

FTAA-2605-1236

4 June 2026

Kirsty O'Sullivan
Mitchell Daysh limited
By Email: [REDACTED]

Tēnā koe,

Request for further information in relation to your application under the Fast-track Approvals Act 2024

You lodged a substantive application, NZSki Limited Remarkables Ski Area Upgrades and Doolans Expansion Project, under the Fast-track Approvals Act 2024 (the Act) on 20 May 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To inform the EPA's assessment of the application for completeness, please provide a response to the following matters:

Resource Consent – Schedule 5 information requirements

1. Clause 6 of Schedule 5 of the Act requires an assessment of the actual or potential effects on the environment to be undertaken. Queenstown Lakes District Council (QLDC), through mandatory consultation processes with the EPA, has noted:

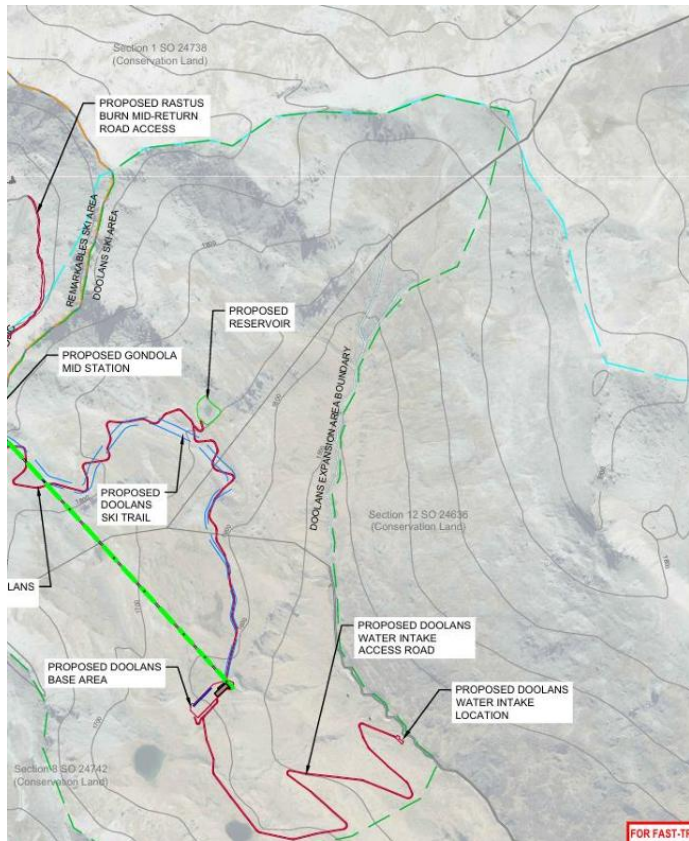
“The traffic assessment supporting the application and the Assessment of Environmental Effects does not undertake a full assessment of wider transport network impacts and performance in relation to additional demand on State Highway 6, in particular the highway in both directions from the ski field access road, and the Frankton Road/State Highway 6 intersection. Rather, it narrowly focusses on the intersection upgrade of the ski field access road and State Highway 6.... QLDC considers that it is important that decision-makers are appraised with a full understanding of the effects of the proposal from additional traffic generation on the transport network.”

Please provide any further information you wish to have considered in response to this comment from QLDC.

Concession - Schedule 6 information requirements

Clause 3 of Schedule 6 of the Act outlines the information required in the application for a concession. Following mandatory consultation with the Department of Conservation (DoC), the following information (with reference to specific sub-clauses) is requested:

2. In accordance with sub-clause (a) please provide a description of the proposed activity in the lands to the north of the proposed infrastructure developments (i.e. the 2 northern 'sub-basins' within the green dotted line of the "Doolans Expansion Area Boundary" - see excerpt from map C00 E103 below). This area does not appear to contain any proposed infrastructure, trails or obvious access from the proposed developments.



3. Sub-clause (f) requires information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration. The application includes land in the Doolans Basin held under s 7 of the Conservation Act for conservation purposes. Please provide further information as to the extent to which the project (for those parts in the Doolans Basin and held for conservation purposes under the Conservation Act) is in keeping with the purpose of conservation as defined in the Conservation Act

4. DoC has also noted that *“although the application acknowledges climate change and how the Doolans proposal is able to improve the resilience and extend the longevity of the ski area generally, due to its south facing aspect; this appears to assume that the Doolans Basin itself is not also affected by climate change... Insufficient information has been provided about how the Project, including new developments proposed in the Doolans Basin itself is consistent with a precautionary approach to developing a ski area in the face of climate change, noting the 40-year term sought. Climate change data and assessment supporting an expansion into the Doolans for the purpose of operating a ski area over the proposed term of the next 40 years, in the face of climate change, is absent.*

Relevant to the matter of climate change effects on the upgrade and expansion project, please provide:

- a. With reference to sub-clause (d) - Information addressing Ski-fields Policy 3.25.2 of the Otago Conservation Management Strategy, which requires the application of a precautionary approach ... the likely longevity of the field in the face of climate change, and any appropriate land remediation and facility removal costs should the ski field cease to operate; and
 - b. With reference to sub-clause (g) - Information addressing the potential climate change effects on the land and its conservation values should climate change make the activity unviable in the future.
5. With reference to sub-clause (g), DoC has also noted a lack of detail in relation to the following potential effects of the proposal:

“Vegetation and related ecosystems:

The application does not put the vegetation ecosystem into the context of the wider ecological district (ED). There has not been an assessment of the ecological importance (including representativeness) of the indigenous biodiversity and ecosystems of the Doolans Basin in the context of other basins in the ED. Therefore, the effects are not sufficiently or accurately described. This will have flow on effects to fauna also.

Invertebrates

There are limitations in the baseline dataset that introduce uncertainty regarding the completeness of the assessment of alpine invertebrate values. In particular, sampling was restricted to mid-late summer and may under-represent seasonally active alpine taxa (noting the recognised importance of spring-early summer activity). In addition, some taxonomic groups of potential ecological significance, including alpine cicadas (Cicadidae), do not appear to have been explicitly considered. These gaps influence confidence in the completeness of the terrestrial invertebrate assessment and the characterisation of conservation values present within the project area.

Avifauna

*A threatened avifauna species with potential to be affected but not recorded during field surveying is rock wren (*Xenicus gilviventris* – Nationally Endangered). Targeted surveying*

along the bottom of rocky bluffs and through boulderfields would be more likely to detect this species if they were present; as opposed the surveying undertaken. This species should be considered in the Terrestrial EIA. Construction of new access roads is mentioned in the Terrestrial EIA, but the potential indirect impacts of these roads are not addressed. These provide a track for predator access and there will likely be an increased effect of introduced species, particularly feral cats which are known to use these access routes readily. Assessment of this increased risk is missing from the application.”

Please provide any further information you wish to have considered in response to these comments from DoC.

Wildlife Act Authority – Schedule 7 information requirements

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

6. In accordance with sub-clause (f) please provide further information you wish to have considered in response to DoC’s comments around how the methods proposed to be used to conduct the actions specified in the Application will ensure that best practice standards are met. Specifically, DoC has made the following comments:

Avifauna

Information to ensure best practice standards are met is not sufficient. For example, information on how methods for relocation of nests ensures best practice is not provided; including examples of where this has successfully occurred for this or similar species.

Lizards

Information to ensure best practice standards are met is not sufficient. This includes why salvage (mitigation) is not being proposed ahead of compensation; which is not best practice. The methods do not state how best practice standards are met.

7. In accordance with sub-clause (g) please provide further information you wish to have considered in response to DoC’s comments regarding the methods that will be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes. Specially DoC has made the following comment:

Avifauna

The methods for humane destruction of avifauna nests (chicks and eggs) is not sufficiently provided.

8. In accordance with sub-clause (h) please provide further information you wish to have considered in response to DoC’s comments regarding the location or locations in which activity will be carried out. Specifically, DoC has noted:

Avifauna

The application identifies the project footprint and includes mapped areas of disturbance, with the draft wildlife approvals confirming that collection and release locations will be spatially defined and recorded. However, specific locations for wildlife relocation are not identified in

the application, and therefore the level of spatial detail remains insufficient. We acknowledge exact locations may not be known, but we expect a broad location for where they propose to move them to.

9. The response to the request relating to sub-paragraph (h) could include description of actual, possible and/or likely relocation areas, and/or criteria to be used to select these.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 2 July 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 2 July 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

If you have any questions, please contact Steph Bougen, Application Lead by email at info@fasttrack.govt.nz.

Nāku noa, nā



Ben Bond

Team Leader, Fast-track Applications