading of the ski field road on the steeper slopes.
- o Damage to the tall tussock during “grooming” of the slopes.
- o Further proliferation of discarded ski field equipment.
- o Possible power projects.

*Any potential adverse landscape or visual effects of the activity are very low. The activity is not a “main threat” identified in the Conservation Resource Report for the area.*

*Any adverse effects brought about by the activity will largely arise from the simple fact that a built element has been introduced into a landscape where none currently exist. Remediation and mitigation are therefore not considered relevant. Avoidance, however, is relevant to the proposal. Techniques of ‘avoidance’ are listed below:*

- *The location of the hut is on the headwall of the valley and is able to be screened from the*

valley floor or approach. The intention however is to ensure the hut is partially visible from the approach to guide visitors. The location avoids prominent ridges or skylines.

- There are no tracks proposed which would expand any effects of the built changes to the landscape. But for the huts the landscape will not be modified and the huts ultimately removed (or able to be removed).
- Substantial excavations are not required as the hut is on piles, raised above the ground.
- The size of the hut and separate toilet shelter is very small. The size and scale of the structures is truly subservient to the high inherent values contained within the valley.

Backcountry huts are iconic in the New Zealand landscape. They espouse practicality, integrity and site sensitivity. They weather desert-like droughts, nor-west blizzards, heavy snowfalls, driving southerlies and torrential rain. They are a lighthouse to those who venture into the backcountry. They epitomise what it means to be in the backcountry and enhance any backcountry experience.

### **Indigenous Plant Communities and Notable Flora:**

Indigenous plant communities are described in the Conservation Resources Report. The activity does not impact on the communities described in the report. There is no notable flora in the area affected by the activity.

### **Fauna:**

Four endemic lizard species were recorded in Conservation Resources Report as being present on the Mt Potts Pastoral Lease, one of which one is listed as threatened. The main lizard habitats on Mt Potts Pastoral Lease are: Mt Sunday; Deep Creek and the Mt Sunday wetlands; gullies on the front (Rangitata Valley) faces; the eroded escarpment above the lower Potts River; the lateral moraine terrace; and, the alpine zone. The lizard species found in these areas are described in the report. Two dry gullies east of the ski field road gully were searched intensively for lizards. One common/McCann's skink and one juvenile common gecko "Southern Alps" were recorded. No lizard species were recorded in the alpine zone where the huts are proposed to be located. In any event disturbance to any habitat will be limited to post holes and highly unlikely to displace lizard species to the extent that they maybe present.

### **History:**

Thomas Henry Potts, F.G.P. Leach and Henry Phillips first explored the Ashburton side of Hakatere in April 1857. Potts took up the land around Lake "Clear Water" and ran it as a cattle property until 1870. In 1894 the run was combined with Mt Possession. This continued until 1911 when the country was divided again into two leases and Mt Potts was formed on the western side of the Potts River. Later the run was run in conjunction with Erewhon station by the Urquhart family and it was at this time that the Erewhon ski field was established on what was the Mt Potts lease. The ski field ultimately fell into disuse and has been abandoned. The history and legacy however remain and is still widely remembered in the ski community. The activity seeks to reconnect with this history in a low key and sympathetic way which is sustainable for present and future generations to experience and enjoy.

### **Legal Access:**

Legal access to the site is available via the public right of way easement which follows the Erewhon Ski Field Road. See attached Easement - **Attachment 3b:D**.

### **Recreational Activities:**

The ski field is identified as being the key recreational activity for the property in the Conservation Resources Report albeit does not currently exist as an activity.

### **Conservation Management Strategy:**

There is an expectation in the CMS that Mt Hutt and Mt Potts ski fields will provide intensive use

recreational experiences for visitors. This is not currently the case for Mt Potts due to there being no vehicle access, no on the mountain accommodation and an absence of any facilities to promote or encourage any intensive use.

Recreational use on public conservation land is encouraged in the CMS including providing backcountry destinations for the recreation needs of the backcountry community.

The Department manages a well-established network of visitor facilities and recreational opportunities, which is complemented by concessionaire facilities and services. Increased participation in recreation is to be pursued at destinations where DoC can partner with others, including concessionaires, or at Places that experience moderately high visitor numbers and can expect continuing demand. Existing examples of these include the larger ski fields (e.g. Mount Hutt and Porters).

Mt Potts is included in the 10 ski fields which are in the Southern Conservation Parks Place and is identified as a park-specific feature with values additional to the general description for the Place – despite there being no ski field facilities at Mt Potts. Mt Potts is not currently being used for its intended purpose and is a wasted opportunity for visitors wishing to make better use of this area for ski touring and split boarding. While Mt Potts as a ski area is an outcome highlighted for the Place this outcome has not been achieved. The activity is consistent with achieving this outcome.

Ski fields are recognised as being vulnerable to climate change and rising operational costs. This scenario mirrors an international trend and suggests a precautionary approach is needed for proposed ski field developments and terrain modification, especially for the more-vulnerable fields, to minimise abandoned structures and adverse landscape effects. The CMS encourages partnership with concessionaires to maintain a ski field's recreational opportunity. The activity is targeted at backcountry skiers who operate independently with no requirement for staffing or infrastructure other than accommodation. The huts are being constructed with a view to removing the 1 permanent hut and platforms for temporary huts if they are no longer required. The activity is a very low impact operation which has been conceived with climate change and raising operational costs in mind, while providing a recreational opportunity for backcountry skiers and boarders.

The activity is consistent with the CMS.

#### **Ashburton District Plan:**

The site is zoned Rural C in the District Plan. Recreational accommodation is not specifically provided for in the District Plan despite the Plan recognising the importance and use of huts throughout the mountain ranges for recreational accommodation. Visitor Accommodation in the Rural C zone is a Non-Complying Activity pursuant to rule 3.8.6 c). Buildings above the Altitudinal Land Use Line shown on the Planning Maps are a Restricted Discretionary Activity pursuant to rule 3.8.4 a) and Site Standard 3.9.14 b). It is envisaged that if a concession is granted then it will be subject to obtaining the necessary regulatory approvals including resource consents as required.

#### **Canterbury Land and Water Regional Plan:**

While the intention is to fly solid waste out, pit and composting toilets are a permitted activity provided they meet the relevant conditions in rules 5.14 – 5.16.

#### **Canterbury Air Regional Plan:**

The site is not in a Clean Air Zone. Rule 7.82 provides that the discharge of contaminants into air from a small-scale heating Appliance – i.e. a log burner, is a permitted activity provided the site is 2ha or greater in area.

#### **Building Consent:**

It is envisaged that if a concession is granted then it will be subject to obtaining the necessary regulatory

*approvals including a building consent.*