

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Powerhouse
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Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Thank you for your invitation to provide written comments on the application for referral of the Clutha Pumped Hydro project under the Fast-track Approvals Act 2024. This application was reviewed by elected members delegated to participate in the fast-track process and teams across Otago Regional Council (ORC).

Please see our comments on this application and our response to the questions below.

Competing Applications

ORC is not aware of any applications lodged with the Council that would constitute a competing application if a substantive application for the project were lodged.

ORC confirms there are no existing resource consents issued where sections 124C(1)(c) or 165Z of the Resource Management Act 1991 (RMA) could apply if the project were to be applied for as a resource consent under the RMA.

Other considerations

Please see attached comments on the referral application from ORC (Appendix 1). These comments reflect ORC’s feedback on the current referral application and outline several matters to be addressed in a substantive application. ORC notes that it has provided comments on two previous iterations of this referral application. All comments in Appendix 1 relate only to the current referral application.

Appendix 1 - ORC Referral Application Comments

Consents Comments

A policy planning report has been provided by John Edmonds who has provided a high-level assessment of several relevant planning documents including:

- Otago Regional Council's Operative Regional Policy Statement (ORPS) 2019
- Otago Regional Council's Proposed Regional Policy Statement (pORPS) 2021

An assessment of the relevant provisions of the following regional plans has not been provided:

- Regional Plan: Water for Otago
- Regional Plan: Waste for Otago
- Regional Plan: Air for Otago

ORC has made the following comments on earlier iterations of this fast-track application, which continue to be relevant:

- Wetlands
 - Any wetland over 800m is a Regionally Significant Wetland. There are potential consent requirements under the Regional Plan: Water for activities in or near a Regionally Significant Wetland some of which are Non-Complying or Prohibited in the Regional Plan: Water. We have not been able to establish if there are any Natural Inland Wetlands within / near the project envelope, but note that the rules of the NES-Freshwater would also need to be considered if those are present
- Bores and dewatering
 - If temporary dewatering of groundwater from any excavations is required, consent would be required under the Regional Plan: Water for construction of a bore.
 - Depending on the nature of the dewatering (for example, the rate of take), consent for the taking of groundwater might also be required. If there were to be any long-term dewatering, consent for a bore (and potentially for a groundwater take) would similarly be required.
- Residential earthworks
 - Land use consent for the residential earthworks would be required.
- Contaminated sites
 - The powerhouse surrounds are identified as a HAIL site. Disturbance of a contaminated site would require Consent under the Regional Plan: Waste.
 - Historical mine tailings and races have been identified in the gully of One Mile Creek above the Lake Esplanade Road. The Fernhill Closed Landfill also falls inside the proposed development area. Given this, further investigation of contamination within the site is justified.
- Watercourses
 - Consent may be required for structures over watercourses (for example, a fibreglass boardwalk from the powerhouse up to midway clearing along one mile stream) under the Regional Plan: Water.

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- The Applicant indicated that there are no streams in the area of residential development but there are some gullies that potentially contain ephemeral waterways. Works in the streams, such as culverts, reclamation, diversions, and disturbance, would in most cases require consent.
- Conditions of Consent
 - ORC has a range of standard conditions that are typically applied to the consents outlined above. A copy of these standard conditions can be made available.

Natural Hazards Comments

The assessment provided identifies the main potential natural hazards present in the application site include; active faulting, landslide, rockfalls and debris flow.

No on-site investigations have been undertaken by the applicant, and commentary in the application is based on a desktop assessment of existing data sources (e.g. ORC regional-scale datasets, investigations for nearby sites, review of LiDAR and aerial imagery). Detailed geotechnical investigation is intended to be completed at a later stage, the scope of which ORC agrees is appropriate.

It is noted that future investigations are proposed to be carried out in a staged manner at scales from subdivision-wide scale down to a building site by building site scale, in order to inform geotechnical design. This is recommended to include an area-wide engineering geological mapping exercise, to be undertaken once forest clearance has been carried out prior to development.

The [NZ landslide planning guidance by GNS Science](#) (2024) provides a guide to the scope and level of detail recommended for a range of land-use decisions (e.g. plan change, landuse consent, subdivision, building consent), so can be used to critique the adequacy of the assessment. The current assessment by Geoconsulting Ltd is completed only at about a 'Level A' level of detail (e.g. a basic mapping of landslides and land potentially susceptible to landslide, but no information on landslide frequency or runout area etc). This guidance recommends that investigations of at least a 'Level B' detail are undertaken for plan change/landuse or subdivision consenting.

Science Comments

The application has been reviewed with a focus on the terrestrial species and ecosystems. It is noted that the application is sound, but requires detailed follow-up fieldwork and clear assessment of risks at the substantive application stage.

- It is recommended that any historical ecological surveys are updated to ensure they reflect the current conditions in the proposed work area. Field surveys should occur using suitability qualified personnel at the appropriate time of year and optimal conditions to enable better ecological management actions and ensure adverse effects are kept to a minimum.
- If wetlands are identified, avoidance of impacts should be able to be achieved through comprehensive planning, precise wetland mapping, and consideration of alternative tower locations, ideally guided by the Effects Management Hierarchy framework outlined in the National Policy Statement for Freshwater Management (NPS-FM 2020).
- Proposed monitoring as part of the application should include assessment of wetland condition (vegetation and soil) as an indicator of hydrological change.

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- Should monitoring identify adverse effects, a comprehensive wetland restoration plan must be developed and implemented.
- ORC notes that if the applicant needs help identifying wetlands in the areas of interest, ORC is happy to share the spatial information it holds.
- If naturally uncommon ecosystems are identified, avoidance of impacts should occur to prevent loss of ecosystem function.

Control of wilding pines and consideration of sanctuaries near the development would have benefit to indigenous biodiversity nearby the development.

Transport Comments

As per Land Transport Management Act 2003, ORC's responsibilities as the public transport authority for Otago include:

- Planning public transport networks
- Designing, procuring and funding public transport services; and
- Influencing land use via regional policy statements and regional plans developed in accordance with the Resource Management Act 1991.

ORC notes that this project would likely generate considerable transport demand. ORC Transport has assessed the Project's alignment with the following strategic planning and investment documents:

- Otago Regional Council Strategic Directions
- Otago Regional Public Transport Plan
- Proposed Otago Regional Policy Statement (pORPS)
- National Policy Statement on Urban Development (NPS-UD)

Integration of the Fernhill Heights suburb with sustainable transport modes

While the application includes a gondola to connect the proposed suburb to Queenstown Town Centre, we are uncertain whether the proposed Fernhill Heights urban form is sufficiently integrated with sustainable transport modes to provide good access between key destinations. We consider that the application may be inconsistent with the pORPS EIT-TRAN-P19 policy and the NPS-UD policy 1(c) on land use and transport integration. This should be considered in any substantive application.

It is unclear whether the application is in alignment with the pORPS UFD-P5 policy on the provision of commercial activities and community services. Due to no non-residential land use being present in the proposed suburb beyond the Fernhill Heights gondola station, people would have to travel longer distances to access work, education, shopping, health services and social amenities. In turn, walking and cycling would be less convenient relative to private vehicle travel. We assessed the integration of the proposed suburb across sustainable transport modes below with the assumption that most trips will require travel outside the proposed suburb. This should be addressed in any substantive application.

While the application makes effort to connect the proposed suburb to Queenstown Town Centre via a public transport gondola, we anticipate access to the Fernhill Heights gondola station will be

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impacted by the large area, steep topography, and non-linear layout of the suburb site. We would expect a walkshed analysis for the suburb/development be undertaken as a part of a substantive application to demonstrate the gondola effectively enhances the uptake of low-emissions public transport as per the pORPS EIT-TRAN-P20 and P22 policies. This should be considered in any substantive application.

The large area, steep topography, and non-linear layout would also challenge people in the proposed suburb to access existing public transport bus services. People travelling to existing bus stops on Fernhill Road would require at least 1km of travel with significant elevation change, which falls outside the standard walkshed for frequent public transport services. People connecting to the bus service on Lake Esplanade via the proposed gondola would require convenient access to the gondola from within the proposed suburb, as mentioned above. For both options, end-to-end journey times would need to be competitive with private vehicle travel to attract users and align with the pORPS EIT-TRAN-P20 and P22 policies. This should be considered in any substantive application.

Regarding public transport bus service expansion, ORC would not expect to be able to provide public transport within the proposed suburb as its urban form does not appear to meet the linearity, proximity and connectivity criteria set out in the Regional Public Transport Plan's LU P1 policy. ORC would also be challenged to provide services due to the suburb roads' steep grade and sharp corners.

Regarding active travel, ORC note the walkability the indicative footbridges provide. However, the large area, steep topography, and non-linear layout could also render active travel inconvenient and inaccessible in much of the proposed suburb. Despite the relative proximity of the proposed suburb to Queenstown Town Centre, the 200-500m elevation difference and indirect route is not conducive to walking or cycling.

ORC consider the provision of one carpark per dwelling would encourage reduced car ownership and the uptake of sustainable transport modes. However, these sustainable modes need to be attractive and easily accessible to ensure the proposed suburb meets the NPS-UD policy 1(c) criteria of a 'well-functioning urban environment'. The current proposal does not align with these requirements.

Bowen Peak shuttle service provision

The applicant does not provide sufficient information on the intended provision of a "frequent or on-demand shuttle services between the town centre and the site area" (Transport Assessment - Appendix 5). A detailed description of the service, a demonstration of its economic viability, and evidence of its effectiveness in reducing private vehicle demand and how it complements other sustainable travel modes (walking, cycling, and existing public transport) are required.

Integration of the Powerhouse Gondola into the public transport network

We would expect the proposed Powerhouse Gondola to be integrated into the wider transport network to encourage the trips generated from the proposed project to be completed using sustainable transport modes. This would include detailed coordination with the existing public transport network and potential future mass rapid transport systems. Aligning key components such as timetables, operating hours, infrastructure and ticketing systems would all be necessary to enable people using the proposed gondola to conveniently connect to other public transport services.

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We note that the public transport bus currently serving Fernhill does not have sufficient planned capacity to accommodate the additional demand that would be generated by the significant growth proposed. While an increase to 15-minute all day frequencies is scheduled for 2028-2030 as per the Queenstown Public Transport Business Case (subject to funding), we would not anticipate this capacity increase would accommodate an additional suburb of 3000+ people.

Powerhouse Gondola operating model considerations

We would expect a substantive application to provide greater detail on the Powerhouse Gondola's operating model, particularly if the applicant intended to seek publicly supported components for its procurement, financing, ownership and operations.

Impacts on the Queenstown transport network

We support the integrated transport assessment being undertaken as outlined in the application's Transport Assessment (Appendix 5) as a part of a substantive application. This assessment should include patronage modelling to determine whether the proposed Powerhouse Gondola would be expected to realise its high capacity and replace enough private car travel to mitigate the congestion effects of the development on the road network and to support climate change mitigation.

As noted above, residents of the proposed suburb would have to travel outside the wider Fernhill suburb to access most key destinations. While much of Queenstown Town Centre is within a 15-minute walking catchment of the proposed gondola's base station, many trips will remain outside this walking catchment, requiring use of the road network (via public transport bus service or private vehicle) to reach their destinations. As per 2023 Census data, 45% of Fernhill residents working or studying travelled outside the Sunshine Bay-Fernhill, Queenstown Central and Warren Park (1314 people) SA2 areas. Most of these trips would require use of SH6A, SH6 east, SH6 south and the Arthurs Point corridor, roads which already regularly experience capacity exceedances. Assuming similar commuting patterns for people living in the proposed Fernhill Heights suburb, the proposed project could generate 1350+ additional trips on these constrained transport corridors. While the proposed project would have less impact than urban developments directly adjacent to these corridors, the effects should still be considered and mitigated.

Policy Comments

ORC acknowledges the updated Policy and Planning Report dated 26 November 2025 and the additional information provided. The report presents a broad policy narrative and identifies areas of alignment with the ORPS and pORPS. In several instances, however, further analysis in the supporting technical reports would assist to substantiate the policy conclusions reached. This is discussed further in the assessment below.

Definitions

The application does not assess whether the proposal meets the pORPS definitions of nationally significant infrastructure, including rapid transit services, or regionally significant infrastructure, including ski area infrastructure. If the proposal qualifies under these definitions, the application should include a targeted assessment of how the infrastructure components achieve the relevant objectives and policies. This should address functional and operational need, integration with existing networks, climate resilience, and the management of environmental effects.

Areas of Alignment Acknowledged in the Applicant’s Assessment

ORC agrees that aspects of the proposal align with regional policy direction. The proposed pest management, wilding pine removal, and native revegetation within the Te Taumata o Hakitekura Predator-free Sanctuary, along with additional predator-free areas near Lake Whakatipu, are positive initiatives that contribute to indigenous biodiversity outcomes anticipated by the pORPS. The proposal also provides enhanced public access and recreation opportunities, which may align with RPS provisions recognising the social and economic value of recreation and tourism, and may support economic wellbeing objectives.

Urban Development

While the policy report summarises the NPS-UD and pORPS UFD provisions, it does not provide a targeted assessment of how the proposal gives effect to UFD-O1 and UFD-P4, particularly in terms of consolidated urban form and infrastructure integration. The assessment does not clearly reconcile enabling development with managing outward expansion, nor does it adequately address the proposal’s location outside the Urban Growth Boundary and priority development areas identified in the Queenstown Spatial Plan. A structured assessment addressing these matters is required.

Natural Hazards

The preliminary geotechnical assessment indicates that further investigations are required. The policy assessment does not identify the level of natural hazard risk as required by HAZ-NH-P2, determine the relevant risk category, or demonstrate how avoidance, remediation, or mitigation measures give effect to HAZ-NH-P3. Without detailed site-specific hazard analysis, it is premature to conclude that the proposal aligns with the natural hazard policy framework. A more robust technical and policy assessment is needed.

Outstanding Natural Landscape

The Patch Landscape report identifies moderate to high landscape and visual effects in parts of the site. This finding is not reconciled in the policy assessment, which continues to characterise effects as minor and contextually appropriate. The assessment does not adequately address cumulative effects, landscape capacity, or the requirement to protect ONL values under the pORPS and RPS, including the direction to avoid exceeding landscape capacity. A revised policy assessment should directly address these matters and acknowledge any tensions with the ONL policy framework.

Ecosystems & Indigenous Biodiversity

The ecological assessment provided is a high-level scoping exercise and identifies the likely presence of habitats of high ecological value. It does not confirm whether any areas qualify as Significant Natural Areas under the NPS-IB 2023 or pORPS, nor does it demonstrate how significant natural areas, taoka species, and ecosystems will be protected. The effects management hierarchy has not been clearly applied, and there is insufficient field-based information to support policy conclusions. Given the high-level nature of the ecology assessment, statements such as “no SNA identified” within the policy assessment are unsupported by detailed ecological survey information. ORC’s position remains that more ecological information is needed before a credible policy assessment can be made. A comprehensive ecological assessment, including detailed surveys and mapping, is required before a complete assessment against the NPS-IB 2023 and pORPS ECO provisions can be made.

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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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2. Please provide your comments on this application
<p><u>Summary of QLDC Comments</u></p> <p>The application is a re-lodgement, with amendments, of the earlier fast-track application (FTAA-2502-1025), which was declined by the Minister, with substantial concerns regarding the project's feasibility referred to in the Minister's decision. The feasibility of three-water infrastructure servicing, risks associated with natural hazards, a conflict with QLDC's Arterial Bypass, and the viability of the proposed ski field were identified as key reasons in the decision to decline.</p> <p>This current application seeks approval for an integrated gondola-based transport system, a large-scale residential development (approximately 1,333 units across 52 hectares), alpine visitor infrastructure, ecological restoration initiatives, and associated works across Ben Lomond, Bowen Peak and the Fernhill area.</p> <p>QLDC acknowledges that the revised proposal contains positive elements. These include the provision of additional housing supply (including a small amount of community housing and an intention for around 660 units (50%) to be 'workers accommodation'), ecological restoration initiatives including the removal of wilding pines, and the ambition to integrate housing, recreation and visitor experiences within a single master-planned framework. Notwithstanding these positive elements along with the additional application material provided since the previous application, significant concerns remain for QLDC with uncertainties in several critical areas.</p>

QLDC is unable to confirm that this development would have regionally (or nationally) significant benefits (in terms of the FTAA referral criteria) and this is of concern. Many of the claimed benefits are not to be realised until the end of the multi-decade staged implementation period (approximately 26 years). Further, the application is likely to generate significant adverse effects upon the environment and, the current level of information does not provide sufficient certainty regarding natural hazard risk, infrastructure servicing feasibility (transport and 3 water), landscape capacity, economic benefit realisation, and long-term implementation sequencing to confidently confirm that the statutory threshold of significant regional or national benefit has been met.

In particular:

- There is complete misalignment with QLDC's adopted spatial growth framework. The site is not within an urban area, is not identified as a Priority Development Area, and the proposal represents a departure from consolidated growth principles underpinning the Council Spatial Plan, Infrastructure Strategy and District Plan.
- The QLDC Housing and Business Development Capacity Assessment 2025 (HBA) notes:
 - That there is a shortage up to 2026 of 1000 dwellings in the district, constrained by infrastructure not zoning.
 - In the medium (up to 2033) and long term (up to 2053) the district moves into and maintains a surplus of dwellings.

The implementation programme provided for this development shows housing in the medium term (2030-2053) when the district will be moving into and maintaining a surplus of housing. Any benefit is considered to be moderate rather than transformational. Further a modest 5% of the housing is allocated to the Queenstown Housing Trust, and as worker accommodation is no different to residential use under the District Plan it is complex to enforce and monitor, and therefore not considered to be a benefit in terms of affordable housing options for workers in the district.

- Long-term infrastructure servicing (transport and 3 waters), maintenance responsibilities and funding pathways remain uncertain:
 - The proposal is reliant on the completion of the remaining stages of the Queenstown Arterial Route to alleviate effects of additional traffic generation. Funding for these remaining stages is not certain, and the applicant is not proposing to fund them for Council.
 - The site is outside of Council's current 3 waters servicing scheme boundaries and therefore required upgrades within the existing network to accommodate this development are not funded in the Long-Term Plan.
- The current natural hazard assessment is still preliminary in nature and does not meet the minimum level of investigation expected for a development of this scale and duration. A quantified risk assessment has not been provided, and uncertainty remains regarding landslide, rockfall, debris flow and slope instability exposure, particularly for the Fernhill Heights residential component, calling into question the feasibility of this development.

An assessment against the National Policy Statement for Natural Hazards 2025 is not included in the application, which is mandatory for a referral application.

- The economic evidence base has not been comprehensively recalibrated to reflect the revised proposal. While regional benefits may be capable of being generated, the magnitude, timing and net contribution of those benefits cannot be robustly determined on the currently available information.
- The development relies substantially on reserve land which require landowner approvals outside the jurisdiction of the FTAA. These landowner approvals for use of public land may require approval by QLDC Full Council (elected members) and public notification processes outside the control of the FTAA. QLDC will need to comply with its statutory obligations under the LGA.
- The proposal is located almost entirely within an Outstanding Natural Landscape identified through a public RMA process as having extremely limited capacity for urban expansion. The scale of development, extent of earthworks and multi-decade implementation programme introduce potential for significant landscape effects, with serious doubt regarding mitigation outcomes.
- The proposal seeks to drastically alter the unique and valued wilderness-like character and recreational experience of One Mile Reserve to establish a more formalised and commercial form of recreation currently only available within the Bob's Peak recreation reserve and Skyline Gondola. Thereby reducing the diversity of the District's valued reserve areas.
- Many of the claimed benefits are not to be realised until the end of the multi-decade staged implementation period (approximately 26 years). This would expose the district to the full extent of the potentially significant adverse effects with no assurances the claimed benefits can or will ever be realised.

FTAA Referral Criteria

The following and attached appendices constitutes QLDC written comments made in response to the invitation from the Minister under section 17(1)(a) and (3)(a) and (b) of the Act in relation to the application for referral of the Powerhouse project under the Fast-track Approvals Act 2024 (FTAA or Act).

Within the sub-sections below, QLDC also responds to the specific request made to QLDC under section 20 of the FTAA, which asks "whether the Council considers the project would have significant regional or national benefits, and in that context, whether the Council has any high-level comments on the project's alignment with any respective plans, policies or strategies".

S17(3)(a) - Competing Applications

QLDC is not aware of any applications that have been lodged with it that would be competing applications if a substantive application for the project were lodged.

S17(3)(b) - Existing resource consents to which Sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 would apply

QLDC is not aware of any existing resource consents relevant to this site or proposal where 124C(1)(c) or 165ZI would apply.

S17(1)(a) - Additional Comments

In providing written comment on the referral application, QLDC has considered the requirements set out in Sections 3, 10, 11, 13, 17, 21 and 22 of the Act.

Consultation

Consultation with QLDC prior to lodging a referral application is mandatory. Engagement to date with QLDC staff has been insufficient. Whilst efforts have been made by the applicant to consult with QLDC, the information the applicant was proposing to consult on did not appear to address Council's previous comments and concerns and therefore Council considered it was insufficient to constitute meaningful consultation until the applicant had completed preparing fulsome information to consult with. The Applicant outlined that they had completed their information gathering and sought consultation with Council in the lead up to and over the Christmas/New Year and early January periods, which was not able to be accommodated by Council given the time of year, pre-Christmas being the busiest period for processing resource consents and January being the time when many staff take extended leave over the Christmas break.

The applicant has subsequently chosen to lodge its referral application with no meaningful formal consultation with QLDC as required by Section 29 (1)(a) of the FTAA.

QLDC Technical Memorandum and Peer Reviews attached to these comments

The following technical memoranda have been prepared by expert internal QLDC staff which form part of QLDC's comments on this application. These have been used to inform the comments below and should be read in conjunction with the below comments -

- Transport, three-waters servicing, and other infrastructure matters –from Council's Property and Infrastructure team (attached as **Appendix A**)
- Council Parks and Reserves matters - from Council's Community Services team (attached as **Appendix B**)
- Planning Policy - from Council's Planning Policy Team (attached as **Appendix C**)

QLDC commissioned independent expert peer reviews which also form part of QLDC comments on this application, and these have been used to inform the comments below –

- Review of Natural Hazard Assessments for Powerhouse Fast Track Application – Prepared for QLDC by WSP (attached as **Appendix D**)
- Review of Economic Assessments for Powerhouse Fast Track Application – prepared for QLDC by Market Economics (ME) (attached as **Appendix E**)

- Review of Landscape Assessment for Powerhouse Fast Track Application – Prepared for QLDC by Boffa Miskell (attached as **Appendix F**)

Does Council consider the project would have significant regional or national benefits?

In summary, QLDC is unable to confirm that the proposed development would have significant regional or national benefits, and this is of concern. This is primarily because, as outlined in ME's economic peer review, the applicant's economic assessment prepared by Benje Patterson does not consistently revisit or re-quantify key assumptions to reflect the revised proposal. As a result, there are several areas where the evidence base remains incomplete or uncertain and, in some areas, overstated. This is substantiated in the ME peer review in Appendix E. In addition, QLDC does not consider the application demonstrates that the project is feasible (for reasons expressed in this comment), and that it is therefore not demonstrated that s 22 (2)(a)(ii), (iii) and (iv) would be achieved. The project also does not represent any of the other examples of significance in s 22(2)(a). More details on relevant aspects of the proposal, follow.

Supply of additional housing (s. 22(2)(a)(iii) and (iv))

The proposed Fernhill Heights suburb has been revised slightly since the original application declined by the Minister. The proposed suburb is located in the same location, however the typology of the proposed chalets has been updated, resulting in a total of 1,333 housing units (an increase of 293 residential units from previously sought), additional supply of housing to Queenstown Lakes Community Housing Trust 5%, and 50% allocation for key worker accommodation (however it is unclear how this is to be enforced and then monitored). ME are satisfied that despite these changes, the fundamental drivers of the Fernhill Heights economic assessment, remain broadly comparable to those identified in the original assessment.

In regard to the economic benefit of additional housing supply, ME note that while there is no dispute over the fact that the proposal would increase the supply of housing, whether this translates to material net benefit is predicated on the broader housing sufficiency context. QLDC has recently adopted the Queenstown Lakes District Council Housing and Business Development Capacity Assessment (HBA 2025) which provides a comprehensive assessment of housing demand alongside plan-enabled, infrastructure-serviced, feasible, and reasonably expected development capacity across the district. The HBA 2025 has not been considered within the application or supporting assessments. The findings of the HBA are that over the short-term (up until 2026) there is an overall shortfall of around 1000 dwellings, driven by infrastructure constraints, rather than a lack of zoned land. As set out in these comments (and appendices), this development will exacerbate infrastructure constraints because it is outside Councils 3 waters scheme boundaries and there is no funding for upgrades to those, plus no funding in place for transport network upgrades. Importantly, over the medium (up to 2033) and long term (2053) the district is expected to move into and maintain an overall surplus of dwellings. An FTAA Panel recently approved 2,800 homes in the southern corridor (Homestead Bay), located in an area covered by a Council Structure Plan and is a priority area for development in Councils Spatial Plan anticipating such development. While this housing was considered in the likely yield of the HBA, it is relevant to note the appropriate location of that FTAA project in an area planned for increased development by Council.

As stated in the applicant's indicative implementation programme, the delivery of housing as part of the proposed Fernhill Suburb is to be delivered progressively over 23 years from approximately 2030

to 2053. This would indicate that the delivery of housing would be within the medium and long term as described by the HBA 2025 where a surplus of housing supply is predicted. As such, considering this predicted surplus, ME expect that any benefit from the proposed housing would be small to moderate rather than transformational. Similarly, the provision of around 67 dwellings to the Queenstown Community Housing Trust (5% of the anticipated 1,333 total units) whilst supportive, remains modest relative to district-wide need and waiting list pressures for affordable housing. Further the provision of worker accommodation lacks certainty and clarity on how this will be enforced and monitored on an ongoing basis. Worker accommodation is no different to residential accommodation under the District Plan and to protect it through a condition of resource consent is complex in terms of legality and enforceability. Therefore in QLDC's opinion, the provision of worker accommodation should be afforded little weight in terms of an affordable housing option for workers in the district.

Economic Benefit of Precinct Component of Proposal (s. 22(2)(a)(iv))

The ME economic peer review concludes that, while the proposed retail and hospitality component could generate employment and visitor spending, the scale of economic benefit has not been demonstrated with a robust or internally consistent methodology.

The estimate of approximately 75 jobs from 3,000m² of floorspace is broadly reasonable and aligns with typical employment density benchmarks. However, the assessment relies on incorrect and outdated references to earlier housing and business capacity work when attempting to justify customer capacity assumptions and applies district-wide supply metrics in a way that does not logically translate to on-the-ground occupancy or trading capacity. As such, the projected customer numbers of the proposal have not been established by technically robust methodologies and cannot be relied upon.

Similarly, the projected annual retail and hospitality expenditure is derived from assumptions about visitor throughput, precinct capture rates and per-person spending that are indicative rather than evidence-based. The analysis assumes a high proportion of visitors would use the precinct and spend at a level consistent with a premium tourism market, but does not adequately consider behavioural factors, the competition with established commercial areas in Queenstown, or the likelihood of displaced (rather than new) spending. Importantly, the updated transport mode proposed as part of the development materially increases potential passenger capacity compared to the system originally assessed, yet the economic modelling has not clearly revisited the relationship between transport capacity, visitor numbers and the precinct's ability to absorb and service that demand. As a result, it is uncertain whether increased throughput would translate into higher net expenditure, or whether practical limits in floorspace and service capacity would constrain realised benefits.

Overall, while some economic benefit from the proposed powerhouse precinct is plausible, the magnitude and certainty of that benefit remain unclear, and the current analysis does not provide a sufficiently robust basis to conclude that the projected economic gains would be fully realised.

Visitor Expenditure and Net Economic Benefit (s. 22(2)(a)(iv))

The applicant's economic assessment by Benje Patterson, estimates substantial annual visitor expenditure associated with the ropeway and related activities. ME consider that while the use of a daily visitor spending benchmark is broadly plausible in the Queenstown context, the analysis implicitly assumes that most activity represents net new visitation to the district.

Given Queenstown's existing range of established attractions, including comparable alpine and gondola-based experiences, ME consider that it is likely that some proportion of demand would reflect substitution/displacement rather than genuinely additional visitor nights or spending. In that case, the figures presented would represent gross expenditure associated with the activity, not net additional economic benefit to the district.

In addition, concerns are raised by ME that the expenditure totals have not been translated into measures of regional GDP, value-added or employment through recognised economic modelling. As such, they do not account for displacement, leakage or the share of spending retained locally. This limits their usefulness in assessing the true economic contribution. As such, the contribution of visitor expenditure from the proposal as a significant regional or national benefits have not been established.

Feasibility of Development (s. 22(2)(a)(ii) and (viii))

As is outlined in these comments (and appendices) the concerns raised by QLDC in its comments on the original proposed development referral application persist in this current application, particularly regarding development outside the planned areas for development with the follow-on impacts to servicing transport and 3 waters infrastructure upgrades which are not currently forecast to be funded by Council. The reliance on Council to fund such upgrades where there is no certainty that it can, leaves the feasibility of the development highly unknown. This is compounded by the possible high risk to the development from natural hazards where there is no evidential support that the project will reduce risks arising from these. Without significantly more detail to establish certainty around feasibility, QLDC suggests that the development as it is currently presented may not be feasible.

Does the Project align with any respective planning documents, including spatial strategies? (s. 22(2)(a)(i) and (x))

While the proposal presents some positive contributions— in relation to additional housing, ecological enhancement, and the ambition to integrate multimodal transport—the Policy Planning assessment in Appendix C concludes that the project is not aligned with key national and district planning frameworks.

The project has not been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list.

A fundamental issue is the project's strategic misalignment. The site is located outside the Urban Growth Boundary and not within any Priority Development Area, placing it in direct conflict with the Grow Well Whaiora Spatial Plan, the QLDC Infrastructure Strategy, and the District Plan's consolidation approach to growth. Planned Council infrastructure investment does not anticipate development in this location, creating potential opportunity cost impacts for other high priority growth areas.

The assessment by John Edmonds & Associates provided in the application relies heavily on the proposed gondola to meet NPSUD objectives for accessibility, emissions reduction, and well functioning urban environments. However, the gondola's ability to operate as a reliable, integrated public transport mode is uncertain, dependent on long term delivery, and unsupported by clear

evidence. Many of the claimed benefits occur late in the development programme, with no guarantee they will materialise.

While the proposal includes a 5% Queenstown Lakes Community Housing Trust contribution and 50% worker accommodation, critical details are missing regarding affordability, tenure structures, pricing, and mechanisms to ensure long term retention of worker housing. There remains a significant risk that residential units could convert to visitor accommodation over time.

Environmental and hazard considerations also remain insufficiently addressed. It is a mandatory component of a referral application to assess the proposal against any relevant national policy statement and national environmental standard (clause 2(1)(a) of Schedule 5 of the FTAA). Key national policy instruments—specifically the NPS Freshwater Management and NPS Natural Hazards—have not been assessed despite steep alpine landforms, known hazard exposure, and potential effects on nearby waterbodies. The WSP peer review (Appendix D to these comments) concludes hazard assessment is not at a level consistent with the District Plan, regional policy statement, or industry standards. Importantly under the NPS NH if an area is subject to a high risk hazard then it is a requirement to avoid development in that area. Without understanding if the area is subject to high hazard risk results in lack of clarity regarding what areas can actually be developed on the site. Not understanding the areas that can be developed or not on the site calls into question any case that relies on said development as a reason for the project to be referred.

Overall, the proposal lacks sufficient information, presents significant strategic and policy misalignment, and does not demonstrate that effects on landscape, infrastructure, hazards, waterbodies, or urban form can be appropriately managed. From a Policy Planning perspective, the project does not meet the requirements of the FTAA or the policy framework that guides growth in the district.

Further Comment on Adverse Effects of the Proposal and the Information Gaps within the Application

The below comments are supported by the technical memorandum and peer review comments attached as appendices.

Natural Hazards and Geotechnical Risk

The applicant's geotechnical assessment is high level and does not meet the level of detail expected for a development of this scale. Key natural hazards—including landslide, rockfall, debris flow, seismic risk, and wildfire—have not been comprehensively assessed. The QLDC peer review by WSP (Appendix D) indicates that the site is likely prone to slope instability, but without detailed investigation the actual risk, required mitigation, and feasibility of development remain uncertain. This lack of information means the proposal cannot demonstrate consistency with national hazard policies or confirm that development can occur under the NPS NH restrictions or risks can be safely managed.

QLDC does not consider that the proposal will “reduce risks arising from natural hazards”, which is one of the matters the Minister can consider when considering whether the project has regional significant benefits in s 22(2)(a) of the FTAA.

Traffic generation and safety

The proposal is located outside planned growth areas and relies heavily on uncertain future stages of the Queenstown Arterial Route. The development would generate substantial additional traffic, yet no full Integrated Transport Assessment has been provided. The steep terrain, extensive road network needed, and winter ice issues create concerns around road safety, long term maintenance, and feasibility of vesting roads to Council. The gondola does not function as genuine public transport and is unlikely to offset private vehicle use. Overall, the transport effects are uncertain and potentially significant. Potentially significant traffic impacts on the Queenstown town Centre have the potential to impact on the success of Queenstown as a tourism attractor by reducing accessibility and movement in and around the town centre.

Overall, while the proposal incorporates transport infrastructure within the development, the strategic fit, funding certainty and effectiveness of mitigation measures remain unresolved. Without clearer alignment to planned growth areas, secured infrastructure delivery, and binding travel demand management measures, there is a material risk of ongoing adverse effects on the wider transport network.

Three Water Servicing

QLDC previously raised concerns about the feasibility of servicing the earlier iteration of the proposal, and this uncertainty was a key factor noted by the Minister when declining referral. The applicant has now provided a high level Servicing Feasibility Report; however, the report itself acknowledges that significant further investigation is required to understand network capacity, identify necessary upgrades and staging, and to clarify who would deliver and fund these works. QLDC's Property and Infrastructure Team has reviewed the report and considers that, until this detailed work is completed, the feasibility of servicing cannot be confirmed. As a result, the updated application does not resolve the earlier servicing concerns and remains premature.

For the Fernhill Heights residential area, servicing would rely on connecting to existing Council networks, but this depends on assumed capacity and unspecified future upgrades. The area lies outside current scheme boundaries and planned growth areas, and no funding exists for extending services. A scheme boundary adjustment would be required with a decision of full Council required on that, but approval has neither been sought nor guaranteed.

The Saddle Station proposes private, standalone water and wastewater systems, but their practicality and compliance require further verification. The Bowen Peak Upper Station requires minimal servicing, though insufficient information has been provided to confirm viability. The One Mile Powerhouse Reserve station may be able to connect to Council networks, but capacity and network effects still need confirmation.

Overall, the servicing information remains conceptual and incomplete. Before the proposal could be supported, the cumulative effects on three waters infrastructure must be fully understood, required upgrades clearly identified and staged, and all costs fully met by the developer. Without this certainty, the proposal risks imposing significant and unplanned financial and operational burdens on Council and the wider community.

Effects on landscape values of the Outstanding Natural Landscape (ONL)

The landscape assessment is preliminary and omits key information needed to understand the true extent of effects.

The site is located within a prominent Outstanding Natural Landscape (ONL), identified in the Western Whakatipu Basin Priority Area (PA) under the District Plan. Appendix G to these comments contains a copy of the Western Whakatipu Basin PA. Under the direction of the Environment Court, QLDC has in the last 3 years undertaken significant work to establish Landscape Schedules PAs within the PDP. The work to establish these schedules included a determination of the landscape capacity that each area has to absorb future development

The QLDC peer review by Boffa Miskell (Appendix F to these comments) indicates that the proposal is likely to generate significant adverse landscape and visual effects, given its scale, elevated location and the sensitivity of the ONL. Key details such as heights, earthworks, staging, and realistic mitigation have not been provided. The proposal would introduce a substantial new urban form into an area with extremely limited capacity for development, and effects are likely to be high and enduring.

Open Space and Recreation

As outlined above and within the technical memo from QLDC's Principal Parks and Reserves Planner, (Appendix B), while the proposal does present a number of benefits such as ecological restoration, trail creation and predator free initiatives, these come with major uncertainties around feasibility, long term management, and risk. Largescale vegetation clearance in steep terrain could cause instability and increased stormwater flooding hazards if poorly managed or resultant effects not mitigated. Many proposed benefits occur late in the development programme and are uncertain. In contrast, the proposal would significantly alter the existing valued wilderness-like character of One Mile Reserve by introducing commercial buildings and activities similar to those already found at Skyline, eroding unique community and visitor experiences.

Managers signoff



Fiona Blight

Manager Resource Consents Planning and Development
Queenstown Lakes District Council

27th February 2026

Technical Memo

To:	QLDC Resource Consent Team
From:	Robert Galvin (Programme Manager Growth Areas, P&I)
Date:	Thursday, 26 February 2026
cc:	
Subject:	Fast Track Approvals Act 2024, section 17 Comment Technical Memorandum, Transport and Three Waters Commentary (Powerhouse Fast Track Referral Application FTRA2601)

1. Executive Summary

- 1.1. This memorandum provides Property & Infrastructure (P&I) transport and three-waters input to inform Queenstown Lakes District Council's (QLDC) response under section 17 of the Fast Track Approvals Act 2024 (FTAA). The commentary reflects the proposal as submitted, and does not rely on assumptions, conditions, or infrastructure delivery mechanisms that have not been offered by the applicant.
- 1.2. From a transport perspective, the applicant indicates the development could proceed without the Queenstown arterial network, yet no assessment has been provided for this scenario. Prior assessments also relied on unsubstantiated assumptions of arterial delivery. Significant uncertainties remain regarding traffic generation, network performance, and safety, particularly at the One Mile intersection, and key feasibility matters relating to gradients, shading, and road geometry remain unaddressed.
- 1.3. From a three waters perspective, P&I opposes the use of capacity within existing infrastructure which is required for growth within the existing scheme boundaries. The application has failed to confirm three waters servicing feasibility but has identified a number of further assessments that will be required to confirm feasibility.

2. Qualifications and Experience

- 2.1. Robert Galvin is the Programme Manager (Growth Areas) in the Strategy and Infrastructure Planning Team of the Property & Infrastructure Department at QLDC. He holds an MBA, a Postgraduate Certificate in Business, is a Graduate of the City & Guilds Institute (GCGI) and is a Chartered Member of Engineering New Zealand (CMEngNZ). He has extensive experience in infrastructure programme and project delivery, asset management, procurement, and facilities management, and his role involves coordinating growth-related planning processes and integrating multidisciplinary inputs across Council's strategic and infrastructure planning frameworks.
- 2.2. Robert is not providing technical expert evidence; his contribution relates to the coordination, compilation, and presentation of material prepared by the technical experts Richard Powell, Tony Pickard, Monique Barnes, and Jeremy Martin.
- 2.3. Richard Powell holds a degree in Land Planning and Development from the University of Otago and has 17 years' professional experience in civil engineering,

including 15 years working within the Queenstown Lakes District. He is currently employed as the Infrastructure Development Engineering Manager at QLDC, a position he has held since 2019. His responsibilities include assessing how proposed developments can be serviced by existing and planned infrastructure, having regard to network capacity, known constraints, and programmed upgrade works.

- 2.4. Tony Pickard holds a BSc (Hons) in Estate Management from Reading University in the United Kingdom and has 20 years' professional experience as a planner, working across consents, policy, statutory advocacy, and infrastructure in New Zealand and overseas. He is currently employed as the Strategy Planning Manager (Transport) at QLDC, a role he has held since January 2018, and has been employed by the Council since 2014. His responsibilities include planning and investment for QLDC's transport improvements programme. He has been the transport lead for all urban centre master planning, spatial plans, structure plans, and complex transport business cases for approximately ten years, including the Queenstown Transport Business Case and the Queenstown Public Transport Business Case.
- 2.5. Monique Barnes holds a BSc in Civil Engineering from the University of the Witwatersrand in South Africa and has 12 years' professional experience across the private and public engineering sectors. Her experience includes transport planning and design, road geometric design, multimodal infrastructure planning and design, preparation of integrated transport assessments, transport modelling, and Safe System Audits. She is currently employed as the Senior Transport Engineer in the Property and Infrastructure Civil Engineering Team at QLDC. Her responsibilities include technical assurance of transport projects across the district and ensuring that new infrastructure aligns with Safe System principles.
- 2.6. Jeremy Martin holds a NZ Diploma in Engineering from the Western Institute of Technology at Taranaki and is a Chartered Member of Engineering New Zealand (CMEngNZ). He has 18 years' professional experience in civil engineering, transport, and roading infrastructure, working across Central Otago and the Queenstown Lakes District. He is currently employed as the Senior Network Engineer (Transport) in the Strategy and Infrastructure Planning Team of the Property & Infrastructure Department at QLDC. His responsibilities include maintaining a strategic overview of the QLDC and adjoining transport networks.
- 2.7. The technical authors confirm that they have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. The technical commentaries have been prepared in accordance with that Code. Unless stated otherwise, the opinions expressed are within the respective authors' areas of professional expertise, and no material facts have been omitted that might alter or detract from those opinions.

3. Introduction

- 3.1. This memorandum provides targeted transport and three-waters commentary to support QLDC's response to the Expert Panel under section 17 of the FTAA for the Fast-Track Referral Application for the Powerhouse Project (FTRA2601).
- 3.2. The advice is framed in the context of QLDC's adopted strategies, Long Term Plan (LTP) commitments that are subject to potential change, and growth sequencing assumptions, and is intended to inform, rather than determine, QLDC's overall position on the referral application.
- 3.3. In preparing this feedback, QLDC has reviewed the referral application materials that are relevant to transport and three-waters infrastructure. These include:

- Appendix 3 – Three Waters Servicing Feasibility Report
- Appendix 5 – Transport Assessment
- Appendix 22 - Fernhill Heights Subdivision Releases & 3D Road Network Plans
- Appendix 27 – ORC Comments

4. Strategic Context

4.1. QLDC's consideration of the proposal occurs within the context of the following:

- Planned and designated transport infrastructure, including the Queenstown Arterial programme, noting that its future staging and delivery remain uncertain; and
- Existing and planned three-waters networks identified in the LTP, which have been designed to service established growth areas and may not have capacity to accommodate unplanned or out-of-sequence development.

4.2. Infrastructure provision for a development of this scale must be aligned with Council's adopted growth strategies and sequencing. It should not rely on unprogrammed upgrades or Council funding that is unapproved or subject to change.

4.3. Infrastructure considerations must be assessed in the context of existing network capacity, agreed levels of service, funding availability, and growth sequencing. Where information is incomplete, untested, or indicative only, Council's ability to provide assurance on the feasibility or deliverability of required infrastructure is correspondingly limited.

5. Transport Commentary

5.1. Overview

- The Queenstown Arterial Route was conceived to support long-term growth within the Town Centre and surrounding suburbs, as outlined in the *2017 Queenstown Town Centre Masterplan Programme Business Case*. Its purpose is to provide an alternative to constrained town centre streets, improve network resilience and safety, support mode integration, and enable significant urban regeneration and intensification.
- The subject site, located on Rural Zoned land within an Outstanding Natural Landscape (ONL) and outside the established Fernhill "urban" area, is not part of any identified growth area, nor is it intended for future urban development.
- Large-scale developments now emerging in the wider Queenstown urban area, including Lakeview and associated brownfield and greenfield development in Thompson Street and Fernhill, are the outcomes envisaged when the arterial network was planned. As the subject site is not planned for development, given its landscape character, topography and zoning, the Powerhouse proposal is not consistent with, nor complementary to, Council's strategic transport objectives.
- The proposed gondola is not public transport. Its function is to provide access into the apartments and, in future, access further up the mountain.

The gondola station serving the development is located too high up the hill to provide a practical commuter or public transport option for the wider Fernhill suburb. It therefore does not contribute to Council's mode-shift or public transport integration objectives.

5.2. Arterial Staging and Network Priority

- Some pre-implementation phases of the remaining stages of the Queenstown Arterial Route are currently included in the LTP from 2029 onward. These timings will be reconsidered as part of the three-yearly LTP review in 2026/27, so they cannot be confirmed at this stage. The wider project is not funded.
- Abley's traffic assessment for the applicant relies on the fact that QLDC and NZTA will construct the remaining stages of the Queenstown Arterial Route, to demonstrate that transport network issues that would arise from the proposal can be appropriately alleviated / mitigated.
- The work and funding required to deliver the remaining stages of the Queenstown Arterial Route, relied on by the applicant as alleviating effects of the Powerhouse proposal, are significant. Although the full arterial route is already designated and consented through the COVID Fast Track process, and with Stage 1 and the Lakeview sections completed more than 50 percent of the route is now built, the remaining stages still require detailed design and funding for delivery. These include Stage 2 connecting Gorge Road to Memorial Street and Stage 3 completing the route from Thompson Street to the One Mile roundabout. While the route is committed in planning terms, its completion is not currently funded.

5.3. Development Scale and Network Implications

- Traffic volumes associated with development of this scale will be significant. Accordingly, the proposal should not rely on QLDC delivering network-level infrastructure ahead of development.
- The development should instead provide a scalable level of support for strategic transport infrastructure that responds to cumulative growth effects if it were to be supported.
- Network interventions as a result of this proposal, should it progress, should also be capable of integration with the ultimate arterial configuration.
- Robust multi-modal modelling needs to be undertaken to assess the effects on the wider network. While we are supportive of the potential for integrated transport proposed in the referral application, there remains potential for significant network effects and for continued reliance on private vehicle use, both of which need to be assessed and managed.
- If the proposal were to proceed it should deliver a comprehensive, enforceable Travel Demand Management (TDM) package as a core mitigation measure. This must include mandatory behavioural TDM from commencement, delivery of all site-specific infrastructure required to enable mode shift, strict controls on parking supply and car access, and ongoing monitoring with corrective actions. Acceptance of traffic effects should be explicitly contingent on the delivery and performance of these

TDM measures, rather than reliance on future Council or third-party interventions.

- As recommended in the preliminary Transport Assessment from Abley, residents and visitors should be encouraged to use sustainable transport modes. If the project is referred, parking management must be carefully considered in the integrated transport assessment that will support any substantive application. There is a risk that the Fernhill Heights station car park could increase reliance on private vehicle use. Priority should be given to accessible parking at the station to limit traffic impacts.

5.4. Road Design and Effects

- No Integrated Transport Assessment has been provided in support of the application to enable a robust assessment of effects. The elevation of the proposed transport network is likely to have significant implications for road safety and operational performance. This presents a potentially significant safety and operational issue, especially given the steep terrain and winding geometry of the proposed roads. More information is required to assess the feasibility of the road layout and its compliance with relevant standards.
- Pedestrian and cycle linkages need to be prioritised over vehicle access to the Fernhill Heights station from within the proposed development to reduce reliance on private vehicles and minimise associated traffic effects. These should be designed to current best practice, with preference for separated cycle facilities rather than shared paths. QLDC has concerns, given the steep terrain, that there will still be a reliance on motorised vehicles to access the station. The Urban Intensification work undertaken for the Queenstown CBD identified that areas located partway up Queenstown Hill are already considered not accessible in the context of the NPS Urban Development due to steep grades and walking times that exceed acceptable accessibility thresholds. As the Powerhouse site is located at significantly higher elevation than those areas, it is unlikely that walking or cycling between the CBD and the development would be realistic for most users. This reinforces the need for the applicant to demonstrate how the development will minimise reliance on private vehicles and ensure access is safe and feasible for pedestrians and cyclists.
- Pedestrian and cycle networks should include appropriate lighting to enable safe use at night and encourage active travel.
- It is currently unclear whether the proposed roading will meet QLDC requirements for waste collection in this constrained environment. In addition to demonstrating that the QLDC Code of Practice check-vehicle requirements can be met, any future substantive application should outline the waste collection strategy and demonstrate how rubbish trucks will safely access and service the development.

6. Three Waters Commentary

6.1. Overview

- The proposed development is located outside QLDC's existing water supply, wastewater, and stormwater scheme boundaries. These schemes were not designed or funded to service development of this scale 'out of scheme boundary', and no LTP funding is available to provide additional capacity.
- Although the development is proposed to occur over an extended period, which in theory could allow QLDC to plan and deliver additional capacity, it would accelerate the need for major network upgrades and would compete for funding with other planned growth areas within the scheme boundaries. There is no guarantee that QLDC could deliver the required upgrades in line with the development's staging.
- While there may be some existing capacity in the networks currently, this capacity is required to accommodate growth within the existing scheme boundaries and is not available for this unplanned development. Additional development of this scale will require significant upgrades that have not been identified within the application. Allocating these upgrades within the LTP would result in their costs being spread across all developments paying Development Contributions within the catchment, despite these upgrades being triggered or required by this proposal. A decision from full Council would be required to approve any LTP funding for required upgrades. Therefore, the required upgrades should be identified, confirmed to be feasible, fully developer funded, and potentially constructed as a part of this development proposal if referred.

6.2. Servicing Principles

- From a water supply, wastewater, and stormwater perspective, any support for the proposed development is contingent on servicing solutions being demonstrated as appropriate and technically feasible, ensuring they do not compromise the levels of service for existing users or create unfunded obligations for QLDC.
- The Three Waters Servicing Feasibility Report submitted with the application concludes that further work is required to address these principles. Sections 6.1, 6.2, 6.3, and 6.4 of that report outline the minimum work needed to fully understand effects, confirm network upgrade timing, and clarify responsibilities for servicing this development. The application is therefore considered premature.

6.3. Network Capacity and Integration

- The proposed development includes residential and transportation station components, each with different servicing requirements. Commentary is provided for each element below.
- *Fernhill Heights*
 - It is proposed that the residential component known as Fernhill Heights will be serviced via the existing QLDC reticulated infrastructure that currently serves the existing residential area downslope of the development.
 - The Three Waters Servicing Feasibility Report outlines concept-level servicing solutions for water supply, wastewater, and stormwater disposal. These concepts rely on utilising existing network capacity and on QLDC providing incremental upgrades as development (and broader growth) occurs within the catchment.

- The Three Waters Servicing Feasibility Report identifies the further work required to confirm feasibility, including determining required upgrades and their staging triggers. Servicing of this development is not considered feasible until this work is complete and therefore the application is premature. If work is done to confirm feasibility all funding and, if necessary, construction of any required upgrades should be the sole responsibility of the developer and secured through conditions of consent or a developer agreement should this development proceed to the substantive stage.
- Servicing the development would also require an adjustment to the scheme boundary to include the development area. It is important to note that a scheme boundary adjustment of this scale would require approval from Council (Councillors) and that approval is not certain at this time as no approval in principle has been sought prior to lodging this referral application.
- *Saddle Station*
 - Saddle Station is proposed to be serviced independently, with water supply from rainwater harvesting and onsite wastewater disposal. As this will be a private standalone system, no comments are required from a network capacity perspective.
 - The feasibility report identifies further work required to confirm the details of these solutions, which should be completed prior to referring this application to confirm feasibility.
 - Stormwater is also proposed to be managed onsite.
- *Bowen Peak Upper Station*
 - Only minimal servicing is proposed for this station, and it would not appear to add demand to any three waters networks.
 - The feasibility report identifies further work required to confirm the details of the proposed solutions, which should be completed prior to lodging a substantive application should this application be referred.
- *One Mile Powerhouse Reserve*
 - It is proposed that this station be connected to existing QLDC water supply and wastewater reticulated networks. Based on the scale and projected demands, there is likely to be sufficient capacity to accommodate this component. However, this must be confirmed.
 - The feasibility report identifies further work required to confirm the servicing details, and this work should be completed prior to a substantive application being lodged should this application be referred.

6.4. Growth and Cumulative Effects

- To ensure that cumulative growth effects on the three-waters networks do not result in QLDC funding upgrades triggered by this development, over and above the growth upgrades already provided for in the LTP, all required upgrades and their trigger points must be clearly understood. If this application is referred these upgrades should be conditioned to ensure the developer covers their costs and, and where required, constructs them in line with development staging.

7. Further Information

7.1. Further Information and Conditions Required should this application be referred:

- **Transport**
 - Completion of a detailed Integrated Transport Assessment, incorporating all interventions and mitigation measures recommended in the Abley transport report.
 - Design of all transport elements in accordance with NZTA Pedestrian Network Guidance, alongside compliance with the QLDC Code of Practice.
 - Provision of dedicated walking and cycling infrastructure to minimise conflicts between pedestrians, cyclists, and vehicles, particularly given the challenging terrain.
 - Preparation of a Concept Design Safe System Audit for the proposed transport network.
 - Inclusion of more detailed information on the proposed road network now prior to any potential referral, including long sections and cross-sections, to enable a full understanding of the road environment. While this may be considered granular for the referral stage, if the proposed roads are not safely traversable in winter that materially affects the fundamental ability for the proposal to be successfully implemented. As such information should be provided to confirm that the fundamental road network proposed is constructable, safely traversable in winter conditions and can be designed and constructed in accordance with Council standards to ensure safety and the ability to maintain reasonably.
- **Three Waters**
 - Completion of the further work outlined in sections 6.1, 6.2, 6.3, and 6.4 of the Three Waters Servicing Feasibility Report, to fully understand feasibility and the effects on the three-waters networks and identify required upgrades and their timing.
 - All upgrades required or triggered by the proposal must be funded, and where necessary constructed, by the developer at the time they are needed.

8. Conclusion

- 8.1. There remains an absence of assessment in the updated referral application for the non-arterial scenario and unresolved safety, network performance, and feasibility issues outlined above.
- 8.2. From a three waters perspective, servicing feasibility has not been demonstrated, and the proposal relies on existing infrastructure required to service growth within current scheme boundaries that cannot be used for the proposed development.
- 8.3. The matters set out in this memorandum are intended to inform QLDC's section 17 response and clearly articulate the infrastructure-related expectations associated with any support for the referral.

Technical Memo

To:	QLDC Resource Consent Team
From:	Jeannie Galavazi QLDC Principal Parks and Reserves Planner
Date:	Thursday, 26 February 2026
cc:	
Subject:	Fast-Track Approvals Act 2024 Powerhouse Project: Referral Application (FTRA2601) Parks and Reserves technical comment

1. EXECUTIVE SUMMARY

- 1.1. This memorandum provides QLDC Parks and Reserves (P&R) input to inform the Queenstown Lakes District Council's (QLDC or Council) response to the Minister under s17 of the Fast-track Approvals Act (FTAA) for the Powerhouse Project referral application by Bowen Peak Limited.
- 1.2. The referral application is for a development on Bowen Peak, Queenstown including an aerial transport system, construction of up to 1,333 residential units, creation of a recreation park (including ski and mountain bike facilities), wilding pine clearance, ecological restoration and establishment of predator free sanctuaries (proposal).
- 1.3. The proposal would utilise a substantial amount of QLDC recreation reserve land and the application has not demonstrated how the significant impacts upon the existing reserve land and its uses will be avoided, remedied, mitigated or offset. The occupation of the reserves with buildings and large-scale infrastructure will result in significant adverse effects upon the natural and recreational values of the reserve land.
- 1.4. Insufficient information has been provided in relation to the feasibility of establishment, ongoing maintenance and management requirements of parts of the proposal. It is possible that many of these long-term costs will be imposed upon ratepayers. Insufficient information has also been provided regarding the potential environmental benefits and adverse effects of the proposal, particularly around the development and increased patronage within the lower One Mile reserve and the upper sensitive alpine environment.
- 1.5. The proposal includes development and use of a number of QLDC reserves, and this will require additional written agreements or approvals from the QLDC outside of the FTAA process prior to lodging any substantive application (if the referral is approved). There is no certainty that these agreements or approvals will be granted by the QLDC, and the FTAA referral process has not allowed sufficient time for discussion of these matters with the Councillors to ascertain their views on this matter.

2. INTRODUCTION

- 2.1. QLDC has been asked to provide comment on a referral application for a proposed development between One Mile Reserve and Bowen Peak, Queenstown comprising an aerial transport system, construction of up to 1,333 residential units, creation of a

recreation park, wilding pine clearance, ecological restoration and establishment of predator free sanctuaries.

- 2.2. The purpose of this memo is to provide the P&R team's feedback on the proposal with regard to the effects of the proposal upon the QLDC administered reserve land. It is understood that this feedback is to be incorporated into the QLDC's formal response to the Minister.
- 2.3. P&R input is required in both its landowner and Requiring Authority capacities. This is because the proposal would impact a number of QLDC reserve parcels as well as land subject to existing designations included in the Proposed District Plan. Reserves are proposed to accommodate a number of commercial buildings, aerial transport stations and pylons. Other works proposed within the QLDC administered reserve land include the removal of wilding pines, native planting, extension of trails and establishment of a predator-proof fence.
- 2.4. Much of the proposed development (Powerhouse Station, Fernhill Heights Station, Saddle Station, a number of pylons and trails) is also to be located within the Department of Conservation (DoC) administered reserve which forms the upper areas of Ben Lomond and Bowen Peak, and it is understood that DoC will also have the opportunity to provide a response to the referral application. Consequently, the P&R feedback is primarily focused upon the impacts of the proposal upon the QLDC administered reserve land, however additional comments are made with regard to the Ben Lomond Saddle component of the proposed development given the QLDC's land management role of the tracks and the local open space network in this area.

3. QUALIFICATIONS AND EXPERIENCE

- 3.1. This report was prepared by Jeannie Galavazi, Principal Parks and Reserves Planner at QLDC.
- 3.2. I hold a Bachelor of Parks, Recreation and Tourism Management from Lincoln University. I have 25 years of professional experience. I have been a Parks and Reserves Planner at QLDC for nearly 11 years where responsibilities include authoring key Parks Strategies and Plans, presenting expert evidence at the Environment Court on behalf of QLDC and the assessment of development proposals and effects on the reserve and recreation network.
- 3.3. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical report has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

4. BACKGROUND

- 4.1. The Applicant lodged a previous referral application in 2025 which incorporated the installation of two funiculars, construction of a commercial area at One Mile Reserve consisting of retail, hospitality, tourism offerings and a conference facility as well as 270 chalets providing 1,040 residential units.
- 4.2. This referral application was declined by the Minister based on insufficient information being provided with regards to the project's feasibility in relation to servicing, natural hazard risks, viability of the ski field and a conflict with the QLDC's arterial bypass road.

5. PROPOSAL

5.1. The relevant parts of the proposal for this memorandum are now outlined in more detail.

5.2. An aerial transport system comprising three contiguous aerial ropeways, pylons and associated stations across QLDC and DoC administered reserve land, as well as Ben Lomond Station as follows (and as shown on Figure 1 below):

- a. A gondola connecting the One Mile Reserve to the proposed residential development, the upper predator-free sanctuary and recreation access.
- b. A funifor commencing from the gondola and extending to the Ben Lomond Saddle providing access to the recreation park.
- c. A gondola from the Ben Lomond Saddle to Bowen Peak providing further access into the recreation park which is for the proposed Bowen Peak Ski Area and mountain biking.

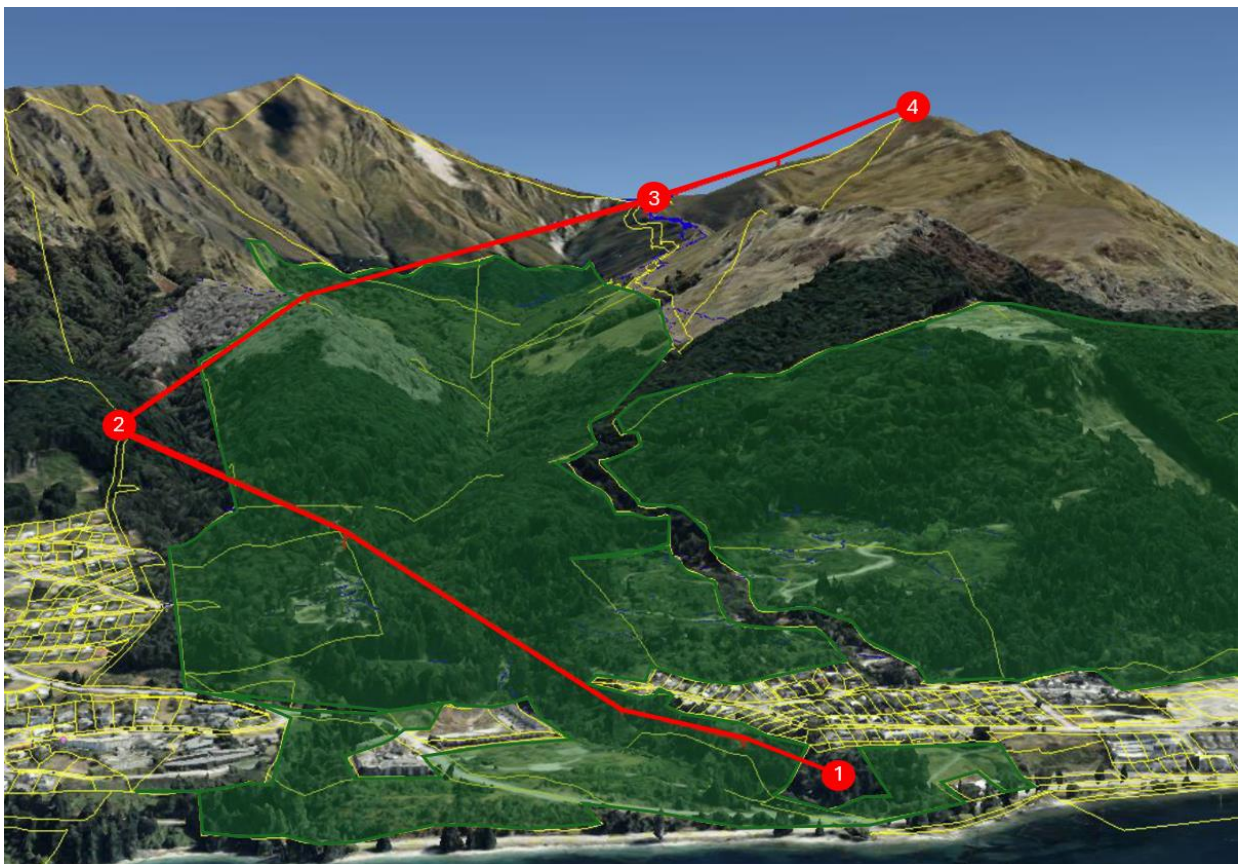


Figure 1: Approximate location of aerial transport system (red), QLDC reserve land (green shading) and gondola stations (#1 Powerhouse station, #2 Fernhill Heights station, #3 Saddle station and #4 Bowen Peak station).

5.3. The proposed residential development incorporates 175 chalets comprising up to 1,333 housing units. 5% of the housing is to be provided to the Queenstown Lakes Community Housing Trust (QLCHT) and 50% is to be designated for worker accommodation all to be located on private land.

5.4. The proposed creation of a recreation park and environmental improvements to include:

- a. The establishment of a new 86ha ski area and mountain bike area on Bowen Peak (the 'recreation area'). The ski area is proposed to accommodate up to 700 skiers per day (possibly partially on QLDC reserve land).

- b. Establishment of two predator-free sanctuaries. One 3ha sanctuary within the One Mile Reserve (QLDC reserve land) and the other 290ha sanctuary spanning the One Mile and Two Mile Creek valleys (we assume these will encompass QLDC reserve land).
- c. Removal of 400ha of wilding pines with native planting including within the QLDC reserve land.
- d. Repair and upgrade of the existing One Mile Creek track including installation of a bridge and boardwalk within the QLDC reserve land.
- e. Formation of a new mountain bike trail from Bowen Peak to the One Mile Reserve (partially within the QLDC reserve land).
- f. Formation of a new predator free sanctuary perimeter track.

5.5. There are a number of proposed commercial buildings as follows:

- a. Establishment of a retail, hospitality and tourism precinct within the One Mile Reserve (QLDC reserve land).
- b. Construction of a community hub building adjacent to the residential units on private land.
- c. Two storey bar/restaurant, retail and guest services at Ben Lomond Saddle incorporating retail, restaurant/café, a 30-bed bunk rooms, a public shelter and public toilets.
- d. Public viewing platform, shelter and toilets on the western face of Bowen Peak.
- e. Allowance for a possible future conference centre and multilevel carpark within the One Mile Reserve (some within the QLDC reserve land).

6. CONTEXT

6.1. The QLDC administered reserves relating to the proposal are shown shaded in green in Figures 2 and 3 below.



Figure 2: Approximate aerial transport system location (red) in relation to the QLDC reserve land parcels (green shading)

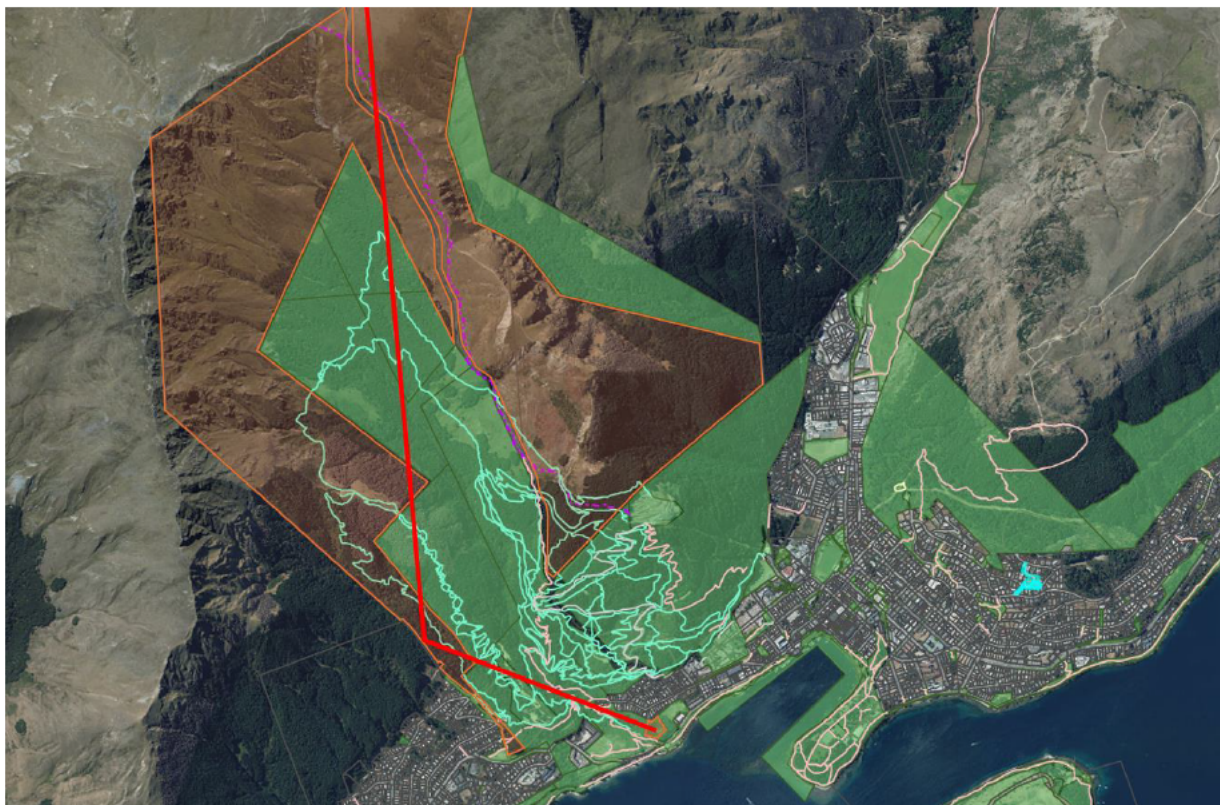


Figure 3: Aerial showing approximate location of QLDC reserve land (green shading), DOC land (orange shading), existing trail network, Ben Lomond Track (purple) and aerial transport system (red)

6.2. The proposal includes development on the following land parcels that are Council administered reserve land (this is not a complete list of all land parcels on which the development is proposed). All of the below parcels are covered by the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan:

Name	Legal description	Classification	Area	Purpose
One Mile Reserve	Section 1 Survey Office 24350	Recreation Reserve	1.06ha	Functions as the entranceway to the area known as 'One Mile'. Provides carparking and access to the historic One Mile Powerhouse and One Mile walking track (currently under repair).
Ben Lomond Reserve	Part Section 110 Block XX Shotover Survey District	Recreation Reserve (contains historic heritage feature 'Queenstown Powerhouse')	129.3ha	Contains the One Mile Powerhouse, an extensive trail network for mountain biking, and many trails within the Ben Lomond and Wynyard Bike Parks. Has a popular rest area known as 'Midway Clearing' for bikers within the Ben Lomond Bike Park. Also provides valuable pedestrian connections linking Fernhill to the Queenstown CBD.
Wynyard Jump Park, Ben Lomond Reserve	Part Section 105 Block XX Shotover Survey District	Commonage Reserve	7.1ha	Contains the Wynyard Jump Park and other multi-use trails, leased and maintained by the Queenstown Mountain Bike Club (QMTBC).
Ben Lomond Reserve	Section 4 Block I Mid Wakatipu Survey District	Water Supply Reserve	41ha	Contains the upper trails within the Ben Lomond Bike Park, and walking

				trails (Ben Lomond Track and Fernhill Loop). Part of the alpine environment.
Ben Lomond Reserve	Section 10 Block I Mid Wakatipu Survey District	Water Supply Reserve	39.5ha	Contains the multi-use trail known as 'Fernhill Loop' and other mountain biking trails primarily accessed by the Wynyard Bike Park (pedal up only). Provides a link trail to access the Ben Lomond Bike Park. Part of the alpine environment.
Ben Lomond Reserve	Section 14 Block I Mid Wakatipu Survey District	Water Supply Reserve	16.8ha	Contains the Fernhill Loop and a few mountain biking trails. Part of the alpine environment.
Ben Lomond Reserve	Section 19 Block I Mid Wakatipu Survey District	Water Supply Reserve	46.4ha	Contains the Fernhill Loop and biking trail 'Beeched As'. Part of the alpine environment.
Ben Lomond Reserve	Section 1 Block VIII Mid Wakatipu Survey District	Water Supply Reserve	23.7ha	Contains a couple of mountain biking trails near the Ben Lomond Saddle. Part of the alpine environment.
Ben Lomond Reserve	Section 2 Block VIII Mid Wakatipu Survey District	Water Supply Reserve	8.2ha	Does not contain any trail infrastructure. Part of the alpine environment.

6.3. In general, the QLDC manages reserves in the Queenstown Lakes District in accordance with Section 17 of the Reserves Act 1977 in order to protect the environment and provide local communities and visitors to the District with easily accessible spaces to enjoy a variety of sport, recreation and community activities, such as, but not limited to, organised sport, events, walking, running, cycling, and dog walking. Many QLDC reserves also provide access, connection, and interaction to waterways and the lakes and rivers (blue network) and provide for biodiversity and ecological restoration. Due to the topography of the District, high visitor numbers and an active resident population, reserve land is well utilised and faces increasing pressure from competing uses.

6.4. Reserve land is highly sought after for use by community groups, clubs and large events, as well as commercial recreation businesses. QLDC receives a high volume of requests to develop and/or occupy reserve land for a variety of purposes. However, due to the topography and the high residential and visitor growth within the District, QLDC administered reserve land is a limited resource with the high cost of land making it difficult and often unfeasible for QLDC to acquire additional reserve land. As such it is critical that public reserve land is protected for its intended purpose, for existing and future generations.

7. ASSESSMENT

Benefits of the proposal

7.1. The potential benefits of the proposal include the removal of wilding pines, implementation of native planting areas and establishment of predator-free areas on some QLDC administered reserve land, as well as improved recreational access into the QLDC and DoC administered reserve land. However, insufficient detail and information is included within the referral application to ascertain the scale of these benefits, whether these benefits will be realised and if there will be undue burden imposed upon the QLDC ratepayers for the ongoing management or maintenance of the reserve land.

7.2. The proposal also could generate revenue for the QLDC through the concessions that would be required for the use of the QLDC administered reserve land, however no

specific details in relation to this are included in the application and it is therefore difficult to ascertain the scale of this potential benefit. Further, it is noted that the project is described as not-for-profit in some parts of the application and consequently the ongoing funding mechanisms for the ongoing concession payments and management of the project is difficult to determine.

- 7.3. The referral application states that 400ha of wilding pines are to be removed as part of the proposal, however the location and extent of this tree removal is not further detailed in the application. QLDC has received a request to sign a licence to occupy from the applicant outside of this fast track application for removal of trees on QLDC reserve land however no agreement has been entered into at the time of writing of this report. This correspondence is attached as Appendix 1. QLDC has informed the applicant that:

'The works are proposed over a large parcel of public recreation reserve with steep topography and a sensitive receiving environment. A licence is not the correct mechanism for approval as this type of work would be a contractual arrangement. As Council and landowner of public land, we are a PCBU and, as such, cannot simply licence this type of complex operation to a third party.'

- 7.4. Wilding and other pest species removal is supported, however further information needs to be provided, including details for how the cleared area will be maintained free of wilding species and details of who is expected to be responsible for this ongoing maintenance and associated costs. The extent of removal also needs to be specified so to gauge the scale of this benefit. Furthermore, no expert reporting has been provided regarding the feasibility, access and effects of tree removal within the reserve land in terms of ongoing land stability / possible debris flows, rockfall, sediment discharge, animal and plant pest control, changes to stormwater flows and impacts upon recreation access. Removal of trees elsewhere on Ben Lomond has been complex and has shown that the adverse effects of tree removal within this area can be significant if not well managed.
- 7.5. An additional benefit of the wilding removal could be the reduced wildfire risk within the QLDC reserves as well as on Ben Lomond as a whole. At present, this area is part of a fire risk 'red zone' and there is a total, year round fire ban for the area shown in Figure 4 below. Removal of the wilding pines across the hillside could be a benefit depending upon the scale of removal that is proposed and the success of the native revegetation.

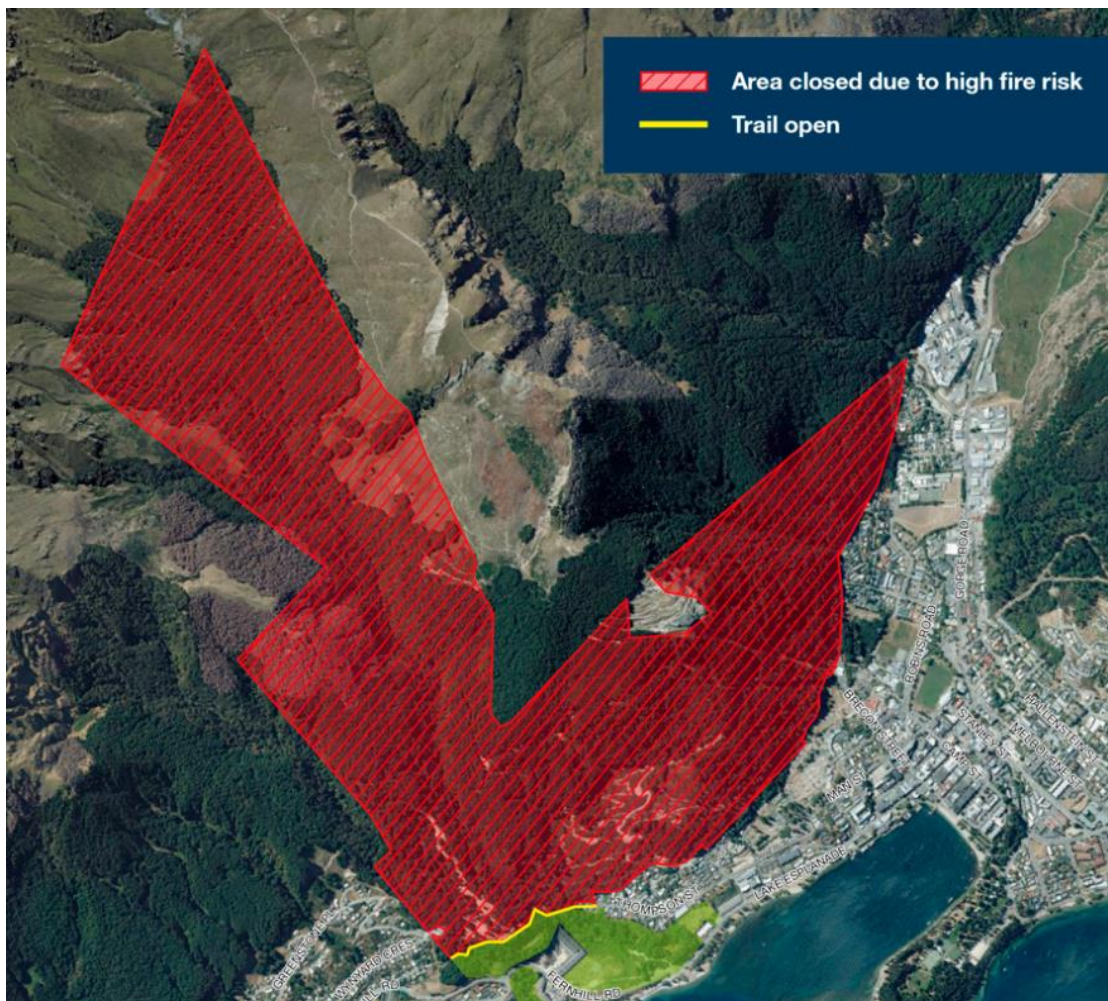


Figure 4: Area of Ben Lomond Recreation Reserve that is the 'red zone' fire risk area which is closed when there is high wildfire risk (Source: QLDC website)

- 7.6. The planting of additional native species within QLDC reserve land could potentially be able to be supported by P&R, subject to the appropriate location of species and further information as to how these are to be established, managed and maintained on an ongoing basis, in what is a very complex and challenging landscape, surrounded by invasive wilding conifers.
- 7.7. The proposal includes the creation of new mountain bike tracks, including a sanctuary perimeter track, the Bowen Peak downhill mountain bike track (descending from Bowen Peak to the One Mile Reserve) and upgrade of the existing One Mile Creek walkway (which is currently being repaired by QLDC contractors after recent storm damage) including installation of a new boardwalk and bridge. The extent of these works within the QLDC reserve land is not clear. These may improve recreation access through the QLDC and DoC reserves and could result in positive benefits to the community, although it is not clear how these new trails will integrate with the extensive existing trail network. The ongoing cost of the maintenance of the new trails is a potential issue for P&R. The application states that the Applicant is prepared to bear the responsibility and costs of maintaining the existing One Mile Creek walkway, leaving the rest of the trails within the reserve to be managed by QLDC. It is unclear how this would be appropriately managed and the ongoing cost implications for the QLDC.
- 7.8. The establishment of a predator-free sanctuary within the One Mile reserve as shown on the Reserve Sketches in Appendix 18 of the referral application is a component of the development that may be able to be supported by P&R, subject to further information in relation to how and when these areas are to be established, managed

and maintained. However, for the 290ha predator-free sanctuary proposed within QLDC, DoC and private land, it appears from some of the plans that it is to encompass some of the existing downhill mountain biking trails and will require bikers to disembark and proceed through double gates and then ride through the sanctuary to then leave through double gates. This will affect the use, enjoyment and safety of these trails for downhill mountain bike riding and possible adverse effects upon the wildlife that is intended to be protected within the sanctuary due to bikes travelling at high speed.

- 7.9. Overall, whilst there are possible benefits resulting from the proposal, insufficient information and detail is provided in the referral application to assess whether these benefits will be realised.

Concerns / Significant effects of the proposal

- 7.10. The referral application that has been received to comment on appears to be contradictory in a number of areas throughout the various documents. As a result, it is not possible to get a clear picture of what is being proposed particularly in relation to what the Applicant is proposing to develop, maintain, operate and manage, and what will fall upon the QLDC and others. For example, the ongoing costs associated with the maintenance and management of new trails or upgrades of existing trails, wilding species, new plantings and the predator-free sanctuary within the QLDC reserve land, as well as maintenance of any new trails and upgrades of existing trails within the DoC land. Further, the proposed location for the majority of the development on reserve and other publicly owned land appears to be opportunistic and no assessment of the alternative locations avoiding or minimising use of public land has been provided.

QLDC administered land

- 7.10.1. The predominant occupation of the reserve land for the proposal is of significant concern to P&R. The reserves are well-utilised by the public for a wide range of recreation activities and provide extremely accessible and valuable open space in close proximity to the residents of Fernhill and Queenstown. Furthermore, it appears that little regard has been given to the existing reserve values in the development of the proposal, and the Applicant has failed to assess the existing recreation use or reserve values that will be affected or displaced by the proposal.
- 7.10.2. The One Mile Reserve (as identified on Figure 5 below) is currently a tranquil area and its vegetated, incised gully formation creates a feeling of isolation and wilderness only a few minutes from the Queenstown town centre. The reserve is highly accessible to both locals and visitors given its proximity to both the Queenstown town centre and Fernhill and is a gateway to the wider reserve area. The existing uses of this area of the reserve includes the historic One Mile Powerhouse and walking track, Wynyard Bike Park and various mountain biking trails, and the Town Link Track (a pedestrian and cycle trail linking Fernhill to Thompson Street that is popular with commuters).



Figure 5: Concept Sketch of One Mile Reserve proposal (Source: Appendix 18 of referral application)

7.10.3. The commercialisation of the One Mile Reserve through the construction of several buildings, including the gondola building, a separate retail building and a large restaurant / café building all within the flat entrance area to the reserve will significantly change the intention of this area as a gateway to Ben Lomond. The relative solitude and tranquillity currently felt only a few metres into the reserve will be adversely impacted by the large-scale commercial buildings and the associated noise, movement and activity. The existing recreation values of the reserve as detailed in the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan will also be adversely affected, existing users will be displaced and it is unclear whether the existing carpark and vehicle access will be retained or replaced as part of the proposal, and whether it will continue to be available to the informal reserve users.

7.10.4. The potential adverse effects upon the heritage values of the One Mile Powerhouse, which is a Category 2 listed historic heritage feature, are also unknown with no assessment of this being provided within the referral application.

7.10.5. Whilst it could be argued that people visiting the reserve would want to be able to purchase a coffee, sandwich or something from a retail store when accessing the reserve, the reserve is located only 10 minutes' walk from the Queenstown town centre. Consequently, these activities are not a necessity in this location and are more appropriately located within the town centre than within a reserve valued for its natural and historic values.

7.10.6. One Mile Reserve contains one of the largest areas of well-established native vegetation in close proximity to Queenstown CBD. The removal of the wilding species and the construction activities are also likely to result in the removal of this native vegetation and no information relating to whether this would be protected is provided in the referral application.

Other open space land (not QLDC land)

7.10.7. The aerial transport system will improve access to the Ben Lomond Saddle for pedestrians and mountain bikers, noting that many users already access this area by foot or bike. Although this is stated in the referral application as a positive benefit

to the proposal, a number of associated potential adverse effects as a result of this have been identified by the P&R team.

7.10.8. The development of a large 2-3 storey commercial building and 86ha recreation park on Ben Lomond Saddle is at odds with the alpine / backcountry experience currently sought by people accessing this area, by introducing large-scale built form, infrastructure and thousands of additional visitors.

7.10.9. DoC maintain the Ben Lomond walking track above the treeline (location shown in Figure 3), with QLDC and the Queenstown Mountain Bike Club (QMTBC) maintaining the other walking and extensive mountain biking trails within the Ben Lomond reserve. The Ben Lomond Track is already extremely popular (number 2 in the list of things to do in Queenstown – Tripadvisor¹) given its accessibility from the Queenstown town centre and the outstanding views available from the Saddle and the summit. Over 20,000 people hike this track each year². The majority of the track is a pedestrian dirt track cut into the hillside, and this currently provides a suitable and often sought after level of service for the existing numbers of visitors, many whom will be seeking a backcountry wilderness experience. Being able to access the alpine environment directly from the CBD is an experience unique to Queenstown.

7.10.10. Some of the 720 Tripadvisor reviews are below:

- *We will definitely recommend this track! After a long hike, you're rewarded with one of the best views in Queenstown. I went there with my partner, and it's definitely one of our most memorable hikes together. The climb was challenging but so worth it—seeing that view at the top made every step count. An unforgettable experience we'll always look back on! (Rosie G Nov 2025)*
- *Despite the challenges and the difficulty of the trail, the outstanding views and the difficulty of the track is what makes the track itself and Queenstown special. The trail is totally worth it and rewarding, will definitely come back! (Freedom 22317... January 2025)*
- *I recommend taking time to go up the Ben Lomond Track. It was nice to be out and about in Pure nature. Didn't find the walk hard at all. The views are amazing and worth the hike. Suggest taking the gondola up to the luge and start from there to save the legs. (Chrissy 2021)*

7.10.11. The application however states that the Saddle Funifor transport system is anticipated to transport 1.1 million passengers per annum. This will clearly change the user experience and place additional and significant pressure upon the reserve and adjoining public land.

7.10.12. The existing mountain bike trail network that traverses the reserve area that may be impacted by the gondola construction works and ongoing operation, is already heavily used. QLDC has installed track counters on one of these trails (called Beeched As) recording over 20,000 trail users in one year. QLDC does not have the funds for wholesale upgrades of the mountain bike tracks to accommodate the Applicant's proposal to increase access and therefore patronage to the area.

¹ [Ben Lomond Track \(2026\) All You Should Know BEFORE You Go \(w/ Reviews & Photos\)](#)

² Stuff Article July 2018: <https://www.stuff.co.nz/environment/105268130/popular-queenstown-day-walk-on-ben-lomond-hosts-huge-number-of-search-and-rescue-missions>

- 7.10.13. The Ben Lomond Saddle and surrounds are a sensitive alpine environment and are described as such in the Applicant's Ecology Report. . Alpine environments are challenging environments within which to manage the effects of development and ongoing activities. Whilst increased access could be argued as a positive recreational benefit, it can also lead to significant adverse environmental outcomes and could displace existing users.
- 7.10.14. It is noted that the application does not specifically identify that the proposed Ben Lomond Saddle building will function as the base building for the proposed ski area, although all of the ski routes end at this location. This is likely to result in a significant activity footprint and associated curtilage area as there will likely be a spread of activities (eg outdoor eating areas, ski and snowboard storage, congregation areas for lessons, storage areas for skimobiles etc). Assuming a ski field at this location is feasible, this will result in a significant level of daily activity at the Saddle during the months of the ski season and the incorporation of the café/restaurant, retail and accommodation in this context on the Saddle will also increase this activity all year round. While the application states there will be no snow making activity or infrastructure, it is difficult to see how a ski field would be feasible without snow making given the reliance on snowmaking at the other ski fields in the district, most of which are at a higher elevation than Bowen Peak.
- 7.10.15. The application is also unclear about how the recreation park is intended to be managed and whether this is to be vested in QLDC, DoC or run by the Applicant or Ben Lomond Station. It is not clear from the application what the extent of the recreation park is, and there are QLDC, DoC and Ben Lomond Station parcels of land all within the vicinity of the Ben Lomond Saddle (refer Figure 2 above for QLDC reserve land).
- 7.10.16. If the Applicant intends to operate it, guarantees/bonds with regard to removal of infrastructure, buildings and the like would be required in case the development does not succeed, as remediating the land subject to development would be challenging and costly and should not be costs borne by ratepayers. This would apply to all parts of the development across all QLDC reserve land.
- 7.10.17. Although the application states that the change in aerial transport system will remove the need for a 4WD track, this is disputed. It is anticipated that such a track will still be required for construction and ongoing maintenance purposes as well as for emergency access such as it provided for Skyline on Bob's Peak and all the other ski fields in the District. There is currently no formed vehicle access to the Saddle area beyond Bob's Peak. This track will increase the potential visual and ecological effects of the proposal above those assessed in the referral application.
- 7.10.18. The potential ecological effects upon this alpine environment as a result of a significant increase in activity and development could lead to effects that are unable to be avoided, remedied, mitigated or offset. The high-level ecological assessment supplied with the application notes that habitats of high and significant ecological value are likely present within the project footprint and that some degree of impact to these habitats is likely to be unavoidable. Based on this high-level assessment and my knowledge of the area, I question whether the proposal could proceed without significant adverse effects that are unable to be equitably offset via the restoration and pest management programmes that are offered (but not guaranteed) as part of the proposal.

Staging

7.10.19. As noted above, the proposal may result in some benefits including the proposed wilding removal, upgrade of the One Mile walking track and the establishment of the predator free sanctuary. However, the indicative program of works supplied in the referral application has the realisation of these benefits at the end of the development. There is therefore no guarantee that these will ever be undertaken. These potential positive benefits of the proposal should be delivered early in the project.

Chalet development and connectivity

7.10.20. The proposed design of the Fernhill Heights residential development severely lacks connectivity both within the development and between the development and Fernhill. The meandering road design and lack of connections will create a car-centric development due to the distances required to travel.

7.10.21. Fernhill has the lowest provision of recreation reserve land in the District and the proposed Fernhill Heights development will not be within 5-10 minutes walking distance to a local park under the QLDC Future Parks Provision Plan. Consequently, it is recommended that the development incorporate a suitable local park that complies with the plan to be vested in QLDC to provide for the recreational needs of the development and nearby community.

Wildfire

7.10.22. Wildfire risk is another concern for P&R. This area of Queenstown has been designated a high fire risk zone (called the Queenstown 'red zone') by Fire and Emergency New Zealand (FENZ). The management of wildfire within this zone is precautionary and bans all outdoor fires to prevent the spread of wildfire through the dense vegetation on the slopes of Bowen Peak, Ben Lomond, Wedge Peak and Jessie Peak. QLDC have measures in place to monitor this risk, and reserve closures may be necessary during periods of elevated wildfire danger.

7.10.23. The Applicant proposes to establish extensive infrastructure which will exponentially increase the number of visitors to this area by approximately 1.1 million per year, putting significant pressure on this land and how it is managed. There are further concerns around the establishment of predator fencing and the accessibility issues of this in the event of a fire.

7.10.24. As noted in section 7.5 above, the Applicant proposes to remove approximately 400ha of exotic wilding species and revegetate with natives. This would be a considerable contribution in reducing the wildfire risk in this area of reserve, provided non-flammable species are established in replacement of invasive vegetation. Based on the concerns around additional infrastructure and accessibility, the removal of wildings would need to occur prior to the establishment of any infrastructure within the red zone.

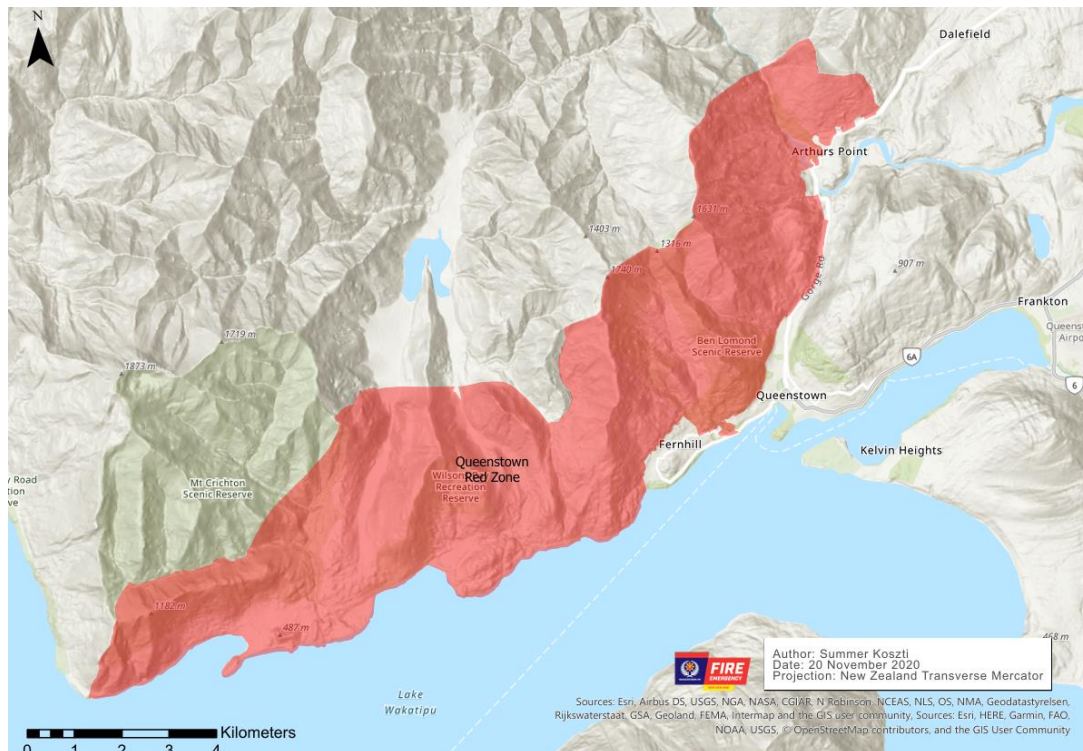


Figure 6: Aerial showing the 'red zone' (Source: Fire and Emergency NZ)

7.11. Landowner Approval Processes

7.11.1. The proposal includes development and use of a number of QLDC reserves and this will require additional written agreements or approvals from the QLDC prior to lodging any substantive application (if the referral is approved). There is no certainty that these agreements or approvals will be granted by the QLDC, and the FTAA referral process has not allowed sufficient time for discussion of these matters with the Councillors to ascertain their views on this matter.

7.11.2. A number of the properties to which the application relates are classified as reserves under the Reserves Act 1977. The FTAA addresses the grant of concessions (leases, licences, permits and easements) and the exchange of reserves. It does not address reclassification or revocation of reserve status. Furthermore, clause 3(1)(m) of Schedule 6 to the FTAA requires a substantive application for a concession on a reserve managed by a local authority to include confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve. I understand this means an application will not be accepted as complete, without confirmation of written agreement from the administering body, and/or that the FTAA requires the Panel to decline the approval of a concession in that situation. As the proposed commercial development (retail and restaurant / café) within the One Mile Reserve may be conflicting with the purpose of the reserve (recreation), these approvals from the QLDC are not guaranteed.

7.11.3. Whilst these written approvals are not a matter for the referral application and the QLDC cannot unreasonably withhold its agreement, the QLDC must take into account the relevant considerations under the Reserves Act 1977. The process for obtaining landowner approval would require significant consultation with Council (and possibly public consultation) to determine an appropriate alignment to facilitate obtaining Full Council approval.

7.11.4. When considering whether to provide written agreement for the use of reserve or recreation land, Council would consider the impacts on the reserve network including:

- Displacement of reserve users
- Fragmentation of reserve network
- Disrupted access and connection
- Mitigation/off-setting proposed
- Purpose of occupation (public transport vs. commercial)
- Future reserve potential and demands from increasing urbanisation and density
- Capacity of reserve to accommodate proposed infrastructure
- Classification and intended use of land
- Designations
- Reserve Management Plan

7.11.5. A number of the QLDC administered parcels are also designated under the Resource Management Act 1991 (RMA). Section 176(1)(b) of the RMA provides that no person may, without the prior written consent of QLDC, as Requiring Authority, do anything in relation to the land that is subject to the designation that would prevent or hinder a public work or project or work to which the designation relates. Whether the proposal meets this requirement has not yet been ascertained from the information included in the referral application. As designations are enduring, all potential public works/projects on the designated parcels are not fully realised at this stage and future projects must also be considered. Notwithstanding this, there are outstanding concerns with regard to adverse impacts upon the continuity of the existing mountain bike trails and the commercial operations proposed for the One Mile Reserve. Whilst I understand this is also not a matter for the referral application, the Applicant is to be mindful that a reasonable timeframe will be required for discussion and negotiation with the QLDC in this regard and approval is not guaranteed.

7.12. **Alignment with QLDC strategies and plans**

7.12.1. The strategies and plans of most relevance to the assessment of the proposal by P&R are the Queenstown Lakes Proposed District Plan (PDP) and the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (RMP) 2025.

7.12.2. The most relevant PDP objectives and policies are listed in **Appendix 2** below. While I understand a full assessment of the proposal against relevant PDP objectives and policies is not a mandatory requirement for a referral application, I note that at a high level, there are concerns with regard to the protection of the natural environment and ecosystems, the nature and scale of the activity being incompatible with the amenity values of the land. In addition, the functional need for the activity to be located within the Open Space zoned land which is the direction of Objective 38.2.3 and Policies 38.2.1.5, 38.2.2.2 and 38.2.3.1 of the PDP, has not been sufficiently established by the Applicant.

7.12.3. The recently adopted Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (RMP) 2025 is of relevance to the area shaded in green in Figure 2 above. This RMP was adopted by the QLDC on 31 July 2025 following public consultation in accordance with the Reserves Act 1977 and the Applicant was a submitter in the process. There was a high level of

engagement in the RMP process which highlighted the value of the reserve to the local community.

7.12.4. The RMP is a relevant document for the assessment of the substantive application (Schedule 6, Section 3(1)(e) of the FTAA) and its provisions will also be considered when assessing the suitability of providing any written agreement.

7.12.5. The vision statement for the RMP is:

“Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves will be iconic alpine landscapes, where the removal of invasive wilding conifers is prioritised to support native biodiversity, honouring cultural identity and where the community experiences world-class, sustainable recreation within a resilient natural environment.”

7.12.6. The most relevant RMP objectives and policies are listed in Appendix 3 below, with the following policy being key to the consideration of the scale of the proposal.

Policy 14.3.10. New commercial activities within the reserves will generally be limited in scale and location to protect the natural character and recreational values of the reserves. However, proposals that can demonstrate a significant wider public benefit such as improvements to sustainable transport, accessibility, or community connectivity may be considered, subject to robust assessment under the Reserves Act 1977 and appropriate statutory and community consultation.

7.12.7. The RMP therefore anticipates development within the Ben Lomond reserve which is compatible with the wider values of the reserve land and will not detract from the character and amenity of the reserve. Whilst the proposal contains components which are consistent with the RMP objectives and policies, particularly with regard to wilding removal and enhanced public access to the reserve land, the scale and nature of the proposed commercial buildings within the One Mile Reserve and on the Ben Lomond Saddle are not considered to be necessary to support the activities within the reserve, and insufficient information has been provided with regard to the wider benefits of the proposal in aligning with the vision and values of the reserve.

8. SUMMARY AND RECOMMENDATIONS

8.1. Parks and Reserves cannot support the Powerhouse Fast Track Application at this stage.

8.2. The QLDC and DoC reserve network is heavily relied upon by the Applicant to deliver and complete this project. The reliance of the proposal on the reserve network places a burden on public land set aside for recreation, nature and conservation purposes, which the Applicant has not sufficiently addressed in the referral application.

8.3. Further investigation needs to be undertaken by the applicant to refine the proposal and consider alternative locations that utilise private land for building and pylon locations rather than utilising public reserves and reducing the quality and quantity of the open space network. The Applicant needs to provide a detailed assessment of public vs private land alternatives. Where public land is the only option, the Applicant must provide details of how the existing reserve values will be maintained or enhanced.

8.4. The use of recreation reserves for a commercial project would be contrary to the intended use and purpose of a recreation reserve to provide public access and enjoyment for recreation activities and the protection of the natural environment and

retention of open space (as defined in s17 of the Reserves Act 1977). Whilst there are some components of the proposal that could provide public and environmental benefit, insufficient details have been provided.

- 8.5. The proposal as submitted will result in an increased burden upon the reserve land, reduce the reserve land available for the benefit of the public, and result in undue commercialisation of reserve land. Furthermore, significant work needs to be undertaken by the Applicant with regard to the potential adverse effects the proposal may have upon the sensitive alpine environments on Ben Lomond and Bowen Peak.
- 8.6. There are also potential cumulative effects with regard to the QLDC reserve network should both this referral application and the Queenstown Cable Car application receive approval. Both are currently before the Minister for a decision and very similar concerns have been raised by the QLDC in both with regard to the reliance upon Council owned and administered reserve land.

Appendix 1: Email Correspondence from QLDC to Applicant re Licence to Occupy

Jeannie Galavazi

From: Jeannie Galavazi
Sent: Thursday, 18 December 2025 4:10 PM
To: Bowen Peak
Cc: Parks Planning; Neil Harkin
Subject: Ben Lomond Reserve proposed tree removal works

Kia ora Guy

I'm responding to your request for QLDC to sign a licence to occupy, drafted by RVG Law, for works within the Ben Lomond Reserve at One Mile, for the purposes for removing trees.

The works are proposed over a large parcel of public recreation reserve with steep topography and a sensitive receiving environment. A licence is not the correct mechanism for approval as this type of work would be a contractual arrangement. As Council and landowner of public land, we are a PCBU and, as such, cannot simply licence this type of complex operation to a third party.

Council would be required to be actively involved in both the planning and implementation of the works.

To enable an assessment, specialist reports must be completed and reviewed to ensure all environmental, operational, and hazard-related risks are fully understood and appropriately managed. This includes clear consideration of health and safety obligations, risk controls, and compliance with relevant legislation to ensure the safety of workers, contractors, and the public. These reports include (but are not limited to):

- An Operational and Harvest Forestry Plan;
- A stormwater assessment to quantify changes in runoff following tree removal and as new vegetation reaches maturity;
- A comprehensive revegetation plan that addresses wildfire risk, ongoing maintenance requirements (including weed, and pest control), and the influence of surrounding Douglas fir seed sources;
- A detailed geotechnical and rockfall assessment to determine any stability risks, required works, and associated mitigation costs;
- A detailed ecological assessment of existing native vegetation;
- An Environmental Management Plan;
- A Landscape Assessment.

Completion and review of these documents would be required before any operation could be considered for approval or implementation.

I see that you've requested a pre application with planning which Parks will attend. This meeting would be the appropriate forum to discuss this proposal and information requirements.

Ngā mihi,

Jeannie Galavazi
Principal Parks and Reserves Planner
Community Services
Queenstown Lakes District Council



Appendix 2 – Proposed District Plan objectives and policies

Chapter 3 – Strategic Direction

Objective 3.2.4 – The distinctive natural environments and ecosystems of the District are protected.

Policy 3.2.4.3 – The natural character of the beds and margins of the District's lakes, rivers and wetlands is preserved, or enhanced where possible, and protected from inappropriate subdivision, use and development.

Policy 3.2.4.5 – Public access to the natural environment is maintained or enhanced.

Policy 3.2.4.6 – The values of significant indigenous vegetation and significant habitats or indigenous fauna are protected.

Objective 3.2.6 – The District's residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.

Policy 3.2.6.1 – The accessibility needs of the District's residents and communities to places, services and facilities are met.

Policy 3.2.6.2 – A diverse, resilient and well-functioning community where opportunities for arts, culture, recreation and events are integrated into the built and natural environment.

Strategic Policy 3.3.2 – In rural areas, provide for commercial recreation and tourism related activities that enable people to access and appreciate the District's landscapes provided that those activities are located and designed and are of a nature that:

- a. Protects the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; and*
- b. Maintains the landscape character and maintains or enhances the visual amenity values of Rural Character Landscapes*

Strategic Policy 3.3.20 – Manage subdivision and / or development that may have adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins so that their life-supporting capacity is safeguarded; and natural character is maintained or enhanced as far as practicable.

Chapter 38 – Open Space and Recreation Zones

Objective 38.2.1 – The open space land and facilities administered by the Council make a major contribution towards meeting the needs of the District's residents and visitors for passive and active recreation.

Policy 38.2.1.4 – Protect open space, recreation and amenity values by managing the adverse effects of, and conflicts between, different types of recreation activities.

Policy 38.2.1.5 – Avoid activities that do not have a practical or functional need to be located within Open Space and Recreation Zones, unless a particular activity:

- a. Is compatible with and does not affect the continued operation of established activities;*
- b. Is of a location, nature and scale that does not preclude development of new open space and recreation activities; and*
- c. Maintains or enhances recreation, amenity and heritage values.*

Objective 38.2.2 – Recreation activities are undertaken and facilities constructed in a way that maintains or enhances the values of open space areas and the recreation opportunities available within the District.

Policy 38.2.2.1 – Ensure activities are undertaken in a manner that maintains or enhances the recreation and amenity values of the relevant reserve and surrounding environment, including natural, scenic and heritage values.

Policy 38.2.2.2 – Limit activities, buildings and structures to those compatible with the rule and function of the zone, and the sensitivity of the surrounding environment, and which maintain or enhance the anticipated use or values of the zone.

Objective 38.2.3 – Commercial activities are limited to those that have a functional requirement to locate within Open Space and Recreation Zones and maintain or enhance open space and recreation values.

Policy 38.2.3.1 – Ensure that commercial activities have a genuine link with the open space and recreation resource.

Policy 38.2.3.2 – Ensure that commercial activities maintain the quality, amenity values and landscape values of open spaces.

Policy 38.2.3.3 – Provide for commercial recreation activities that maintain the quality of the experience of people partaking in other commercial recreation activities and other passive and active informal recreation activities, having particular regard to the scale, intensity and cumulative effects of commercial recreation activities.

Objective 38.3.1 – Use and development complements and protects the nature conservation values and natural qualities of the Nature Conservation Zone.

Policy 38.3.1.1 – Provide for appropriate use and development by:

- a. Limiting activities, buildings and structures to those necessary to maintain the use or values of the zone and only allowing these where they cannot be located on other adjoining or nearby land for the same purpose;*
- b. Locating and designing new buildings, structures, additions and parking areas to protect and maintain the character and values of the zone;*
- c. Mitigating the visual impacts of buildings, structures and parking areas through appropriate landscaping and design responses; and*
- d. Identifying opportunities to enhance biodiversity and providing for these opportunities to be realised as part of the mitigation of the adverse effects of subdivision of adjoining land and use and development within the zone.*

Objective 38.4.1 – Use and development for informal recreation maintains and enhances the environment

Policy 38.4.1.1 – Enable a variety of informal recreation³ activities, including small scale community uses and accessory activities.

Policy 38.4.1.2 – Encourage commercial recreation activities and related commercial activities to complement and enhance other uses and experiences in the Informal Recreation Zone while at the same time maintaining or enhancing the landscape and amenity values of the zone.

Policy 38.4.1.3 – Provide for multiple recreation activities while managing conflicts between multiple uses, and ensuring public safety and public access to informal recreational opportunities are maintained and enhanced.

Policy 38.4.1.4 – Ensure that buildings and activities that exclude or restrict public access are limited so as to encourage public use and maintain open space for informal recreation, recognising that the existing facilities that have been established within this zone, in some instances, may be extended or redeveloped.

³ Means a pastime, leisure sport or exercise activity that occurs on an ad hoc basis or are regularly and contributes to a person's enjoyment and/or relaxation. Excludes Organised sport and recreation.

Policy 38.4.1.6 - Opportunities are taken to enhance recreational trail networks, cycling and walking linkages within the zone, and to other zones, to create a contiguous network to assist residents and visitors to move through and around neighbourhoods, and to other destinations, thereby providing an alternative and sustainable mode of transport.

Appendix 3 – Reserve Management Plan objectives and policies

RMP General Objectives

- 12.4 *To acknowledge the presence of the monoculture of wilding conifers in both reserves and the need for removal.*
- 12.5 *To protect, restore and enhance existing biodiversity values by eliminating invasive species, prioritising wilding conifer removal.*
- 12.7 *To enable new recreation opportunities that are sustainable and low impact on the environment.*
- 12.8 *To enhance low impact recreation access to backcountry alpine terrain.*
- 12.13 *To provide for people of all abilities opportunities to be active, recreate, come together, connect with nature and find respite.*
- 12.14 *To provide for a variety of appropriate commercial recreation and informal recreation opportunities that support Queenstown’s tourism industry as well as the local community’s enjoyment of the reserves.*
- 12.15 *To provide for accessible connections into the reserves.*
- 12.16 *To promote built structures that support the recreation uses of the reserves and that positively contribute to the reserve amenity and provide public benefit.*
- 12.17 *To formalise a sustainable and well managed trail network within the reserves that meets the needs of a range of trail users, provides a cohesive track network, and considers ongoing safety requirements including maintenance and adapts with progressive wilding conifer control.*
- 12.18 *Enable recreational use and enjoyment of the reserves by responding to shifts and changes in demand for recreational activities.*

Ben Lomond Entrance

Objective - To ensure the One Mile is recognised as a formal arrival area into Te-Taumata-o-Hakitekura Ben Lomond Reserve.

- Policy 13.1.7.2 *Protect One Mile Pump Station heritage values.*
- Policy 13.1.7.3 *Consider installing public toilets at the One Mile reserve entrance.*
- Policy 13.1.7.4 *Consider upgrading the entrance road and carpark to cater for more vehicles.*
- Policy 13.1.7.5 *Support the development of a new multi-use uphill-trail near One Mile to connect to the existing network.*

Commercial Use

- Policy 14.3.7 *Consider additional commercial recreation activities on Te-Taumata-o-Hakitekura Ben Lomond only where they are compatible with the reserves wider values and in accordance with policy 14.3.9 below.*
- Policy 14.3.9 *Consider the granting of new commercial lease or licence agreements, or the renewal of existing lease and licence agreements, that:*
 - a. *Are consistent with the reserve’s classification and any reserve specific policies set out in the special management zones in section 6.*
 - b. *Do not adversely detract from the general character and amenity of the reserve and other reserve users.*
 - c. *Allows recreation activity that uses the unique topography of the reserve to improve the public use and enjoyment.*
 - d. *Ensure commercial operators contribute to improved environmental outcomes.*

- e. Consider new, or expansion of existing, commercial lease areas immediately to the west of the existing (at the date of this plan) Bobs Peak commercial lease area, to encourage consolidation of buildings and commercial activity.
- f. Require any new commercial agreements at the top of Bob's Peak to enhance integration with the Tiki Trail and the Ben Lomond Trails to improve user experience.

Policy 14.3.10. New commercial activities within the reserves will generally be limited in scale and location to protect the natural character and recreational values of the reserves. However, proposals that can demonstrate a significant wider public benefit such as improvements to sustainable transport, accessibility, or community connectivity may be considered, subject to robust assessment under the Reserves Act 1977 and appropriate statutory and community consultation.

Reserve Development

Policy 14.6.1 Consider the development of built structures, as necessary, to provide for the function and support of formal and informal recreation activities on the reserves.

Policy 14.6.2 Consider permitting new commercial activity that delivers substantial community and reserve wide benefits where these align with the reserves vision and values.

Technical Memo

To:	QLDC Resource Consent Team
From:	Katie Russell, Intermediate Policy Planner
Date:	Thursday, 26 February 2026
Subject:	Fast-Track Approvals Act 2024 Powerhouse Project: Referral Application (FTRA2601) Policy Planning technical comment

1. Executive Summary

- 1.1. This memorandum provides Policy Planning input to inform the Queenstown Lakes District Council (QLDC or Council) response to the Minister under s17 of the Fast Track Approvals Act (FTAA) for the Powerhouse Project referral application by Bowen Peak Limited.
- 1.2. The referral application is for a development on Bowen Peak, Queenstown and includes an aerial transport system, the construction of a series of chalets over 52ha with an approximate yield of 1,333 residential units, and the development of a tourism recreation facilities including both ski and mountain bike facilities, as well as wilding pine clearance and ecological restoration and enhancement.
- 1.3. A policy planning memo (Appendix 8) has been provided in the Powerhouse (2026) referral application to QLDC. The proposal contains some positive elements in relation to housing supply, biodiversity enhancement, and the ambition to integrate a gondola-based multimodal transport system. However, there are also significant areas where the proposal does not adequately address key matters - particularly accessibility, urban form, infrastructure planning and funding, and, most notably, the objectives and policies of the District Plan and established growth strategies.
- 1.4. Under the National Policy Statement on Urban Development (NPSUD), the proposal partially meets the criteria for a well functioning urban environment once completed. The proposal contributes additional housing, and provides for tourism and small scale commercial activity, albeit these activities are all located beyond the current urban growth boundaries. Under the NPSUD, the proposal may partially meet some of the criteria for a well functioning urban environment, once completed (noting the 20+ year implementation period). However, alignment with accessibility, emissions reduction and resilience policies depends heavily on the gondola functioning as a

reliable, integrated public transport mode.

- 1.5. At a strategic level, the proposal is not aligned with the Grow Well Whaiora Spatial Plan, particularly the Priority Development Areas (PDAs). PDAs are the primary tool identifying and setting the locations for future urban growth in the district. The Spatial Plan is prepared through a public process and gives a collective view of whether future growth will be focused. The proposal is not in a PDA, and this is a critical lack of alignment with district planning documents, the effect of which cascades across into the QLDC Infrastructure Strategy and the Long Term Plan. Together with the strategic directions of the District Plan, these three documents anticipate consolidated growth within identified urban areas rather than expansion into rural landscapes. Planned QLDC investment in Fernhill in terms of transport and 3 waters infrastructure is described in the P&I technical memo that is also attached to the QLDC comments. That investment does not consider large-scale urban expansion in the location of this development; nor does the QLDC Spatial Plan.
- 1.6. While the project supports some goals within the QLDC's Housing and Business Capacity Assessment and Homes Strategy—including diverse typologies and affordable housing in partnership with the Queenstown Lakes Community Housing Trust—key details such as tenure structure and price points are missing, limiting the ability to assess its contribution to identified market gaps. The provision of accommodation for workers aligns with demonstrated housing need for this sector of the housing market, but lacks clarity on how residential housing will be retained for worker housing over time in this district where housing is regularly converted to tourist accommodation.
- 1.7. Assessment against District Plan Chapters 3 (Strategic Direction), 4 (Urban Development) and 6 (Rural Landscapes) indicates partial alignment with strategic growth objectives but notable conflicts regarding outstanding natural landscapes, avoidance of sprawl, and the role of the Urban Growth Boundary. Additional policy misalignment relates to hazard considerations, and potential effects on waterbodies and this misalignment will flow through to zone and district wide parts of the district plan across a number of chapters.
- 1.8. Overall, the proposal demonstrates ambition but lacks detail to confidently confirm alignment with strategic planning priorities and guidance from national direction downwards.

2. Introduction

- 2.1. QLDC has been asked to provide comment on a referral application for a proposed development located between One Mile Reserve and Bowen Peak, Queenstown comprising an aerial transport system, construction of up to 1,333 residential units, creation of a recreation park, wilding pine clearance, ecological restoration and establishment of predator free sanctuaries.
- 2.2. The purpose of this memo is to provide policy planning comment on the proposal and specifically appendix 8 of the application which addresses the strategic planning

and policy context of the proposal.

3. Qualifications and experience

- 3.1. This report was prepared by Katie Russell, intermediate policy planner at QLDC.
- 3.2. I hold a dual major Bachelor in Environmental Studies and Modern Literature from the University of California at Santa Cruz. I also hold a Masters in Resource and Environmental Planning from Massey University, and have been a planner at QLDC for the last eight years where my responsibilities have including policy planning research, writing and presenting evidence at Council hearings.
- 3.3. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical report has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.
- 3.4. In this memo, I have reviewed the evaluation provided in the proposal and identified several areas where the assessment could be strengthened in relation to the policy planning framework. I have followed the sequence of documentation set out in Appendix 8 of the proposal provided in the Powerhouse (2026) application. Within the suite of documents, I have not evaluated those related to the Regional Council or iwi, instead I have focused on national instruments, and those prepared at district level.

4. National Policy Statement Urban Development

- 4.1. Policy 1 – “well functioning urban environments” requires planning decisions to, at a minimum:
 - i. Enable a variety of homes that meet needs by type, price and location,
 - ii. and enable Māori to express cultural traditions and norms;
 - iii. Enable a variety of sites for business;
 - iv. Provide good accessibility between housing, jobs, community services, and open spaces, including by public or active transport;
 - v. Support competitive land and development markets;
 - vi. Support reductions in greenhouse gas emissions; and
 - vii. Ensure resilience to current and future climate change effects.
- 4.2. As a complete package, the proposal meets aspects of (i), the Fernhill Heights development is expected to be rolled out in stages over roughly a decade, however

most of the new dwellings would come onto the market in the medium to long term— at a time when the district is already forecast to have adequate or surplus overall capacity.

- 4.3. The proposal incorporates a 5% contribution to the Queenstown Lakes Community Housing Trust, and also sets out provision for worker accommodation. The commercial aspect of the proposal is also met in part through the provision of tourism businesses and the potential for future home occupations in the residential areas as well as spaces for small local shops for daily needs.
- 4.4. In my view the adequacy of the proposal relative to accessibility is less clear. A key part of the proposal under Policy 1 of the NPS-UD relies on the delivery of the proposed multi-modal transport system within the ONL, above the existing developments of Fernhill, and down to the Powerhouse Station, approximately 2.2 kms outside of central Queenstown (Figure 1). The Fernhill Heights Station is located high up the hill, and the likelihood of it being a viable commuter or public transport option for the existing Fernhill suburb is unclear.
- 4.5. Alignment with the NPS-UD is contingent on the gondola operating as reliable, regular transport, integrated with bus services, fares, ticketing, and first/last-mile solutions. The indicative program of works supplied in the referral application has the realisation of many of the benefits at the end of the development (e.g. in approximately 28 years). There is therefore no guarantee that these will ever be undertaken. The extent to which the proposed gondola can function as a regular and reliable transport mode (public or private) capable of delivering an accessible urban environment in accordance with the NPS-UD remains uncertain. This comment is supported by the expert transport comment made in the QLDC P&I technical memorandum.

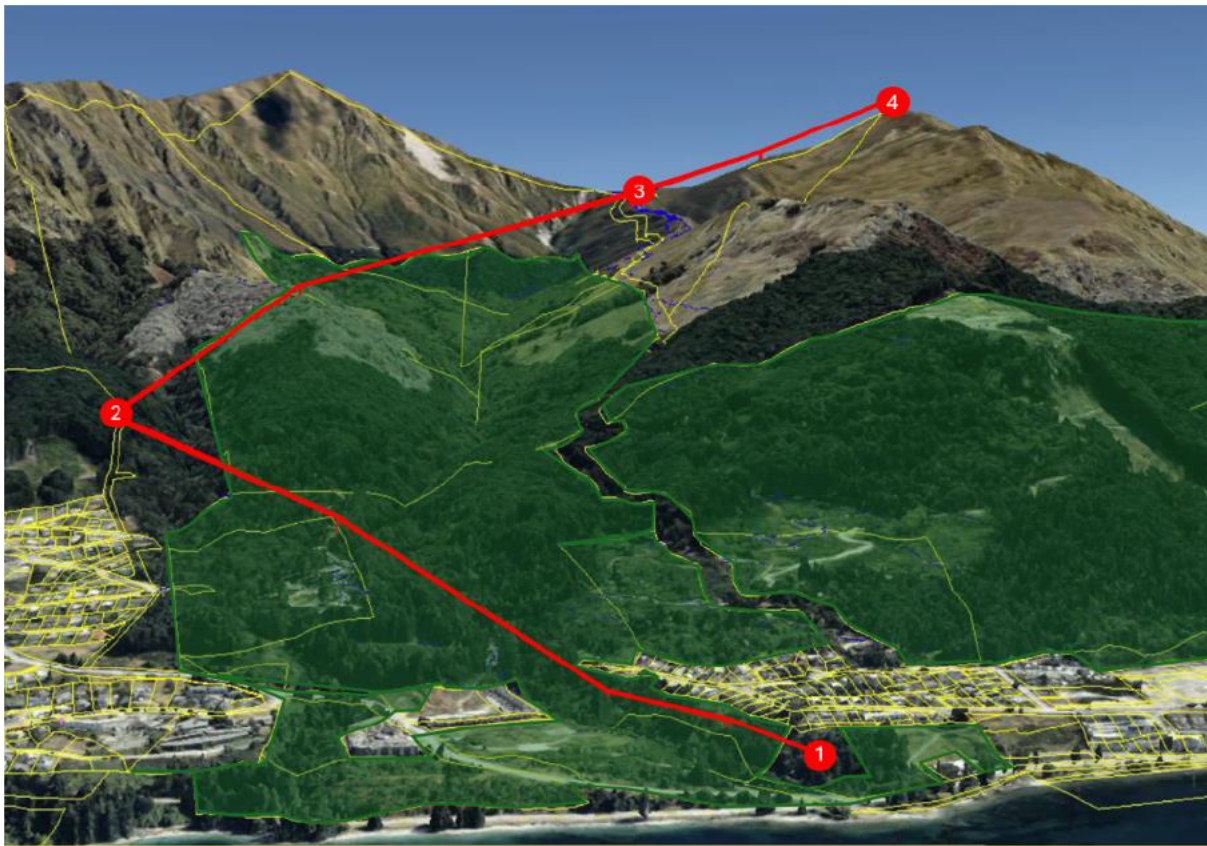


Figure 1: Approximate location of aerial transport system (red), QLDC reserve land (green shading) and gondola stations (#1 Powerhouse station, #2 Fernhill Heights station, #3 Saddle station and #4 Bowen Peak station).

4.6. Other aspects related to accessibility which are unclear include:

- Elaboration of the social and community facilities to be “extended” as noted in the proposal currently (and what consents that may require).
- Consideration of the pace/timing of the various aspects of the development that would contribute to a ‘well-functioning urban environment’ over the short/medium/long term.

4.7. The proposal asserts “strong consistency” with the NPS-UD and relies on the proposal being a “logical extension” notwithstanding its location outside the Urban Growth Boundary and within an Outstanding Natural Landscape (ONL). That conclusion is not agreed with. In my view, weight is limited by: (i) unresolved accessibility and integration dependencies on the gondola; (ii) absence of a demonstrated public transport network role beyond a private ropeway concept; and (iii) the strategic misalignment with the District Plan’s consolidation framework. The QLDC P&I Technical memorandum (also attached to the QLDC comments), which covers transport and 3 waters also comments that this development is outside of any scheme boundary and in an area not anticipated for future development. Accordingly, any claimed “strong consistency” should be framed as conditional at best, noting significant policy tension with compact growth tools and development timing.

5. National Policy Statement for Indigenous Biodiversity

- 5.1. The proposal extends across multiple watersheds and further into high-country tussock land. An ecological report is provided as part of the referral application (Appendix 9) which indicates that the final location and construction methodology will require detailed consideration.
- 5.2. In my view this subsequent work will be critical in determining the extent of environmental benefit in NPS-IB terms, particularly regarding the long-term management and support required for the proposed large-scale ecological enhancements. The biodiversity programme is said to deliver “strong alignment”. However, the ecological reporting notes that significant ecological values are likely present within the footprint and that avoidance may not be practicable in places. The nature and magnitude of ecological effects have not been assessed against the effects-management hierarchy in the NPS-IB, and the current proposal appears to rely on the assumption that the proposal will sufficiently offset or compensate any loss. It is expected that further assessment, should the project be referred, will be necessary, and without this further assessment in my view the proposal’s adherence to the NPS-IB is unclear.

6. Other national policy not addressed in the referral application

- 6.1. Schedule 5, clause 2 of the FTAA requires that there be an assessment of the project against any relevant national policy statement and any relevant National Environment Standard. For this proposal, NPSs which have not been considered include the NPS Natural Hazards (**NPS NH**) and the NPS Freshwater Management (**NPS FM**), both of which in my view are of relevance.
- 6.2. The NPS NH was gazetted on 15 December 2025 and came into force on 15 January 2026. The purpose of the NPS NH is to ensure consistent national management of natural hazard risk, addressing gaps in how local authorities identify, assess, and respond to natural hazards in land use planning. It responds to the problem that development in hazard prone areas has historically continued without sufficient risk assessment, exposing communities and infrastructure to increasing losses, exacerbated by climate change. In my view, the NPS NH is highly relevant to the assessment of this proposal; the sites are located on steep alpine landforms with identified exposure to landslide, erosion, and stormwater hazards. These are traversed in geotechnical reporting to support the proposal which has been peer reviewed for QLDC by WSP (attached as Appendix D to the QLDC comments).
- 6.3. The WSP peer review undertaken for QLDC concludes the level of hazard risk assessment completed is insufficient, stating that it presently does not meet the minimum requirements of the district plan (Chapter 28), the regional policy statement or accepted industry standards for the scale of works envisioned. Given that a referral application must provide an assessment against any relevant NPS, this appears to be a gap in the application. With the information in the referral application it is not possible to comment on whether there is alignment with the NPS

NH or not. The NPS NH says 'very high' risk must be avoided and 'high and medium risk' must be avoided but can be mitigated if the mitigation is proportionate to the risk.

6.4. The application is also missing an assessment against the NPS FM. The NPS FM requires that all planning and consenting decisions “give effect to Te Mana o te Wai,” which prioritises the health and well-being of water bodies and freshwater ecosystems ahead of human uses. In the context of this proposal, there are potential effects in NPS FM in terms on One Mile Creek, Two Mile Creek and any tributaries and consideration of the effects of the project including earthworks, slope modification, stormwater discharges, and changes to hydrological pathways may alter water quality, flows, natural character, and ecological function. The proposal has not considered the NPS FM, and therefore given these unknowns, comment on alignment is difficult.

7. Grow Well Whaiora Spatial Plan

7.1. The 2021 Spatial Plan sets a long-term vision to guide growth across the district to 2050. Developed under the Whaiora Grow Well partnership (QLDC, Kai Tahu, central government and ORC) the Spatial Plan responds to the identified challenges of housing affordability, infrastructure pressure, climate change and tourism impacts. Promulgated in response to the NPS UD, and subject to special consultative procedure under the Local Government Act, the Spatial Plan sets a consolidated growth model with five outcomes:

- (1) Consolidated growth and more housing choice
- (2) Public transport, walking and cycling as the preferred daily travel
- (3) A sustainable tourism system
- (4) Well designed neighbourhoods that provide for everyday needs
- (5) A diverse and thriving economy where everyone can prosper.

7.2. The Spatial Plan aims to deliver well designed, resilient communities with diverse housing, sustainable transport and a thriving economy. Central to the Spatial Plan are six priority development areas (PDA), identified as key locations for enabling medium and high density well-functioning neighbourhoods across Queenstown and the Upper Clutha. Each PDA is intended to unlock growth potential while ensuring infrastructure, transport and the environment are addressed to provide for sustainable and resilient development, they are the framework for future growth and development in the district.

7.3. It is significant that the proposal is not within a PDA. This fundamental lack of alignment is borne throughout all the strategic and planning documents for the district and in particular is reflected in the lack of alignment of the proposal with the QLDC Infrastructure Strategy, the Long Term and Annual Plans, and the Strategic Directions section of the District Plan.

7.4. In my view the current evaluation is limited, and a more fulsome evaluation against each of the five outcomes and respective strategies would have been useful to

demonstrate the strengths and weaknesses of the proposal in strategic planning terms. While the proposal does discuss parts of the Spatial Plan where it aligns well, it could have been expanded to include contemplation of aspects which do not align to better demonstrate the “holistic” balance being sought by the proposal. That would be a fulsome evaluation from an expert planning perspective.

8. QLDC Infrastructure Strategy

9. QLDC Long Term Plan

9.1. The LTP sets out the projects, activities and services that Council will invest in over a minimum ten-year period. The Council’s financial strategy, embedded in the LTP, highlights the Council’s investment in core infrastructure as a key focus, and acknowledges enabling growth infrastructure is a constraint which will need to be met as development occurs by development contributions or other similar methods.

9.2. Planned QLDC investment in Fernhill is limited to corridor based transport upgrades within the urban boundary and outside the ONL and therefore does not currently consider largescale urban expansion in this location. Implementation of large sale development outside of anticipated PDAs has the potential to impart an opportunity cost in operational delivery, potentially at the expense of growth in other, strategically planned areas instead. This is also reflected in the P&I Technical memorandum attached to the QLDC comments.

10. The Provision of Housing - Housing and Business Capacity Assessment and the QLDC Homes Strategy

10.1. The proposal includes 1,333 units with 5% Queenstown Lakes Community Housing Trust allocation and 50% “key worker” allocation. The commitment to retained affordable housing through the Queenstown Lakes Community Housing Trust is acknowledged. In my view the delivery of affordable units should occur at least in parallel with other residential development. The inclusion of sustainable design and development principles is also supported.

10.2. A key issue highlighted in both the HBA and the Homes Strategy is the use of residential housing stock for visitor accommodation, and clarity in the proposal on the tenure splits, and residential and commercial (visitor accommodation) uses across the development is lacking. The inclusion of 50% worker accommodation is a positive aspect of the proposal. However, the mechanism to ensure its ongoing provision remains unclear. Reliance solely on resource consent conditions does not guarantee that residential worker housing will continue to be delivered over time. Future applicants could seek to vary consent conditions, enabling a shift from residential worker housing to commercial visitor accommodation, thereby undermining long term worker housing outcomes.

10.3. The 2025 HBA identifies that the median house sale price in QLD is 11.3 times the median household income. As a benchmark, housing is generally considered affordable when it costs no more than five times the median income,

indicating a significant affordability challenge within the district. The HBA also notes within market offerings, there are significant pressures within the lower end of QLD's housing market, with a limited supply of lower value dwellings.

10.4. The Homes Strategy defines affordable housing as up to 35% of the median income, in present terms this is \$849 per week for housing and related costs for a household earning \$125,600 per annum. The proposal does not provide sufficient detail on the tenure models or pricing structures anticipated for the development. Further information is needed to understand how these offerings will respond to the documented gaps in entry level to midmarket housing identified in both the Homes Strategy and the 2025 HBA.

10.5. In my view while aspects of the proposal seek to meet housing need through targeting worker and affordable housing, the majority of the project is more likely to be provided for visitor accommodation and therefore is only in partial alignment with the Homes Strategy and district housing needs demonstrated by the HBA.

11. **Parks and Open Spaces Strategy 2021, Reserve Management Plan** : The technical memo prepared by QLDC Parks and Reserves Planning team, assesses the Reserve Management Plan. See in particular section 7.12 Alignment with QLDC strategies and plans.

QLDC District Plan

12. Chapter 3 – Strategic Direction

12.1. Chapter 3 of the district plan sets out the over-arching strategic direction for the management of growth, land use and development in a manner that ensures sustainable management of the Queenstown Lakes District's special qualities. The evaluation in the application takes a broad view of alignment without direct engagement in policies with specific relevance. The management of sprawl into rural areas and the protection of landscapes is not aligned, and this is noted throughout the proposal. The application acknowledges the misalignment with the Urban Growth Boundary as a matter to work through, however this is not a matter easily 'worked through' – it is not a matter that can be mitigated through conditions of consent, for example. The district plan is very specific on what is appropriate development outside the UGB (and that urban development is to be avoided), which is not addressed in the assessment. Key strategic policies were set out below.

12.2. A key strategic objective is *Urban growth is managed in a strategic and integrated manner* and the associated limbs below:

- a. *promote a compact, well designed and integrated urban form;*
- b. *build on historical urban settlement patterns;*
- c. *achieve a built environment that provides desirable, healthy and safe places to live, work and play;*
- d. *minimise the natural hazard risk, taking into account the predicted effects of climate change;*

- e. *protect the District's rural landscapes from sporadic and sprawling urban development;*
- f. *ensure a mix of housing opportunities including access to housing that is more affordable for residents to live in;*
- g. *contain a high quality network of open spaces and community facilities; and*
- h. *be integrated with existing, and proposed infrastructure and appropriately manage effects on that infrastructure.*

12.3. While the proposal has some alignment some limbs of this objective, specific analysis against each limb is lacking, without which the full balance of the assessment is rendered a challenge. Other strategic policies where assessment is lacking include those which relate to the visitor industry in suitable locations relative to landscape values:

Strategic Policy 3.3.2 In rural areas, provide for commercial recreation and tourism related activities that enable people to access and appreciate the District's landscapes provided that those activities are located and designed and are of a nature that:

- a. *protects the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; and*
- b. *maintains the landscape character and maintains or enhances the visual amenity values of Rural Character Landscapes.*

12.4. The proposal does not align with other key aspects of Chapter 3, including:

- A strategic policy related to economic diversification (SP 3.2.1.6);
- The protection of ONLS within diversification of land uses (SP 3.2.1.8), and the retention of landscapes (SO 3.2.5) and associated strategic policies.
- Strategic Policies related to the National Environment (3.3.19).

13. QLDC District Plan – Chapter 4 – Urban Development

13.1. Chapter 4 of the Proposed District Plan establishes the objectives and policies that guide the spatial location, form, and sequencing of urban development across the District. It provides a clear strategic framework to ensure that growth occurs in a logical, coordinated manner and within areas identified as suitable for urbanisation. The proposal as a package, however, does not align with this strategic direction. It is located outside the defined urban environment and beyond the established Urban Growth Boundaries (UGB), which are the primary mechanism used by the District Plan to contain and manage urban development. Chapter 4 is explicit that urban development should be avoided outside the UGB, unless it falls within the narrow range of activities considered appropriate in these areas. There are components of the proposal which may not be considered urban development, however as a package in my view, the proposal has not demonstrated that it falls within activities justifiable outside the UGB. As such, the assessment does not address the key strategic requirements of Chapter 4, and the proposal remains inconsistent with the District's adopted approach to urban growth management.

14. QLDC District Plan – Chapter 6 – Landscapes and Rural Character, and Chapter 21 Landscape Schedules

- 14.1. Section 6(b) of the RMA requires all decision-makers to “recognise and provide for ... the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development. In the District Plan, Chapter 3 identifies the landscape outcomes and Chapter 6 establishes the policy framework for managing ONLs and Outstanding Natural Features (ONFs) recognising them as landscapes with the highest level of protection in the district. Chapter 21 includes Priority Landscape Schedules which assist with implementing the objectives and policies in the Plan relating to landscape management for subdivision and development within ONLs in the Rural Zone
- 14.2. In my view the policy planning evaluation has not provided sufficient information to determine whether it has “strong” consistency with the landscapes approach in the district plan as stated in appendix 8. While landscape reporting has been provided, it has not evaluated the relevant Priority Landscape Schedule. This is discussed in the Landscape Peer Review reporting to support the proposal completed for QLDC by Boffa Miskell (attached as Appendix F to the QLDC comments).

15. Summary

- 15.1. The proposal seeks to provide a holistic view in its favour of its alignment with policy documents in order to respond to specific requirements in section 22 of the FTAA. This holistic approach, while understandable in principle, in practice from a QLDC perspective has undertaken limited analysis of key documents, and has included some which are no longer of relevance. Key points are:
- The proposal includes large-scale development (1,333 units, gondola, tourism facilities) with positive aspects such as added housing, the provision of specific affordable housing through the housing trust, and extensive ecological enhancement programme
 - Housing provisions lack detail on affordability, tenure and long term delivery of worker housing; risk of conversion to visitor accommodation remains, and there are significant policy tensions at play relative to alignment with NPS UD policy 1,
 - There is significant strategic misalignment: the site is outside the Urban Growth Boundary and not within any Priority Development Area, conflicting with the Spatial Plan, District Plan and infrastructure planning.
 - NPS-UD alignment is partial and heavily reliant on an unproven gondola system to deliver accessibility and emissions benefits.
 - Infrastructure planning does not anticipate or support growth in this location, creating potential opportunity cost impacts.
 - Ecological and biodiversity effects are uncertain; and the NPS-IB requirements not fully addressed.
 - Key NPS are missing from the assessment (NPS Freshwater, NPS Natural Hazards) despite high hazard exposure, and locations adjacent to waterbodies.

- District Plan conflicts include urban sprawl, rural landscape protection, and development within an Outstanding Natural Landscape.

15.2. Overall, the proposal demonstrates ambition but lacks sufficient detail, fails to address key national and district policy requirements, and is not supported by Policy Planning.



19-02-2026
Reference: 6-XQ191.00_LET_GEO_001
Confidential

Michael Wardill
Queenstown Lakes District Council
Development Engineering, Planning & Development
10 Gorge Road
Queenstown 9300

Powerhouse FTFA2601 – WSP Geotechnical Review

Dear Michael

Further to our recent discussions and your instruction to proceed with a technical review of the geotechnical submission supporting the Fast Track Resource Application (FTFA 2601) for the Powerhouse development project in Queenstown, we are pleased to present our findings and observations for your consideration.

Executive Summary

Based on the review completed we are of the opinion that the current level of investigation and assessment completed is insufficient to determine the actual occurrence, extent and level of significance posed by natural hazards or geotechnical development constraints.

The current assessment does not therefore meet the minimum requirements of Chapter 28 of the QLDC PDP in terms of either determining the significant risk and risk tolerance of the hazards, assessment of the natural hazard risk or management of natural hazard risks.

The current assessment provides preliminary information only and this has been assessed by ORC to meet only a “Level A” Susceptibility Analysis (GNS Landslide Planning Guidance) and does not meet the requirements of a Level B analysis, the minimum level required for a development of this scope and size.

A preliminary natural hazard risk assessment, as required by the ORC Regional Policy Statement has not been presented and the provided report does not consider the potential for multiple or cascading hazards, the effects of climate change, likelihood of different hazard scenarios or other exacerbating factors (including vegetation clearance).

We consider that where the natural hazard risk, either individually or cumulatively, is uncertain or unknown, but potentially significant or irreversible, a precautionary approach to identifying, assessing and managing that risk, by adopting an avoidance or adaptive management response, should be taken.

We are of the opinion that the preliminary report provided by Geoconsulting Ltd identifies the potential for natural hazards and geotechnical hazards to exist that would require substantial investigation, assessment, risk assessment and specific design to mitigate or manage but that the full occurrence or risk associated with the hazards has yet to be ascertained.

Based on our understanding of the site, its associated geological, geotechnical and hydrological conditions, we would consider the risk posed by natural hazards to the proposed development and adjoining land to be greater than low.

Introduction

The FTRA supports an application for an integrated gondola-based transport system, a large residential subdivision development, a recreation park as well as ecological restoration works on Ben Lomond, Bowen Peak and Fernhill in Queenstown.

A previous application for the project was rejected on the basis of “*substantial concerns regarding the project’s feasibility, especially in relation to three-water infrastructure servicing, risks associated with natural hazards, a conflict with QLDC’s Arterial Bypass, and the viability of the proposed ski field*”.

The purpose of this review is to assess the technical aspects of the supporting geotechnical information with particular emphasis on the assessment of natural hazard risk in relation to the proposed QLDC District Plan, Chapter 28, the ORC Regional Policy Statement, the GNS Landslide Planning Guidance and the recently published National Policy Statement for Natural Hazards (December 2025), as well as the Queenstown Lakes District Code of Practice for Land Development and Subdivision.

Provided Information

As part of the review the following key documents have been provided and assessed accordingly:

- Appendix 1B : Applicant Response Document
- Appendix 4 – Preliminary Geotechnical Report
- Appendix 11 – Alpine Chalet Structural Plans
- Appendix 18 – One Mile Powerhouse Reserve Sketches
- Appendix 20 – Proposed Aerial Ropeway Station & Pylon positions
- Appendix 27 – Otago Regional Council comments

The provided information pack details the outline proposal for the scheme to include the following key development proposals:

- Construction and development of three gondola stations and cableway extending from the lower development area of Fernhill, upslope and over both One Mile Creek and Two Mile Creek then crossing over the Ben Lomond Saddle to the upper reaches of Bowen Peak.
- Development of a new viewing platform and landing stations on the upper saddle of Ben Lomond and Bowen Peak.
- Development of a residential development named Fernhill Heights on the slopes of Ben Lomond above Fernhill. The development comprises some 175 chalet type lodge developments and 1333 residential house developments over a 52-hectare area.
- Establishment of two small predator-free sanctuaries within the One Mile Powerhouse Sanctuary (3 hectares) for native bird breeding habitats near Lake Whakatipu and one larger predator-free sanctuary (290 hectare) spanning upper One Mile Creek and Two-Mile Creek valleys.
- Localised improvement and further development of the Two-Mile reserve walkways.

As part of this review no site inspection has been completed, however the general location of the developments is well known to the author.



In addition, given the short review period, no consultation with the Geotechnical report author has been undertaken. Therefore, the review is based entirely on local knowledge and development understanding and review of the provided reports.

Preliminary Geotechnical Assessment (Geoconsulting Ltd), November 2025.

The provided report compiled by Geoconsulting Ltd (Jeff Bryant), provides an early-stage geotechnical assessment for the proposed Fernhill Heights residential development and the aerial cableway connecting the One Mile Powerhouse reserve and Bowen Peak.

The report has been written by Jeff Bryant a local Engineering Geologist based in Queenstown. Whilst the author is not a chartered professional engineer (CPEng) or a chartered engineering geologist (PEngGeol), he does have relevant experience related to land development in the Queenstown District.

As such Mr Bryant does not fully meet the requirements of the QLDC Land Development and Subdivision CoP (Code of Practice) for a Geo-professional. However, several reports and assessments compiled by Geoconsulting Ltd, have been previously reviewed and accepted by QLDC. On this basis Geoconsulting Ltd would be considered a competent local Geo-professional.

The report presents the findings of a “high level” study that seek to address the concerns surrounding natural hazards and act as a “lead in” to a more detailed assessment.

The Geoconsulting Ltd assessment has been based on desk-based research only using available Lidar survey, aerial imagery and hazard mapping compiled by both ORC and QLDC through their respective hazard’s portals.

Geoconsulting Ltd also considered previous investigation and assessment works completed in the general locale from their own archive which includes physical site investigation data on adjoining land at Lochy Road, Queenstown.

No site inspection, aerial reconnaissance or consultation with either ORC natural hazards team or other specialists has been undertaken at this stage.

Geoconsulting Ltd note that the proposed Fernhill Heights development covers a significant area on the mid slope of Ben Lomand and Fernhill. This development calls for progressive development of three prominent mountain spurs and associated valleys (gullies) requiring localised bridging. To facilitate the development widespread vegetation clearance (mostly pine) would be required together with the construction of access roadways, development platforms and installation of associated infrastructure.

Given the general gradients of the existing slopes, it is anticipated that substantial cuts and reprofiling together with retaining of the slopes will be required to facilitate the development.

It is noted in the Geotech report that the anticipated development programme is circa 26 years.

The cable way is proposed to begin at a base station positioned in the Powerhouse Reserve to a mid-level station at Fernhill Heights and an upper station on the Ben Lomond Saddle then terminating at Bowen Peak.

The report provides a summary of the geomorphological and geological conditions of the development areas and notes that the slopes comprise weathered schist on the upper steep slopes, transitioning to blanket coverage of colluvium and glacial till on the mid slopes and varied landslide deposits and debris flow deposits on the lower slopes forming typical alluvial fan forms adjacent to Lake Whakatipu along

both One Mile and Two Mile Creeks respectively. The slopes are currently heavily vegetated with mature pine forest.

As the provided report is “preliminary” the assessment of natural hazard occurrence has been limited to review of hazard maps based on the ORC and QLDC hazard portals, preliminary review of existing Lidar and aerial imagery from sources such as Google Earth. The author notes that initial assessment of aerial imagery requires further investigation and ground truthing once access to the site has been granted.

It is our opinion that assessment of the portal data and current aerial imagery forms a very preliminary, first step in completing an assessment of natural hazard risk. The preliminary assessment therefore only considers the possible occurrence of hazards based on previously mapped occurrence or inferred presence.

The significant existing vegetation cover suggests that landforms such as landslide scarps (both historic or developing) is extremely difficult to distinguish and that Lidar survey data would require substantial processing to ascertain the landform below the existing tree canopy. The current assessment provides no interpretation of survey data or of the existing Lidar data.

Landslide risk assessment, specifically in the Queenstown Lakes District is heavily dependent on understanding the foliation orientation in the schist and recognising geomorphic features associated with similar landslides. Almost no information is presented in the report to support this level of assessment. Large deep-seated landslides would not be unexpected in this terrain and could be a significant impediment to development.

Geoconsulting Ltd accept this limitation and have presented a preliminary assessment of “areas of interest” for further consideration. These interest areas include debris flow / fan deposition areas and identified areas of slope instability.

The mapped geological fault line (Two Mile Fault), which is noted by GNS to be inactive, passes through the Fernhill Heights development area. The report notes that the Fault is probably inactive however its approximate position is marked by notable stepped landforms.

Whilst development over fault lines is not precluded, the approximate trace position and landforms associated with the fault line in this instance together with the limited surficial cover of soils warrant a greater level of consideration. Further analysis of the fault trace and associated landforms may result in assigning a significant stand off or no development zone to the site. An assessment of this risk to the development has not been undertaken.

The provided preliminary report considers the main hazards affecting the proposed development to be:

- Alluvial fan hazards (on the lower slopes)
- Landslide
- Rockfall
- And Other Hazards (namely HAIL site occurrence – former landfill sites)

Additional hazards such as seismic, liquefaction affects, tree slide, wildfire, avalanche and flood have not been considered as part of this assessment.

The report notes the occurrence of landslide and rockfall hazards on the upper and mid-level slopes, especially around the Fernhill Heights development area and the lower portions of the One Mile Creek area together with the occurrence of alluvial fan hazards on the lower slopes. However, the assessment does not present a preliminary natural hazard risk assessment as required by the ORC (Otago Regional Council) RPS (Regional Policy Statement) or recently produced NPS (National Policy Statement). ORC has noted in their appraisal (Appendix 27 – Otago Regional Council comments), that the level of data provided in the Geoconsulting Ltd report would be comparable to a Level A preliminary assessment based on the GNS Landslide Planning Guidance 2024, Susceptibility Analysis.

In addition, the report notes the occurrence of mapped extents of previous slope instability (mapped landslides from existing data portals) and notes areas of interest (based on aerial imagery) with respect to other areas of potential instability.

As such it is our opinion that there would appear to be some doubt over the stability of the site for the proposed residential development.

Geoconsulting Ltd notes that “all structures are shown (figure 4) to lie outside known landslide areas.” However, the report also notes that ground truthing, further detailed assessment and investigation is required to confirm that other areas of interest and areas such as existing steep slopes are assessed as part of future investigations completed at the design stage.

It is our opinion that the area of the Fernhill Heights development is currently heavily vegetated and does exhibit signs of historic landslide occurrence. Given the steep slopes and current knowledge of the geomorphology, the occurrence of other areas of slope instability is likely to be high. The extent, depth and activity of these potentially unstable areas is not known.

It is highly likely that this site, as with many other slopes in this area of the district, will exhibit only marginal levels of stability and that relatively minor levels of disturbance, such as vegetation removal, trenching and excavation for roadway construction, will lead to slope failure and or increased risk of debris flow.

It should be noted that the report identifies the upper development areas for the cableway pylons and viewing platforms are to be located in areas where slope instability has not been observed and no mapped landslides are shown to exist. A review of available aerial imagery for these areas as presented in the report would concur with this early assessment. However, without site inspection and closer examination of the development areas it would be presumptuous to assume that there are no areas of slope instability.

In terms of rockfall risk, particularly in the upper portions of the Fernhill Heights development area, the report does not provide any definitive assessment of risk as the information available is limited and considered speculative.

It is our opinion that rockfall occurrence is most likely ongoing along the upper reaches of the development areas and in more exposed sections of the Ben Lomand spurs. However, the available imagery and mapping completed is insufficient to form any realistic appraisal of risk.

On this basis it is considered likely that rockfall does pose a risk to the development areas and to parts of the cableway system, however the extent of exposure, likelihood and consequence cannot be determined at this stage.

Summary

Geoconsulting Ltd is a local geotechnical consultancy with proven experience and understanding of the local geological conditions around Queenstown. However, the appraisal completed presents the findings of very early, high level, desk-based investigation only, relying heavily on published hazard maps, available aerial imagery and local knowledge of typical ground conditions.

The report concludes that natural hazards including landslide, rockfall, debris flow, alluvial fan hazards and those associated with former HAIL activities (potential contaminated land) do affect the development area.

We would concur with this assessment and agree that the extents of the identified hazards have not been fully ascertained or quantified in terms of the proposed developments, due to the limited nature of the assessment and limited amount of site assessment completed.

In terms of landslide hazards, we are of the opinion that sufficient information exists and is presented within the Geoconsulting Ltd report to determine that the Fernhill Heights development area is likely prone to landslide and future slope instability risk (including rockfall).

This risk has not been assessed as part of the early stage “high level” review and the report presents only the beginnings of a “Level A” Susceptibility Analysis (GNS Landslide Planning Guidance). The current report is unable to present an assessment of true extent, likely occurrence, or consequence, particularly if development was to proceed. Scenario assessments of the risk posed to the site or adjoining land over the anticipated development programme of circa 26 years, once exposed following vegetation clearance or during construction as a result of possible trigger events such as heavy rainfall or earthquake shaking, or consideration of climate change, have also not been considered at this stage.

Given the requirement for large scale vegetation clearance and the existing geomorphology of the mid and upper slopes, combined with the incised gully nature of the slopes and surface run off characteristics of the land around the proposed residential development area, it is our opinion that an increased risk of surficial soil erosion, slope instability and possible debris flow/flood occurrence is likely to exist. This potential hazard would, in our opinion, require substantial mitigation measures to be applied to safeguard adjoining land uses and associated infrastructure.

Based on the current report it is therefore our opinion that significant uncertainty remains regarding the potential occurrence, extent and consequences of landslide/slope instability hazards for various scenarios across the development areas at this time.

Geoconsulting Ltd notes that further work is required to fully determine the extent and occurrence of natural hazards in respect of the proposed developments and that specialist consultants will be required to complete more detailed analysis of the identified hazard impacts and likely mitigation requirements.

In addition, substantial geotechnical investigations and assessments will be required to assess slope instability, determine foundation and road construction cut requirements and enable infrastructure design. Whilst Geoconsulting Ltd considers the development to be feasible, and that there does not appear to be any geotechnical constraints that would preclude development, they do note that the investigations will undoubtedly uncover challenges.

We are therefore of the opinion that the current level of investigation and assessment is insufficient to determine the actual occurrence or extent and level of significance posed by natural hazards or geotechnical development constraints.



The current assessment does not therefore meet the minimum requirements of Chapter 28 of the QLDC PDP in terms of either determining the significant risk and risk tolerance of the hazards, assessment of the natural hazard risk or management of natural hazard risks.

The current assessment provides preliminary information required to complete a Level A Susceptibility Analysis (GNS Landslide Planning Guidance) but does not meet the requirements of a Level B analysis, the minimum level required for a development of this scope and size.

The assessment completed does not provide a preliminary risk assessment as required by the ORC RPS (Proposed Regional Policy Statement) and does not consider the potential for multiple or cascading hazards, the effects of climate change, likelihood of different hazard scenarios or other exacerbating factors (including vegetation clearance).

On this basis the ORC RPS recommends, that where the natural hazard risk, either individually or cumulatively, is uncertain or unknown, but potentially significant or irreversible, apply a precautionary approach to identifying, assessing and managing that risk by adopting an avoidance or adaptive management response.

We are of the opinion that the preliminary report provided by Geoconsulting Ltd identifies the potential for natural hazards and geotechnical hazards to exist that would require substantial investigation, assessment, risk assessment and specific design to mitigate or manage but that the full occurrence or risk associated with the hazards has yet to be ascertained.

Based on our understanding of the site, its associated geological, geotechnical and hydrological conditions, we would consider the risk posed by natural hazards to the proposed development and adjoining land to be greater than low.

We trust the above is sufficiently comprehensive for your present requirements and addresses the concerns raised with respect to natural hazards and geotechnical aspects of the site.

Should you require any further information or have any additional queries please do not hesitate to contact us.

Kind Regards,

A handwritten signature in blue ink, appearing to read 'Rob Bond'.

Rob Bond
Technical Principal - Geotechnical Engineering



Review of Economic Assessments for
Powerhouse Fast Track Application

19 February 2026

m.e
consulting



Review of Economic Assessments for Powerhouse Fast Track Application

Prepared for



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Executive summary

This report reviews the updated economic assessment supporting the revised Fernhill Heights and aerial ropeway proposal located in Queenstown. The purpose of the review is to evaluate whether the quantified and qualitative economic benefits presented are robust, proportionate, and suitable for consideration within the Fast-track Approvals Act (FTAA) referral context, having regard to the changes introduced in the revised proposal.

The revised scheme incorporates materially different transport infrastructure, increased residential unit numbers (from 1,040 to 1,333 dwellings), and refined composition of the Powerhouse Precinct. While these changes have the potential to influence economic outcomes, the updated economic assessment does not consistently revisit or re-quantify key assumptions to reflect the revised scale, configuration, and delivery pathway. As a result, there are several areas where the evidence base remains incomplete or uncertain.

With respect to housing, the additional dwellings would contribute positively to supply; however, available evidence indicates that district-wide housing capacity is projected to be sufficient over the long term, with short-term constraints primarily driven by infrastructure limitations rather than plan-enabled capacity. Consequently, the incremental housing benefits of the proposal should be interpreted as contributing to supply diversity and timing rather than fundamentally altering long-term housing sufficiency outcomes. The affordable housing and worker accommodation components provide targeted social benefits for specific cohorts but are modest relative to district-wide need and are not fully quantified in economic terms.

Construction and development activity associated with the project would generate temporary economic effects over the delivery period, potentially extending across multiple decades under the revised staging assumptions. However, the updated assessment does not provide confirmed capital expenditure estimates or a clear separation between residential, transport, and precinct investment components, limiting the ability to quantify construction-phase GDP and employment impacts. Once investment values are confirmed, it is recommended that standard input-output modelling be applied to estimate these effects.

Estimates of resident population growth, labour force participation, and associated GDP contributions are arithmetically reasonable but primarily reflect population-enabling effects rather than net new economic productivity attributable to the development itself. Many future residents would likely locate elsewhere within the district or region in the absence of the proposal, meaning the benefits should be interpreted as facilitating capacity rather than creating entirely new economic activity.

Transport and visitor-related benefits represent a major component of the claimed economic impacts. The revised ropeway network introduces higher theoretical capacity and broader integration than the earlier proposal; however, demand estimates and visitor expenditure assumptions largely replicate earlier modelling without fully reassessing utilisation, substitution effects, or integration with the existing transport and tourism system. Reported visitor expenditure figures are presented on a gross basis and have not been translated into regional value-added or employment impacts using economic modelling frameworks. In addition, potential displacement of spending from existing attractions and hospitality areas has not been explicitly addressed, meaning net economic benefits may be lower than reported totals.

Overall, the proposal has characteristics consistent with a potentially significant regional project, including integrated housing, transport, tourism, and ecological restoration components. However, due to gaps in the updated economic evidence, particularly regarding capital investment, demand validation, net visitor impacts, staging, and implementation of worker accommodation, it is not currently possible to robustly determine the magnitude of net economic benefits attributable to the revised proposal. Further analysis would be required to provide confidence in the scale, timing, and distribution of economic effects relevant to FTAA referral considerations.



1 Background

Queenstown Lakes District Council (QLDC) has commissioned Market Economics (ME) to undertake an independent peer review of the Economic Assessment submitted in support of the revised fast-track referral application for the Powerhouse development (FTAA-2511-1126).

The revised application represents a re-lodgement of the earlier 'Bowen Peak' fast-track application (FTAA-2502-1025), which was declined. The current proposal has been updated and renamed the 'Powerhouse' application for ease of reference. It is supported by additional technical material and a more detailed suite of expert reports, including an updated Economic Assessment (Appendix 10).

The proposal comprises a gondola-based ropeway transport system across Bowen Peak and Fernhill, including three contiguous ropeways and four stations; a chalet-style residential development and subdivision; recreation facilities supporting skiing, snow sports, mountain biking and walking; and an ecological restoration programme including wilding pine removal and native replanting, as well as predator-free sanctuaries. From an economic perspective, the application advances claims relating to regional tourism growth, employment, regional GDP, housing supply, and broader regional development benefits.

QLDC's role at this stage is to provide an initial response to the referral application under section 22 of the Fast-track Approvals Act 2024 (FTAA). The purpose of this peer review is to assess the robustness, credibility, and decision-usefulness of the economic evidence presented, to inform QLDC's response.

The primary documents reviewed for the purposes of this peer review are:

- Powerhouse Fast-track Application – Appendix 1A: FTAA Section 22 Requirements;
- Powerhouse Fast-track Application – Appendix 1B: Applicant Response;
- Powerhouse Fast-track Application – Appendix 6: Bowen Peak Ski Area Feasibility Report;
- Powerhouse Fast-track Application – Appendix 10: Economic Assessment;
- Powerhouse Funicular – Notice of Decisions Letter (relating to FTAA-2502-1025).

The principal focus of this review is Appendix 10 (Economic Assessment), read in conjunction with Appendix 1A (Section 22 Requirements). The remaining documents have been reviewed to provide context and to understand the broader evidential basis for the economic conclusions advanced.

1.1 Approach Taken in the Updated Economic Assessment and Review Methodology

Appendix 10 does not constitute a fully reissued or comprehensively updated economic assessment. Instead, it provides a supplementary update to the earlier Economic Assessment prepared in support of the February 2025 'Bowen Peak' fast-track referral application. The updated document identifies changes to the project specifications considered material to the economic analysis and presents revised headline conclusions, while relying largely on the analytical framework, modelling structure, and baseline assumptions established in the original report.

Commented [SG1]: Can we start with an Exec Summary please. Copy/paste of the conclusion if necessary!

Thanks.



Accordingly, the majority of the detailed modelling and benefit analysis remains contained in the earlier 'Bowen Peak' assessment. Appendix 10 primarily identifies specification changes and indicates how these are reflected in updated results, rather than re-presenting a fully integrated reassessment of the development as now proposed.

While this approach maintains continuity with the earlier analytical framework, it has implications for transparency and interpretability. Where key components of the project have changed in scale, configuration, or composition, reliance on an earlier modelling structure may make it more difficult to clearly identify the incremental effects of those changes, assess potential interactions between project elements, and confirm that embedded assumptions remain appropriate. In circumstances where the earlier assessment was based on components that have since been modified or removed, aspects of the original analysis may not directly correspond to the development now proposed in 'Project Powerhouse'.

In light of this structure, this peer review proceeds by first identifying the key specification changes since FTAA-2502-1025 (Section 2). Sections 3 to 5 then focus on the core analytical components of the original assessment, namely:

- Benefits Assessment of Project Elements Related to the Powerhouse Precinct;
- Benefits Assessment of Project Elements Related to the Fernhill Heights Suburb (including funicular access); and
- Benefits Assessment of the Saddle funicular and associated recreation and nature experiences.

These sections are examined in detail, with the relevant specification changes identified in Appendix 10 applied and assessed in context. Section 6 considers the project's relevance to the FTAA, including the Section 22 referral framework. Section 7 sets out overall conclusions.

This peer review does not re-run or replicate the applicant's modelling. Rather, it evaluates the methodological rigour, evidential basis, completeness, and proportionality of the economic assessment, and considers the extent to which it addresses matters identified in the previous decision to decline the 'Bowen Peak' application.



2 Key Changes Since FTAA-2502-1025

Appendix 10 identifies several structural changes to the project specifications since the earlier 'Bowen Peak' fast-track application that are potentially material to the economic assessment. These include:

- **The housing component has been reconfigured and expanded.** The earlier application included a total of 1,040 housing units in Fernhill Heights (comprising 250 large and 20 paired smaller chalets). The revised application provides for 1,333 housing units across 175 chalet buildings, representing a net increase of 293 units. This change has implications for construction impacts, population effects, infrastructure demand, and associated economic modelling assumptions.
- **The transport system has been materially revised.** The earlier proposal relied on a combination of funicular railways from the Powerhouse Precinct to Fernhill Heights and onward to the Saddle, followed by a chairlift to Bowen Peak. The revised proposal replaces this configuration with three contiguous ropeway systems along broadly similar corridors. The applicant indicates that ropeway systems may offer higher passenger carrying capacity relative to the previously proposed funicular system, depending on final specifications. Changes in transport technology and capacity have potential implications for projected visitation, throughput, and associated economic effects.
- **The composition of the Powerhouse Precinct has changed.** The earlier proposal included both a commercial (retail and hospitality) precinct and a Convention Centre. The Convention Centre component has been removed from the revised application, while retail and hospitality activities remain. This adjustment alters the mix and scale of anticipated commercial activity underpinning parts of the economic case.

This review considers whether these specification changes materially affect the scale, composition, and robustness of the economic benefits advanced in the updated assessment.



3 Benefits of Project Elements Related to the Powerhouse Precinct

The following section outlines the key assumptions and benefits originally detailed in Sections 3.1 and 3.2 of the February 2025 'Bowen Peak' assessment and summarises how the revised Powerhouse proposal has modified these figures, before making additional comments. This provides the foundation for assessing whether the core economic logic for the Powerhouse Precinct remains valid under the revised proposal configuration.

3.1 Summary of Section 3.1 & 3.2 - Original Assumptions & Benefits

The original assessment for the Powerhouse Precinct was built around a high-capacity commercial and events hub. The core assumptions included:

- **Commercial Activity:** A mix of retail and hospitality businesses with a gross floor area of 3,000 m².
- **Event Infrastructure:** The establishment of the Powerhouse International Convention Centre (PICC) with a 1,500 m² auditorium designed for up to 1,500 delegates.
- **Land Use:** Removal of wilding pines and replacement with native plantings and predator-free fencing to create a "native theme park" style precinct.

Benefits were primarily driven by the introduction of large-scale business events to the Queenstown region.

- **Economic Contribution:** The precinct was expected to generate \$127 million in annual spending, with \$100 million of that directly linked to PICC delegates.
- **Employment:** The original plan supported 175 permanent jobs within the precinct (75 in retail/hospitality and 100 for the convention centre).
- **Delegate Volume:** Assumptions were based on hosting 39,000 delegates per year, requiring the capture of less than 1% of the Australian business events market.

As a result, the economic case for the Precinct was highly dependent on the Convention Centre component, which accounted for the majority of the projected expenditure and employment outcomes.

3.2 What Remains Valid for the Powerhouse Precinct Assessment

The removal of the Convention Centre from the revised proposal materially alters the scale and composition of the economic benefits previously attributed to the Powerhouse Precinct. Consequently, a substantial proportion of the original quantified benefits are no longer applicable to the current proposal. A number of elements relied upon in the earlier assessment are therefore no longer relevant, including:



No longer applicable

- 2,500 m² Convention Centre floorspace
- Approximately 39,000 delegates per year
- Approximately \$100 million per annum in delegate-related expenditure
- Approximately 100 Convention Centre jobs
- A structured carparking building for 500 vehicles
- The combined Precinct spending estimate of approximately \$127 million per annum
- The total Precinct employment estimate of approximately 175 jobs

Potentially still applicable (subject to assumptions and utilisation levels)

- 3,000 m² retail/hospitality GFA
- ~\$27m annual retail/hospitality spending
- ~75 retail/hospitality jobs
- Sanctuary and themed positioning
- Integration with electrified ropeway network

The remaining quantified benefits are therefore largely contingent on visitor utilisation of the retail and hospitality components, which in turn depends on assumptions regarding ropeway throughput, visitor behaviour, and precinct capture rates. The validity of these assumptions, and the resulting impact estimates, are examined in the following section.

3.2.1 Employment Impacts

The original assessment estimated that the proposed 3,000 m² of retail and hospitality floorspace could support approximately 75 jobs, based on an assumed average of around 40 m² per employee. This represents a reasonable order-of-magnitude estimate. For context, the Queenstown Lakes Housing and Business Development Capacity Assessment (HBA 2025) applies employment density ratios of approximately 20 m² of gross floor area (GFA) per worker for Commercial and 40 m² GFA per worker for retail, which imply employment outcomes broadly consistent with those presented, depending on the eventual activity mix within the precinct and the level of visitor utilisation achieved.

3.2.2 Customer Capacity and Floorspace Assumptions

The original assessment states that ME identified in the HBA 2017; *“an average of 3.4 square metres of commercial space is required in Queenstown Lakes to satisfy demand by the local population and visitors to the District”*. This figure is incorrect and is not supported by the HBA 2017. Instead, the value “3.4” appears to originate from a different context within that report. ME identified that, overall QLDC required 3.4 hectares of additional retail land over the short term across the district to meet demand. The value is in hectares and has nothing to do with, and cannot be used as a floorspace-per-person benchmark. As noted in the previous section, the 2017 HBA is not the latest assessment; it has been superseded by the HBA 2025, which provides the most current analysis of the District’s commercial land requirements.

Commented [SG2]: What is M.R a reference to here?

Also do you need to mention that the BDCA has been replaced with the 2025 version?



Conceptually, the application of a district-wide floorspace provision metric to estimate how many customers can be “comfortably catered for at any time” is **weak**, as it conflates measures of long-run supply adequacy (measured in hectares) with instantaneous occupancy capacity (measured in m²). Notwithstanding this limitation, if the precinct were assumed to provide 3,000 m² of retail and hospitality space and a notional density of 3.4 m² per person were applied, this would imply capacity for approximately 880 persons at any one time (rounded to 1,000 in the report). Industry benchmarks for hospitality seating (approximately 1.2–1.8 m² per patron)¹ and retail browsing (approximately 2–5.6 m² per patron)² indicate that an instantaneous capacity in the order of 900–1,000 people is not inherently unreasonable.

Commented [SG3]: ‘not defensible’ or ‘not justifiable’ perhaps, rather than *wrong*?

However, the methodology used to derive this figure is not technically robust, the outcomes are coincidentally the same, therefore the conclusions are not supported by appropriate analysis.

3.2.3 Visitor Spending Assumptions and Implications of Revised Transport Capacity

The estimate of approximately \$27 million per annum in retail and hospitality expenditure is derived from a visitor throughput calculation linked to the Saddle transport system. The original assessment indicated that the Saddle funicular could carry at least 1.1 million passengers per year (approximately 3,000 per day), comprising around 1,000,000 sightseeing and recreation users and approximately 100,000 skiers. It was assumed that over 90% of these passengers would be visitors to Queenstown Lakes, equating to an average of approximately 2,750 visitors per day. Applying an assumption that around 50% of these visitors would utilise the Powerhouse Precinct results in approximately 1,375–1,500 daily users. At an assumed average spend of \$50 per visitor, this yields approximately \$75,000 per day, or around \$27 million per annum.

The assumed \$50 per visitor expenditure is based on applying approximately 12% of average daily international visitor spending (approximately \$444 per day³) to a single dining and retail occasion. While the use of a national-level average daily expenditure figure is broadly plausible — particularly given Queenstown’s premium pricing environment — the derivation of the Precinct spending share is not strongly evidenced. In particular:

- The assumption that the Precinct would capture roughly one-third of daily dining activity for a large share of visitors lacks behavioural support.
- The estimate does not explicitly account for competition from established hospitality areas within Queenstown — therefore the **transfer** and displacement effects appear to have been ignored.
- Visitor mix, price positioning, and trip purpose could materially influence realised spending levels.

Commented [SG4]: Add ... transfer “or ‘displacement’”?

Accordingly, the \$50 per capita spending assumption should be regarded as indicative rather than robust.

¹ www.nisbets.co.uk/how-much-space-need-open-restaurant

² www.researchgate.net/publication/264827215 Probabilistic assessment of the occupant load density in retail buildings

³ Efforts were made to verify the assumed average daily international visitor spend of approximately \$444 per day. An exact corresponding figure could not be identified within the publicly available International Visitor Survey (IVS) data. The value is therefore most likely a derived or modelled estimate, although the underlying calculation method is not documented and the figure could not be independently reproduced. For context, IVS releases (Year ended June 2024 and June Quarter 2024) indicate a national median daily spend across all countries of approximately \$284 per visitor. Visitors from the United States recorded the highest daily spend at approximately \$342, followed by Asia at approximately \$309 and Australia at approximately \$294 per day.



More importantly, the revised proposal replaces the previously proposed funicular system with higher-capacity ropeway infrastructure. Indicative industry specifications suggest that 10-passenger gondola systems can carry approximately 3,000 passengers per direction per hour, compared with approximately 780 passengers per direction per hour for the previously proposed Funicular system. This represents a potentially substantial increase in transport throughput capacity relative to the assumptions underpinning the original economic modelling.

The earlier spending estimates implicitly relied on a particular relationship between transport capacity, visitor numbers, and Precinct utilisation (including the assumption that approximately 50% of visitors would use the Precinct). The updated assessment does not clearly revisit these utilisation assumptions in light of the materially higher potential carrying capacity of the ropeway system.

If visitor throughput were to increase without a proportional increase in precinct floorspace or service capacity, the proportion of visitors able to utilise the precinct could decline. In this circumstance, total precinct expenditure would not necessarily increase and could remain similar to, or lower than, the previously estimated \$27 million per annum. Conversely, if higher transport capacity generated additional destination visitation and higher utilisation of the precinct, expenditure could increase.

The net effect is therefore uncertain and is not explicitly analysed in the updated assessment.



4 Benefits of Project Elements Related to Fernhill Heights Suburb

The following section outlines the key assumptions and benefits originally detailed in Sections 4.1 and 4.2 of the February 2025 'Bowen Peak' assessment and summarises how the revised 'Powerhouse' proposal has modified these figures, before making additional comments. This provides the foundation for assessing whether the core economic logic for the Fernhill Heights Suburb remains valid under the revised proposal configuration.

4.1 Summary of Section 4.1 & 4.2 — Original Assumptions & Benefits

The original assessment for the Fernhill Heights component was built around the establishment of a new alpine-style residential suburb integrated with the transport system and recreation amenities. The core assumptions included:

- **Residential Development:** Construction of approximately 1,040 housing units comprising 250 large alpine chalets (containing four apartments each) and 20 paired smaller chalets, delivering a total of 3,080 bedrooms.
- **Affordable Housing Provision:** Transfer of approximately 5% of residential allotments to the Queenstown Lakes Community Housing Trust to support delivery of affordable housing.
- **Resident Population:** An estimated resident population of at least 2,180 people, derived using an assumed average household size of 2.89 persons per dwelling and allowing for approximately 27.5% of dwellings to remain unoccupied, reflecting the district's high prevalence of holiday homes and visitor accommodation. The assessment noted that higher occupancy rates could be achievable within Fernhill Heights given integrated transport access and affordable housing provision, which could increase the resident population to approximately 2,593 people.
- **Delivery Programme:** A staged construction programme commencing around 2027 and extending over approximately 10 years.
- **Transport Integration:** Direct connection to the Powerhouse Precinct and wider transport network via the proposed electrically powered Suburban Funicular Railway, with an indicative carrying capacity of approximately 500 passengers per hour per direction and an estimated capital cost of approximately \$60 million. The original assessment indicated that approximately half of this investment would comprise local construction activity associated with installation of the railway, with the remaining share relating to imported system components, design, and specialist equipment supplied by a Swiss manufacturer (indicatively Garaventa), including rails, funicular vehicles, and associated engineering inputs (approximately CHF 15 million).

Benefits were primarily driven by additional housing supply, construction activity, improved transport accessibility, and the contribution of new residents to the local labour force and economy.



- **Resident Population:** The development was estimated to accommodate at least 2,180 residents under conservative occupancy assumptions (refer assumptions section), with potential to increase to approximately 2,593 residents if higher dwelling occupancy were achieved due to integrated transport access and affordable housing provision. On current project parameters, this would also enable approximately 52 housing units to be delivered by the Queenstown Lakes Community Housing Trust.
- **Construction and Development Activity:** Significant one-off economic impacts were anticipated from planning, infrastructure provision, site preparation, and building activity over the 10-year development period, including substantial investment associated with the proposed transport infrastructure.
- **Workforce and Economic Contribution** Based on workforce participation equivalent to 65.9% of residents, it was estimated that approximately 1,436 Fernhill Heights residents could participate in the labour force. Applying an average productivity level of approximately \$134,492 GDP per job, these workers could collectively support around \$193 million in annual GDP contribution to the local economy once fully realised.
- **Transport and Accessibility Benefits:** Integration with the Suburban Funicular was suggested to support access to employment, education, and services while enabling comparatively high levels of public transport use. The funicular's capacity to carry approximately 1,250 residents during the morning peak (6:30–9:00am) equates to nearly 60% of Fernhill Heights residents regularly using public transport, compared with long-term mode-share targets of 35% to 50%. The transport connection would also improve access to nearby employment concentrations, including the approximately 10,000 workers currently located in central Queenstown, as well as education opportunities for students via existing and future public transport links. In addition, improved connectivity could also generate broader social wellbeing benefits, due to convenient access to outdoor activities, including skiing and biking.

These combined effects formed the basis of the original socio-economic rationale for the Fernhill Heights component of the 'Bowen Peak' proposal.

4.2 What Remains Valid for the Fernhill Heights Suburb Assessment

The revisions to the proposal affect both the transport configuration and, to a lesser extent, the scale and form of the residential development. However, the fundamental drivers of the Fernhill Heights economic assessment, namely additional housing supply, construction activity, and the contribution of new residents to the local labour force, remain broadly comparable to those identified in the original assessment.

A number of elements relied upon in the earlier 'Bowen Peak' assessment remain applicable to the current proposal, while others are more sensitive to delivery assumptions.

No longer applicable

- Approximately 1,040 housing units in the original chalet configuration
- Approximately 3,080 bedrooms associated with the earlier dwelling typology
- Original chalet mix assumptions (250 large chalets plus 20 paired smaller chalets)



- Original estimated resident population of 2,180–2,593 people derived from the 1,040-unit scenario
- Workforce and GDP contribution estimates (~1,436 workers and ~\$193 million GDP) based on the earlier dwelling yield
- Original Suburban Funicular specification (~500 passengers per hour per direction) and associated peak-period transport capacity assumptions (~60% of residents transported over a 2.5-hour morning peak)
- Transport benefit estimates tied specifically to the earlier funicular infrastructure and utilisation assumptions

Potentially still applicable (subject to revised scale and updated transport assumptions)

- Residential development at the revised scale of approximately 1,333 housing units (an increase of 293 dwellings relative to the earlier proposal), comprising 2-, 3-, and 4-bedroom units across approximately 175 chalet structures
- Additional housing supply contribution to Queenstown Lakes growth pressures, with an estimated resident population of at least approximately 2,794 people, increasing to around 3,324 people under higher occupancy assumptions
- Affordable housing provision mechanism (approximately 5% of dwellings), which could enable delivery of affordable units through the Queenstown Lakes Community Housing Trust, together with the proposed 50% allocation for key worker accommodation
- The original proposal assumed a staged construction programme for Fernhill Heights commencing around 2027 and extending over approximately 10 years. The updated economic assessment does not specify a revised delivery timeframe; however, Appendix 1A (FTAA Section 22 Requirements) refers to construction of the station buildings, aerial ropeways, and the Fernhill Heights residential area occurring over a substantially longer 28-year programme. This materially extends the construction horizon and has implications for the timing and staging of economic benefits. Accordingly, the original 10-year assumption should be treated as superseded, with updated delivery timeframes requiring confirmation in light of the revised development scale.
- Resident population and labour force contributions (likely larger in absolute terms than previously estimated due to the increased dwelling numbers, subject to recalibration)
- Transport accessibility benefits arising from integration with the Powerhouse Gondola, including substantially higher carrying capacity relative to the earlier funicular concept (with potential to transport up to 100% of residents within an hour across morning peaks)
- Improved access to employment, education, and services, including central Queenstown labour markets
- Social wellbeing benefits associated with proximity to outdoor recreation opportunities, with convenient access directly from each resident's front door into outdoor activities, including skiing and biking

The following section examines the quantified benefits associated with the Fernhill Heights component, having regard to the revised scale of the residential development and the updated transport infrastructure provision.



4.2.1 Contribution to Housing Supply and Capacity

There is no dispute that the proposed Fernhill Heights residential development would increase the supply of housing within the district. However, the extent to which this translates into a material net benefit depends on the broader housing sufficiency context, including the location and type of that supply, existing plan-enabled capacity and the timing of delivery relative to projected demand.

Commented [SG5]: And the location & type of that supply?

The most recent evidence base is the Queenstown Lakes District Council Housing and Business Development Capacity Assessment (HBA 2025), which provides a comprehensive assessment of housing demand alongside plan-enabled, infrastructure-serviced, feasible, and reasonably expected development capacity across the district.

Key findings relevant to the Whakatipu Ward (where Fernhill Heights is located) include:

- **Short term (2023–2026):** An overall district shortfall of approximately 1,000 dwellings, driven primarily by infrastructure constraints in Whakatipu (around 1,200 dwellings). This reflects near-term servicing limitations rather than a lack of zoned or plan-enabled capacity.
- **Medium term (2023–2033):** With planned infrastructure investment, the district is projected to move into a substantial overall surplus position (approximately 6,100 dwellings). Some localised mismatches between housing typologies remain, but aggregate capacity is sufficient.
- **Long term (2023–2053):** The district is projected to maintain an overall surplus of approximately 2,800 dwellings, although there may continue to be localised shortfalls in particular locations or dwelling typologies, particularly in infrastructure-constrained central Whakatipu areas. In addition, there are other housing developments in Queenstown that will contribute to the district's housing supply in the long term. For example, the Homestead Bay development has been approved under the fast-track consenting process to develop approximately 2,800 residential allotments

Commented [SG6]: Do we need to acknowledge that Homestead Bay has now been given the green light?

Importantly, the Fernhill Heights development is proposed to be delivered progressively over an approximately 10-year period, meaning that the majority of dwellings would enter the market during the medium- to long-term horizons, when the district is already projected to have sufficient or surplus capacity overall.

Accordingly, while the proposal would make a positive contribution to housing supply, the incremental benefit to district-wide housing sufficiency is likely to be small to moderate rather than transformational, given that existing planning frameworks already anticipate adequate long-term capacity subject to infrastructure delivery.

4.2.2 Affordability and worker accommodation

Housing affordability is a persistent and district-wide issue, reflecting a combination of rapid population growth, constrained land supply in high-amenity locations, elevated construction costs, and strong investor and visitor accommodation demand. The HBA 2025 reinforces this position, noting that despite projected long-term housing surpluses at a district level, shortfalls in capacity within lower dwelling value bands are expected to remain. As a result, affordability challenges are unlikely to be materially resolved by any single development in isolation. Proposed updates to the planning framework are also expected to significantly increase development opportunities and housing choice over time.



The revised Fernhill Heights proposal includes two elements relevant to affordability outcomes:

- **Affordable housing provision:** Approximately 5% of dwellings allocated to the Queenstown Lakes Community Housing Trust. This would provide targeted support for a specific cohort of eligible households and represents a positive social outcome. However, at around 67 dwellings under the revised 1,333-unit scheme, the scale remains modest relative to district-wide need and waiting list pressures.
- **Worker accommodation (50% designation):** The revised proposal indicates that approximately half of dwellings would be designated for key worker accommodation. While this has the potential to support labour market functioning and improve access to housing for employed residents, the magnitude of the economic impact depends heavily on implementation details (e.g. tenure, pricing, eligibility, and retention mechanisms), which are not quantified in the updated economic assessment.

Overall, the affordability benefits should therefore be characterised as targeted and potentially beneficial for specific groups, rather than materially altering district-wide affordability dynamics.

4.2.3 Economic Impacts Construction and Development Activity

It is agreed that the development of Fernhill Heights would generate economic activity associated with planning, engineering, infrastructure provision, site preparation, vertical construction, and transport system delivery. These effects are typically one-off (temporary) impacts occurring over the construction period rather than ongoing structural additions to the economy.

The original assessment indicated substantial investment associated with both the residential development and supporting transport infrastructure (including the gondola system and associated works). However, the revised application does not provide a fully quantified estimate of total capital expenditure attributable specifically to the Fernhill Heights component, nor a detailed breakdown separating residential, transport, and wider Powerhouse Precinct investments. This limits the ability to independently verify the scale of construction-phase economic impacts.

Once capital cost estimates are confirmed, IO modelling could be applied to estimate construction-phase GDP, employment, and value-added effects. This step has not been undertaken in the updated assessment, limiting the ability to assess the magnitude of potential construction impacts.

4.2.4 Resident population and labour force contributions

The revised proposal is anticipated to accommodate at least 2,794 residents under conservative occupancy assumptions, with potential to increase to approximately 3,324 residents under higher occupancy scenarios.

Previous analysis translated this population into potential labour force participation and GDP contributions by applying district workforce participation rates and average productivity per worker. The updated assessment does not explicitly revisit or emphasise this analytical approach; however, if the same method were applied to the revised population estimates, a proportionally larger labour force and associated GDP contribution would be implied due to the increased dwelling numbers.



While arithmetically valid, it is important to recognise that these economic outputs primarily reflect population growth effects, rather than productivity gains generated by the development itself. The additional residents would largely represent people who would otherwise live elsewhere within the district or region if housing were available. Consequently, the estimated labour supply and GDP contributions should be interpreted as relocation and capacity-enabling effects, rather than net new economic activity attributable solely to the project.

4.2.5 Transport accessibility benefits

The revised proposal places significant emphasis on the capacity and throughput of the proposed gondola system, including the ability to move a large share of Fernhill Heights residents within relatively short peak periods. This demonstrates that the system could be technically efficient in transporting passengers.

However, transport benefits depend not only on system capacity but also on network context, including:

- existing transport demand patterns,
- current congestion points and bottlenecks (particularly road network constraints in the Whakatipu Basin),
- integration with existing public transport services,
- destination accessibility, and
- behavioural uptake by users.

The current assessment focuses primarily on theoretical carrying capacity rather than demonstrating:

- where current transport constraints occur,
- how the proposed system would materially reduce those constraints,
- how passengers would integrate with the wider transport network upon arrival, and
- whether sufficient downstream network capacity exists to absorb redistributed demand.

Without this network-level analysis, the magnitude of transport benefits remain uncertain. The system may provide meaningful local accessibility improvements for residents and reduce reliance on private vehicles for some trips, particularly for connections to the Powerhouse Precinct and central Queenstown employment areas. However, broader congestion relief or network performance improvements cannot be assumed without detailed transport modelling demonstrating modal shift outcomes, vehicle trip reduction, travel time savings, and system integration effects.

Accordingly, the transport benefits are best characterised at this stage as potential accessibility enhancements, with the scale of wider network benefits dependent on integration and demand outcomes that have not yet been fully demonstrated.



5 Benefits of the Transport Network and associated recreation & nature experiences

The following section examines the transport and recreation components of the proposal, with particular focus on the changes introduced through the revised design and the implications for the previously identified economic benefits. Transport infrastructure is a central enabling element of the overall development, influencing visitor access, residential connectivity, utilisation of the Powerhouse Precinct, and the feasibility of associated recreation and sanctuary experiences. The following subsection first outlines the key differences between the original and revised transport concepts before considering the implications for demand assumptions and benefit estimates.

5.1 What changed since the revised proposal

The transport component represents one of the most substantive changes in the revised proposal. The original concept centred on funicular connections between the Powerhouse Precinct, Fernhill Heights, and the Saddle, with a separate chairlift for skiing access, whereas the updated proposal introduces an integrated aerial ropeway network with multiple segments, stations, and expanded recreation access. The discussion below focuses primarily on the changes to the visitor-facing transport system and associated recreation infrastructure. The key changes are summarised in Table 1.

Table 1: Key Changes Between Original Funicular Proposal and Revised Aerial Ropeway Network

Feature	Original Proposal (Saddle Funicular)	Updated Proposal (Aerial Ropeway Network)
Core Transport System	Funicular railway connecting Powerhouse Precinct to Fernhill Heights and the Saddle.	Three contiguous aerial ropeways: Powerhouse Gondola (10-PAX), Saddle Funifor (110-PAX), and Bowen Peak Gondola (10-PAX).
Passenger Capacity	Funicular: 770 passengers per hour per direction.	Expanded network with higher-capacity Funifor (110-PAX) and additional gondola segments.
Investment	\$94 million funicular + \$25 million chairlift.	Not specified but reflects a more extensive infrastructure network.
Stations	Top station only at Saddle.	Four stations: Powerhouse, Fernhill Heights, Saddle, and Bowen Peak — each with expanded facilities.
Bowen Peak Access	Chairlift for skiing and mountain biking.	Gondola (10-PAX) to discreet station with viewing platform, providing access to seasonal recreation.
Predator-free Sanctuaries	One 180-hectare sanctuary accessed via funicular.	Expanded: 275+ hectare Te Taumata o Hakitekura Sanctuary supporting kiwi, takahē, kākāpō, and other native species.
Walking Access	Fibreglass boardwalk from Powerhouse to Mid-Way Clearing.	Extended: Elevated boardwalk from Powerhouse to Fernhill Heights along One Mile Creek, with extension into Two Mile Creek valley to Sanctuary entrance.



5.2 Demand Assumptions and Economic Contribution

5.2.1 Demand Assumptions and Transport Capacity

Despite the substantial changes to the transport system configuration and potential carrying capacity, the updated economic assessment broadly retains the same demand assumptions as the earlier proposal. The rationale provided is that both systems would deliver a similar visitor experience and therefore generate similar levels of demand. However, this equivalence is not fully supported when considering infrastructure capability and market context.

Modern detachable gondola systems with 10-passenger cabins commonly achieve throughputs of up to approximately 3,000 passengers per hour per direction under optimal operating conditions, which is materially higher than the approximately 770 passengers per hour per direction assumed for the original funicular. While the revised Saddle Funifor segment itself may not operate at gondola-level throughput, the overall network introduces significantly greater theoretical transport capacity than the original concept. Consequently, assuming unchanged visitor volumes without further justification introduces uncertainty regarding both utilisation rates and demand constraints.

The assessment continues to estimate approximately 1.1 million passengers per year (around 3,000 per day), comprising approximately 1.0 million sightseeing, biking, and sanctuary visitors and approximately 100,000 ski-related passengers. It is further assumed that more than 90% of passengers would be visitors to the Queenstown Lakes District, equating to approximately 2,750 visitors per day.

5.2.2 Visitor Expenditure and Net Economic Effects

Visitor expenditure associated with the transport system and related activities is estimated at approximately \$120 million per annum. This figure is derived by assuming:

- 90% of passengers are visitors
- The experience extends visitor stays (half a day for non-skiers and a full day for skiers)
- Approximately half of the additional visitor spending during this extended stay is attributable to the ropeway and associated activities

The use of a daily visitor expenditure benchmark (approximately \$444 per day) provides a broadly plausible order-of-magnitude reference for Queenstown, given its premium tourism positioning. However, an important limitation of the analysis is that it implicitly assumes that the majority of activity represents net new visitation to the district.

Queenstown already contains a wide range of established visitor attractions and ski field experiences, including existing gondola infrastructure and alpine recreation offerings. As a result, a proportion of demand for the proposed ropeway network would likely reflect substitution or displacement effects, where visitors reallocate time and expenditure from other local activities rather than extending their stay or increasing total spending. To the extent that this occurs, the \$120 million estimate represents gross expenditure associated with the



activity rather than net additional economic benefit to the district. The same consideration applies to the previously discussed \$27 million Powerhouse Precinct visitor spending estimate.

Furthermore, the expenditure figures are presented as gross visitor spending totals and have not been translated into measures of local economic impact using input–output (IO) modelling or similar frameworks. Consequently, the estimates do not account for economic leakage, imports, margins, or value-added components, which limits their usefulness for understanding regional GDP or employment effects.

5.2.3 Investment Scale, Employment, and Operational Effects

Another material change introduced in the revised proposal is the expansion to a multi-station network including Fernhill Heights and Bowen Peak. This has several implications that are not explicitly addressed in the updated assessment.

First, the inclusion of multiple stations and additional ropeway segments would likely increase total construction costs relative to the original proposal, potentially increasing short-term construction impacts. Second, more extensive infrastructure may extend delivery timelines and alter the spatial distribution of construction activity. Third, while both the original and revised concepts contemplated year-round recreation, the expanded network and additional stations may increase operational complexity and staffing requirements relative to the earlier configuration.

While the employment assumptions presented appear broadly reasonable at an order-of-magnitude level⁴, potential labour market effects, particularly seasonal workforce pressures in Queenstown’s peak tourism periods, have not been examined.

In summary, the revised transport proposal introduces materially higher theoretical capacity and broader functional integration than the original concept. However, the demand and economic benefit estimates largely replicate earlier assumptions without fully reassessing utilisation, substitution effects, capital scale, or net regional economic contribution. Further analysis would be required to robustly quantify the incremental benefits attributable specifically to the revised transport system.

⁴ Appendix 1A (FTAA Section 22 Requirements), Section 3(iv), refers to “a further 1,250 new jobs associated with activities accessed by the Saddle Funifor, peaking at 250 new jobs during winter months.” This figure appears inconsistent with the employment estimates presented in the economic assessment, which indicate approximately 150 ongoing jobs associated with the Saddle Funifor–related activities. It is therefore considered likely that the 1,250 figure is a typographical error.



6 FTAA Considerations & Conclusion

The assessment of referral under the FTAA is most relevantly considered in relation to Sections 22(1)(a) and 22(2)(a), which address whether a project is likely to deliver significant regional or national benefits and the extent to which those benefits can be substantiated.

The proposal has the potential to generate a range of regional benefits through the combined provision of housing, transport infrastructure, visitor experiences, and ecological restoration initiatives within the Wakatipu Basin. The scale of the residential component, including the inclusion of worker-targeted housing and a community housing allocation, responds to recognised housing supply and labour accommodation constraints in Queenstown. Similarly, the proposed aerial ropeway network represents a substantial infrastructure investment with the potential to support tourism activity and improve access to recreational and environmental assets.

However, a key issue identified throughout this review is that the economic evidence base has not been comprehensively updated to reflect the revised proposal. A number of material changes have occurred since the earlier assessment, including the scale of residential development, the configuration and potential capacity of the transport system, staging assumptions, and the integration of multiple project components. Despite these changes, several benefit estimates continue to rely on earlier assumptions or have not been recalibrated using consistent methodologies.

Specific gaps identified include:

- Limited quantification of capital investment associated with the revised transport infrastructure and residential development components
- Reliance on gross visitor expenditure estimates without assessment of substitution effects within an established tourism market
- Absence of updated input–output or regional economic modelling translating activity into net GDP or employment effects
- Uncertainty regarding staging, delivery timing, and implementation assumptions across a long development horizon
- Limited evidence regarding the magnitude of net additional labour market or productivity effects attributable specifically to the project

These uncertainties mean that, while the project may be capable of delivering significant regional benefits, the magnitude and certainty of those benefits cannot be robustly determined at this stage based on the currently available economic information.

Therefore, we do not believe that the economic benefits able to be delivered by this project have been accurately presented by the applicant. Further economic analysis would be required to confirm the scale, timing, and net regional contribution of the claimed benefits.

Appendix: Reviewers' CVs

Gregory Akehurst

Director

BA/BCom (Geography and Economics)

- Email Address: s 9(2)(a)
- Mobile Number: s 9(2)(a)
- Location: Auckland



Professional Experience

- 2001 – 2025: Director, Market Economics Ltd
- 1996 – 2001: Senior Analyst, McDermott Fairgray Ltd.

Greg is a founding Director of Market Economics and has 30 years' experience consulting to a wide range of sectors in both the New Zealand and Australian markets. His experience covers assessment of market structure, size and change for development clients, economic impact assessment for commercial and government clients, as well as strategic policy, social infrastructure and amenity studies carried out for local councils. He has developed models to assess community needs and assess allocation networks set up to meet those needs. Greg leads 20-30 projects annually and has given expert witness evidence in local government hearings, before the EPA, the Environment Court and provided affidavits as an expert for the High Court.

Greg headed the team investigating the Canterbury Earthquake Rebuilds, labour force, materials and temporary housing requirements for government. In recent years he has led studies into infrastructure projects, Air Quality Impact modelling, as well as sector studies (Marine Industry, Quarrying and the aggregate sector and Construction). These studies draw together all aspects of inputs, to present central and local government with comprehensive assessments on economies' growth and change. Greg has also specialised in assessing Council funding mechanisms – in particular Development Contributions and Financial Contributions for both Councils and the development sector.

Greg authored the Guidebook for Growth Councils that needed to carry out non-residential land capacity and demand assessments to meet their obligations under the National Policy Statement on Urban Development Capacity (NPS-UDC). He was Auckland Council's chief economic witness with respect to Business Land in the Unitary Plan Hearings and led a number of projects around the country investigating business land requirements under the NPS for high growth Councils (Auckland, Future Proof, Queenstown). Greg has also carried out numerous economic studies in support of Fast Track applications under the COVID-19 FT Bill and the Fast Track Approvals Act 2024. Greg is currently the independent expert on the Development Agreements Committee for Waikato District Council.

Relevant Areas of Expertise

Spatial and Economic Analysis and Modelling | Input-Output Modelling | Urban and Regional Economics | Skills and Labour Force Modelling | Economic Growth Modelling | Supply and Demand Analysis | Sectoral and



Specialist Market Analysis | Demand Analysis and Forecasting | Economic Impact Assessment | Policy Analysis and Advice | Infrastructure Funding and Investment | Local Government Funding | Resource Management | Strategic Advice | Peer Review

Greg has successfully completed a range of economic assessments with the following Recent projects showing the breadth of relevant experience.

- Pakiri consent renewals – economic effects assessment (consent assessment, council hearings)
- Brookby Quarry Stage 1. Economic assessment to support Expansion, Environment Court
- Drury Quarry. Economic assessment and Council hearing
- Hunua Quarry Consent application. Economic assessment and Council hearing
- Waingaro Quarry Consent application. Economic assessment
- Kings Quarry FT application – Economic Assessment
- Drury Metropolitan Centre – Economic Impact Assessment and Council Hearing
- Drury Metropolitan Centre – Development Contributions Assessment
- Ryman Healthcare Pukekohe – Development Contributions Assessment, Council Hearing
- Retirement Village Association – DC Assessment nationwide for 20+ Councils
- Wetland Provisions of NES for Freshwater – Economic Assessment of Aggregate loss for regions
- West Coast Coal – Peer review of Economic Assessment
- Waihi North Gold Mine – Peer Review of Economic Impact Assessment for Fast Track
- Martha Mine expansion – Economic peer review assessment
- Industrial Land Demand – Matamata Industrial land demand, private sector client
- NPS-UDC – Guidebook author for Business Land Assessment approach
- NPS – UDC – HBDA for Future Proof, Tauranga, Queenstown Lakes, Dunedin City
- NPS-UD HBDA assessment for Future Proof, oversee others.
- Marine Industry Assessment – Cracker Bay development, Wynyard Quarter
- Selwyn District – PC 73, assessment and critique of HBA prepared for SDC in support of development
- Lincoln Residential Development – Residential Demand modelling, Council evidence
- Ohoka PC 31 – Demand modelling, HBA critique, Council evidence for developer
- Auckland Prison EIA – Fast track economic assessment for Auckland Prison, Department of Corrections
- Dunedin Heritage Protections – Assess economic impacts of adding 146 properties to heritage protection list
- Waimanawa Estate Warkworth – Retail Demand assessment and economic impact assessment incl. council evidence
- Waerenga and Rangiriri Solar FT – Peer review of economic impacts for EPA
- Hamilton City Development Contributions Growth Model
- Peacocke Structure Plan – Economic Review and evidence for HCC
- Development Contributions High Court Affidavit – in support of Hamilton City DC Policy CIV-2020-419-202
- Ravenswood Economic Impact Peer Review – Infinity Holdings, overturned Hearing Panel Verdict.
- Other Fast Track Assessments:
 - Drury Metropolitan Centre
 - Haldon Solar
 - Karori Metlife Care Village
 - Mill Road Stage 1
 - Park City
 - Opunake Solar Farm
 - Summerset Rotorua Village



- Summerset Half Moon Bay
- Tauranga Crossing PC 33 – Demand assessment and centre assessment, Council Evidence
- NZTA Silverdale PPC 103 – Financial Contributions potential, Council evidence
- NZTA Cambridge to Piarere Economic Impact Assessment – Council evidence
- Development Contributions – High Court Affidavit, Developers vs North Shore City Council.



Dr Maggie Hong

Consultant

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Professional Experience

- 2023-present Consultant, Market Economics
- 2021–2023 Principal Analyst, Waikato District Council
- 2018–2021 Business Analyst, AgResearch
- 2014– 2018 Economic Advisor, CERA & Dept of the Prime Minister and Cabinet
- 2006–2014 Economist, New Zealand Manufacturers & Exports Association

Maggie joined Market Economics in late 2023, bringing over 15 years' experience across public and private sectors in New Zealand. She has extensive expertise in economic modelling, policy analysis, and urban and regional economics, with a strong track record in delivering evidence-based advice to senior leaders and elected members.

Most recently, as Principal Analyst in Waikato District Council's Community Growth team, she led projects on NPS-UD monitoring, housing and business development capacity assessments, demographic and land-use analysis, and the development of an in-house Land Capacity Model. She also created interactive Power BI dashboards, refined spatial modelling methodologies using Python, and provided GIS support for regional planning and infrastructure initiatives.

At Market Economics, Maggie works on housing demand and feasible capacity analyses, prepares EOIs for councils and private developers, delivers expert economic evidence for plan change hearings, and peer-reviews economic assessments to support robust decision-making.

She holds a PhD in Economics from the University of Canterbury, with research published in leading peer-reviewed journals such as Applied Economics and the Journal of Economic Surveys. Maggie is proficient in SQL, Power BI, QGIS, Python, and large-scale database management, with specialist skills in econometrics, cost-benefit analysis, geographic information systems, and spatial analysis.

Areas of Expertise

Economic Modelling | Policy Analysis | Urban and Regional Economics | Economic Growth Modelling | Economic Impact Assessment | Cost-Benefit Analysis | Social Impact Analysis | Supply and Demand Forecasting | Demographic Analysis



Maggie has successfully completed a range of economic assessments with the following recent projects showing the breadth of relevant experience.

- Kerikeri Marina – Northland Demand Marina Assessment
- Northwest Rapid Transit Project- Economic Peer Review – Project Benefits report for the Te Ara Hauāuru
- Wooing Tree visitor accommodation in Cromwell – Economic assessment RFI
- Mix-use - Colombo Street Development in Christchurch - Economic assessment peer review
- Home Straight Development in Hamilton Resource Consent - Economic assessment peer review
- Plan Change 14 Hautapu - Economic assessment peer review
- Plan Change 32 Business Land Rezoning - Economic assessment peer review
- Plan Change 33 Area7 Hautapu - Economic assessment peer review
- Plan Change 57 Matamata industrial development – Economic Assessment
- Ryans Road Industrial Development Fast Track Application- Economic Impact assessment
- Ohoka Residential Development Fast Track Application- Economic Impact assessment
- Rotorua Retail Impact assessment - Economic assessment peer review
- Rural rezoning submission analysis – Far North District council District Plan hearing
- Alfriston Urban Zoning - Economic assessment peer review
- Population Spatial Distribution model – Waikato District Council

Memorandum

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Attention: Fiona Blight / Neil Harkin

Company: Queenstown Lakes District Council

Date: 24/02/2026

From: Yvonne Pfluger, Partner, Landscape Planner

Message Ref: Powerhouse Fast Track Application – High Level Landscape Peer Review

Project No: BM210008_076

Executive Summary

1. Boffa Miskell Limited (BML) has been engaged by Queenstown Lakes District Council (QLDC) to provide a high-level peer review of the *Powerhouse Fast-track Application: Preliminary Landscape Assessment Report* (Appendix 07) and *Landscape Visualisations* (Appendix 17) prepared by Patch Landscape (Patch), dated 15 December 2025 (referred to as ‘the Patch Assessment’).
2. To assist with understanding the proposal (due to the high level description provided in the landscape assessment), this peer review has drawn on several of the other technical reports submitted as part of the application, in particular regarding ecology, architecture, the cultural strategy, cadastral plan set, one mile powerhouse reserve sketches, ski area feasibility (section 9.0) and structural design.
3. The proposal includes three connecting gondola/funifor systems with associated base and mid-slope stations; a 52-ha Fernhill Heights residential development with associated earthworks, roading and pedestrian pathways; construction and management of three predator-proof sanctuaries; a ski field and mountain-bike infrastructure with maintenance tracks and new trails; and wilding tree clearance.
4. Some aspects of the project are not yet supported by a level of analysis that gives confidence in the effects ranges stated, in particular for the alpine village and the upper-slope/ ridgeline project components. Given that the proposal is almost entirely located within an ONL, a higher level of certainty regarding the outcomes and potential mitigating factors, including the design and success of mitigation, implementation of the sanctuary and use of low- impact construction techniques would be required to ascertain that the proposal would not have high (significant) landscape effects, a least relating to some of its components. In the QLDC PDP Priority Area Landscape Schedules, this ONL (21.22.12) is identified as having high physical, associative and perceptual values and extremely limited or no capacity for urban expansion, very limited capacity for earthworks other than tracks and trails for recreational use, and limited capacity for passenger lift systems, with a general emphasis on any activities being small scale and low-key.
5. I consider that construction and cumulative effects of the proposal are highly relevant for the assessment of landscape and visual effects, but cannot be assessed based on the information provided. Given the long-term construction timeframes over several decades, I do not consider the construction effects to be temporary. In light of earthworks required for the steep terrain, I anticipate the construction and cumulative visual/ landscape character effects to be high for the village development component for an extended timeframe. Overall, the level of change indicated by multi-kilometre ropeway systems, ridgeline stations, and a 52-ha village on steep ONL slopes indicates potential for effects trending towards significant.

Peer Review Approach

6. The purpose of the peer review is a high-level appraisal of the Landscape Effects Assessment (LEA) undertaken by Patch rather than a parallel assessment and follows the concepts and principles outlined in *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*¹ (the 'Guidelines').
7. The focus of this peer review is to confirm (or not) that the Landscape Assessment undertaken by Patch:
 - follows a sound methodology and method for the purpose,
 - accurately describes, interprets, and evaluates the relevant landscape character and values,
 - analyses the effects on landscape values in a balanced and reasoned way,
 - reaches credible findings supported by reasons, and
 - makes appropriate recommendations with respect to findings².
8. I (Yvonne Pfluger) am a registered landscape architect and have practiced for over 25 years, based in Queenstown for seven years as a partner in BML (see attached CV in Appendix 1). I have assisted several District/ Regional Councils in the South Island with the review of their plans by preparing territorial landscape studies. I specialise in assessments for resort and residential developments through to large-scale infrastructure developments, including airport, port, ski field, renewable energy and roading projects.
9. The process for undertaking this peer review has consisted of a desktop review of the referral application documents. As the author of this peer review, I am very familiar with the landscape context, landscape character and potential public/private viewing audiences in this area. A site visit was undertaken to Fernhill (21/2/2026) and to the mid and upper One Mile Creek catchment and Ben Lomond Saddle (8/2/2026).
10. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. This report has been prepared in compliance with that Code, as if it was expert evidence presented in proceedings before the Environment Court. Unless I state otherwise, this report is within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this report.

Methodology

11. Patch has provided a high-level LEA in response to a specific request for preliminary information to support a fast-track referral application, stating that 'the purpose of the assessment is to provide a preliminary and high-level expert opinion on the likely nature and scale of landscape and visual effects associated with the proposal'.³ The Patch Assessment also notes that the preliminary assessment '...is a condensed version of a more detailed landscape and visual assessment that will be required at the time of the substantive application phase to examine each component of the proposal along a project timeline.'⁴
12. While that scope is acknowledged, I consider it worth identifying the guidance in *Te Tangi a Te Manu* that assessments should be in a form that corresponds with the scale and significance of effects (TTaTM, para 6.10). The Powerhouse Proposal is large in scale and complex, and a comprehensive assessment will be required to support a substantive application in order to fully understand the landscape and visual effects. I note this due to the challenges in quantifying effects ratings for a complex proposal within the constraint of a 'preliminary and high level' format.
13. The Patch Assessment contains a method statement on pages 2-3, which is guided by *Te Tangi a te Manu* and uses the 7-point scale effects rating (very low to very high) which is appropriate.
14. However, although the Patch Assessment states that effects on the biophysical, associative, and perceptual dimensions of the landscape are considered and goes on to correctly identify the ONL status of the area where the project is proposed and references the relevant QLDC PDP Landscape

¹ *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

² The Guidelines, paragraph 6.61.

³ Patch Landscape, 15 December 2025, *Powerhouse Fast-track Application: Preliminary Landscape Assessment Report*, para 1.2, p1

⁴ *Ibid*, para 7.4, p7

Schedule, the Assessment does not provide any further relevant information regarding the statutory planning context. Landscape Schedules were introduced to the PDP following direction from the Environment Court, which found that the ODP lacked sufficient detail on landscape values to ensure the protection of the District's ONLs. The purpose of these schedules is to provide clarity and certainty regarding the specific landscape values that must be protected, maintained, or enhanced within these areas. The schedules also record for each of the priority areas that were assessed what the landscape's capacity is for various activities (such as rural living, tourism, or infrastructure) to determine what level of development an area can accommodate without compromising its character. This is referred to further below in relation to the landscape values of the area and its capacity to absorb change.

Existing Landscape

15. The site forms part of the wider Western Whakatipu Basin Outstanding Natural Landscape (Priority Area 21.22.12), which includes the steep south-eastern slopes of Te Taumata-o-Hakitekura / Ben Lomond and Bowen Peak rising above Queenstown. The Patch Assessment identifies the Site for the purposes of this assessment as the One Mile Catchment – the yellow boundary (labelled as 'receiving landscape') in Attachment B.
16. A high level description of biophysical, associative, and perceptual values of the One Mile Catchment is provided by Patch but these are not explicitly traced to Schedule 21.22.12 of the PDP so it is unclear if the values identified are drawn from the PDP Schedule or are the author's findings and why some information from the PDP has been included and other matters, excluded. For example, I note that perceptual values of the catchment are identified as 'very high' which differs from the PDP ONL schedule in which they are considered 'high'. Also, while the Assessment notes the landscape's visibility, relevant 'particularly important views' (71-84 Schedule 21.22.12) are not referenced).
17. A clear and more fulsome reference to the key values and capacity identified in the relevant Schedule is required so that the Patch Assessment can demonstrate that effects of the project have been considered against them. It would therefore be useful to firstly set out the key landscape values of the wider ONL, followed by the brief, slightly finer-grained Site scale (eg in relation to the Receiving Environment shown in Patch's Attachment B). Ideally this would be further refined to include some analysis of the locations of the key components of the Proposal, i.e., given that a key part of the Proposal is the development of the 52 hectare Fernhill residential and visitor precinct, some baseline information on the landform e.g. contours, elevation, is necessary to understand effects and how the proposal responds to that landscape context and underlying landform.

The Proposal

18. The proposal includes three connecting gondola/funifor systems with associated base and mid-slope stations; a 52-ha Fernhill Heights residential development with associated earthworks, roading and pedestrian pathways; construction and management of three predator-proof sanctuaries; a ski field and mountain-bike infrastructure with maintenance tracks and new trails; and wilding tree clearance.
19. The proposal is described in section 6.0 of the Patch Assessment as a large-scale tourism, residential, and conservation project, and breaks it down to the following components:
 - Powerhouse Precinct Development
 - Powerhouse Gondola and Fernhill Heights Station
 - Fernhill Heights Alpine Village
 - Saddle Funifor
 - Bowen Peak Gondola
 - Predator-free Sanctuaries
 - Ecological Restoration and Wilding Pine Removal
 - One Mile Boardwalk and Trail Network

20. The description provided of each component is very high level and refers to the graphic 'interpretation' provided in Attachment C to assist with an understanding of the proposal as a whole, within a spatial, landscape context. Otherwise, there is limited description of location or scale e.g. I understand the chalets in the proposed village will be '6-level' but this information is not stated in the Patch Assessment. Scale and location are key to understanding potential landscape and visual effects of the proposed buildings and structures.
21. A description of the timing of construction / delivery of the key project components is provided at 6.4, noting that the project is proposed to be staged progressively over 27 years from 2026 through to approximately 2053 and specifically noting the following stages:
- Powerhouse Gondola: 2030-2032
 - Saddle Funifor: 2033
 - Fernhill Heights Alpine Village: three stages 2029-2053
 - Predator Free Sanctuary: 2034-2038
 - One Mile Creek walkway: 2040-2043
22. The Assessment comments that development of the predator free sanctuary is to begin following the completion of the gondolas and commencement of the alpine village and that ecological restoration and reserve improvements will be 'overlapping all stages and continuing in parallel across the full duration of the project.' While the scope of the Patch Assessment is preliminary and high level, if the ecological restoration is considered to form part of the mitigation for the proposal, it would be useful to have greater clarity in regard to the process e.g. timing, location and how that will tie into the rest of the project development as it progresses. Currently, there is a high level of uncertainty regarding the implementation of the benefits of the projects.

Landscape and Visual Effects Assessment

23. The Patch Assessment is divided into two parts: effects on landscape character and visual effects, as broadly expected.

Effects ratings over time

24. A summary of effects is provided in table format in Attachment D. As noted in relation to the project description above, the Patch Assessment states that the project's effects will not occur all at once but will unfold progressively over a multi-decade timeframe and therefore that the 'assessment considers both the immediate and longer-term effects anticipated at each key stage of development.'⁵
25. However, consideration of effects over different time-frames is not obviously provided. The effects ratings that are provided appear to be tied to longer-term outcomes with the table in Attachment D stating that the effects findings assume 'appropriate design integration and mitigation over time'⁶. However, it is not clear if effects have been considered on completion of individual components, or following completion of the project overall, or once vegetation has established – in the vicinity of individual components or across the Site generally. No specific assessment of construction effects is provided.
26. While appreciative of the high level of assessment requested of Patch, given the scale of the project and its 27-year development span details are required around the timeframe on which the effect ratings provided have been based, in order to provide a review of these findings. In my view, the construction, detail design and proposed mitigation of the Fernhill Heights Village is currently ill-defined which prevents an accurate assessment of potential landscape character and visual effects at this point, in the absence of this information. Given the long-term construction timeframes over several decades, I do not consider the construction effects to be temporary. In light of earthworks required for the steep terrain, I anticipate the construction and cumulative visual/ landscape character effects to be high for the village for an extended timeframe. It is not clear if the table in Attachment D of the Patch report provides an assessment of visual effects including any mitigation,

⁵ Ibid, para 7.3, page 7

⁶ Ibid, Attachment D

and if so, how and when this would be implemented. It would therefore, be essential to have some consideration of construction effects which are likely to be higher than the ratings provided in Attachment D, and while they will change, construction activity will be ongoing in some form for many years.

Visual Effects Assessment

27. The Patch Assessment states it has been informed by 'field studies, viewshed tools (Attachment E) and 3D modelling exercises (set out in Attachment C)'.⁷ However, it is unclear how Attachment C, the 'landscape visualisation' has been prepared – for example what methodology was used to provide credibility to the scale and location shown? The scale of modelled existing buildings (which are generally 1- 2 storey in Fernhill) compared to the proposed 6 storey buildings appears unlikely to be correct and potentially misleading (see screenshot below). It is noted that an aerial viewpoint has been chosen rather than a viewpoint that represents the proposal's visibility from a ground-based location representative of more typical viewing opportunities.



Fig 1: Screenshot from Patch visualisations showing existing 1-2 storey buildings in Fernhill compared to proposed 6 storey buildings. These artist impressions appear inaccurate in scale.

28. Similarly, it is unclear what the methodology and accuracy used for the Viewshed analysis (Attachment E) were. What scale, height and location have been used for the three components shown?
29. I agree with the Patch Assessment (para 7.6) that 'Given the scale of the proposal and the number of its components, there will be a wide range of visibility across the receiving environment.' I agree that this will include several parts of Queenstown, such as Queenstown Hill, Fernhill and Sunshine Bay, and Kelvin Heights and Jacks Point, Lake Wakatipu and its shores/ surrounding slopes, but not the wider Wakatipu Basin to the east of Frankton/ Arthurs Point. The representative photographs provided and their locations are considered helpful in the context of a preliminary, high-level assessment, and confirmed my local knowledge of these areas.
30. The Patch Assessment finds that 'Overall, the proposal introduces new linear, vertical infrastructure and urban elements into an exposed mountain setting, where the degree of visibility and contrast depends largely on elevation, topography, and design integration.'⁸ In my view, this description understates or at least simplifies the nature and magnitude of potential change of this large scale proposal in a mountainous ONL setting in the immediate context of Queenstown.
31. The Assessment provides a brief evaluation of visual effects of the key components of the Proposal and therefore, for the purposes of review, the same headings are utilised here. It is noted that a finer grained description of the existing landscape earlier in the Assessment is needed to more clearly inform the nature of effects on existing landscape character and values at these locations.

⁷ Ibid, page 8

⁸ Ibid, para 7.11, page 9

32. The Assessment does not provide a rating from specific views but an overall rating, which is understandable in the context of the high-level nature of the assessment; however it is not clear if the rating provided is considered the highest visual effect that will occur over a range of potential viewpoints, or an 'average'.

Powerhouse Precinct and Gondola

33. The Powerhouse Gondola and precinct development are located close to the lake edge in the vegetated valley of One Mile Creek between Queenstown and Fernhill. Based on my knowledge of the area, this part of the proposal is visually relatively contained and low-lying. While the effects will depend on the design of the precinct, height of the gondola station and the landscape treatment of the surroundings, I consider a finding of low-moderate adverse visual effects as a generic overall finding for this part of the proposal potentially correct. From more distant viewpoints on the lake I agree with the Patch Assessment that these new elements will be seen in the context of the nearby urban fringe of Fernhill / Queenstown; however, when perceived from within One Mile Creek area these urban elements are currently largely out of sight.

Fernhill Heights Alpine Village and Ropeway Station

34. I disagree with the description provided at 7.14 of the Patch Assessment which describes the village and station as occupying 'a mid-slope terrace', 'generally well contained by landform' that 'will appear as a compact, terraced cluster.'
35. The village development is located on steep, southeast facing slopes above, but separated from the existing Fernhill suburb. While no contours have been provided as part of the Assessment, based on my knowledge of the area, the slopes are reasonably steep. The proposal also does not read as being located on a flat or gently sloping surface in any of the images provided in Attachment F to the Assessment. On the contrary they appear to noticeably steepen above the existing Fernhill development.
36. Similarly, the 52 ha development illustrated in Appendix 17 does, in my view, not read as a compact terraced cluster but more as a sprawl of urban development up the slopes to an elevation that is well above⁹ (800masl) the PDP's urban growth boundary along any of the Queenstown suburbs, which is generally located around 500masl. It is understood that the multi-storey chalets will be greater in height than what is permitted within the Suburban Residential Zone below (8m) and have their own specific character, which is likely to read as quite different to the existing character at Fernhill where the presence of multi-storey buildings is currently limited. Without further analysis, it is also not clear exactly how or from whom, the area is well contained.
37. However, I agree with the Patch statement (para 7.15) that the development will create '*built form that contrasts with the predominantly natural patterns of the ONL. The repetition of chalet typologies, combined with the cumulative built mass, will form a clearly legible new element that modifies the natural landform and vegetation patterns currently expressed along these slopes.*' I also consider the roading infrastructure will contribute to this contrast. I consider that significant earthworks/ retaining will be required to implement this proposal on this steep slope, dissected by gullies.
38. Given the decades of staging proposed to complete the project (from 2026 through to approximately 2053) involving vegetation clearance, earthworks and construction, it would be important to understand at what stage or timeframe the Patch effects rating applies. Extended periods of construction over multiple decades will mean that the potentially high effects of vegetation clearance and earthworks would be not be temporary, and information around the implementation of mitigation is crucial in order to assess the full landscape and visual effects during this time. It is also noted that the 'visualisations' portray a greened surrounding on slopes that currently contain mature conifers. I consider it unlikely that the visual effects of developing the village will be no more than moderate over that period of time. While the restoration aspect of the proposal is described as overlapping the staging of the proposal, there is insufficient detail to understand how or when that might begin to 'soften the edges' and contribute to a moderate finding as noted at 7.16 of the Assessment.

⁹ around 800masl – approx equivalent to the top station of the Skyline gondola

Saddle Funifor and Bowen Saddle Station

39. The Saddle Funifor and upper station will be noticeable features on the mid to upper slopes with the station located on the saddle between Ben Lomond and Bowen Peak. The wilding pine removal stated as part of the project will enable greater visibility of the lower part of the funifor until proposed restoration planting becomes established. The uppermost elements such as the two-storey Saddle Station will be above the tree/ alpine scrub line and will remain visible. While the individual funifor elements, such as pylons, are not large in scale, the alignment is 3.4km long and the movement will increase the potential prominence. The construction methodology of the funifor will substantially influence its landscape and visual effects, as vegetation clearance required for access roads along the funifor alignment would require removal of mature native vegetation in the upper One Mile catchment where the alignment crosses from Fernhill to Ben Lomond Saddle.
40. The Patch Assessment finding of moderate-high is potentially accurate if the funifor alignment can be largely built without the requirements for access roads, large scale earthworks and vegetation removal. There is potential for visual effects of the saddle station specifically to be high given its location on the ridgeline depending on final design, size/ height, location, colours etc. This effect would likely be perceived from a wide range of viewpoints around Queenstown, Kelvin Heights and Jacks Point, as well as the lake, given its elevated location. The visual effects from the highly frequented Ben Lomond walking track have not been addressed. Given the openness of the upper One Mile catchment and ridgelines and the potential prominence of the building on the skyline, visual effects would, in my view, be high.

Bowen Peak Gondola, Summit Station and Viewing Platform

41. These proposed structures of the upper gondola are located on the ridgeline up to the summit of Bowen Peak, a sensitive and highly visible location. While I broadly agree with the Patch Assessment that *'Even with subdued materials and sensitive design, these elements will alter the perception of naturalness and skyline coherence, resulting in moderate-high adverse visual effects'*, there is potential for visual effects to be high given its location on the ridgeline and movement of the gondola, depending on final location, design, colours etc. The visual effects of construction roads and earthworks in this open, tussockland were not addressed and have the potential to be high. The highest effects are expected from the nearby Ben Lomond walking track which were not addressed in the Patch report.

Predator-Free Sanctuary and Fencing, Wilding Pine Removal and Native Restoration, Boardwalk and Walking Track

42. Based on the information provided, the Patch Assessment range of ratings from very low to positive is broadly credible. I note that an initial moderate visual effects rating is identified during the wilding conifer removal and appears to be the only reference to an effect related to an 'intermediate' time-period, a pertinent question discussed earlier in this peer review. The predator-proof fencing will require maintenance and a certain amount of clearance and earthworks. In my view, the unnatural line created by the (presumably at least 2m high) fencing will remain perceptible in the open mountain landscape, but would landscape effects would potentially be outweighed by the ecological benefits.
43. Potential visual effects of the new mountain bike tracks and Bowen Peak Mountain Bike Park and Ski area do not appear to have been assessed in the Patch report.
44. Overall, the Patch Assessment identifies and assesses visual effects of the key components but in isolation – not progressively or sequentially as different components are developed, or as a whole project. The assessment does not address cumulative effects from any of the identified viewpoints and does not assess effects from nearby viewpoints along the Ben Lomond walking track which is one of the major tourist attractions in the Queenstown area.
45. The Assessment concludes that *'the project introduces a gradient of visual change, with the upper and mid elevation structures generating the most prominent effects and the lower components being more readily absorbed into their immediate landscape context'* which I consider to be a reasonable observation in general terms. However, I consider that adverse visual effects of the alpine village and more elevated ridgeline structures have the potential to be higher than stated.

Landscape Effects Assessment

46. Landscape effects are assessed by Patch against the biophysical, associative and perceptual dimensions of landscape set out earlier in the report but are not explicitly assessed against the values and capacity identified in Schedule 21.22.12 which is a schedule that contains the specific landscape values that must be protected, maintained, or enhanced within the ONL Priority Areas.
47. Patch identifies moderate–high biophysical effects¹⁰ for the alpine village and upper-mountain infrastructure, noting permanent land-cover shift as a result of the village and localised disturbance (towers, stations, access). The Patch report notes *'the assumption that low-impact construction methods will be employed.'* Based on my experience, construction effects for gondolas have the potential to be higher than the long-term effects, as they often require substantial earthworks for access roads and vegetation removal. While acknowledging the high-level scope, to substantiate these findings, the Assessment would benefit from some explanation of the extent of earthworks, benching, or regrading of slopes that will likely be required for each of these components including the process of improvement that may occur as a result of the ecological enhancements. This is particularly important noting the Ecology report states, *'substantial modification of alpine vegetation could occur'*¹¹ where benching/regrading is needed.
48. As stated in the Patch report in para 7.3 *"It is important to recognise that the project's effects will not occur all at once but will unfold progressively over a multi-decade timeframe. This extended construction and implementation period means that biophysical, associative, and perceptual effects will arise, change, and potentially lessen at different points as various components are completed, revegetation establishes, and sanctuary works mature."* I agree that construction and cumulative effects of the proposal are highly relevant for the assessment of landscape and visual effects, but cannot be assessed based on the information provided. It is noted that the report assumes a best-case scenario in terms of design and success of mitigation, implementation of the sanctuary and use of low-impact construction techniques. Given the information provided at this point this appears to be a highly uncertain outcome, in my view.
49. I tend to consider that given the large scale and high level of disturbance likely to be needed on these sustained steep gradients, primarily in regard to the alpine village and associated roading, and the lengthy timeframe, there is potential for significant biophysical effects over the course of the development span.
50. I agree that in principle, the proposed removal of 400 ha of wilding pines and ecological restoration has the potential for landscape enhancement however further information is required to understand the degree and timeframe over which they may help to manage what are likely to be effects at the higher end of the scale.
51. The Patch Assessment's moderate–high associative and perceptual effects rating acknowledges wāhi tūpuna context¹² and the valued recreation experience and the existing level of coherence and perception of naturalness and remoteness valued in this landscape. This is appropriate in principle, but does not reconcile multi-decade staging and construction visibility which may amplify the sense of urbanisation in a landscape that is considered to have extremely limited or no capacity for this type of development. It also does not test how the combined components might alter associative values compared with considering components in isolation.
52. The experience of an Outstanding Natural Landscape in the immediate context of central Queenstown is, in my view, highly valued by visitor and locals alike. Despite the vicinity of the township, the Ben Lomond reserve currently provides for remote experiences and highly natural views to the surrounding mountain ranges/ Lake Wakatipu that can be easily accessed by a wide range of visitors which would be modified by the introduction of the proposed lift access. I consider that the Western Whakatipu Basin Outstanding Natural Landscape (Priority Area 21.22.12) provides a natural foil to the developed area of Queenstown despite the presence of exotic trees in the lower part of the One Mile catchment which creates a sense of place for the township that is highly valued; this would be substantially modified by the proposal.

¹⁰ I note that 'magnitude of change' is not technically the same as an 'effect' but appears to have been used interchangeably.

¹¹ Independent Ecology Scoping Report, pp-2-3 (Appendix 9)

¹² a Draft Cultural Strategy is included with the application as Appendix 12

Summary

53. Patch has provided a high-level LVA in response to a specific request for preliminary information to support a fast-track referral application for the Powerhouse to Bowen Peak Cable Car and Fernhill Heights Development. Within that constraint, the report largely adopts Te Tangi a te Manu's guidance including a 7-point effects scale, and identifies where design integration and restoration could reduce effects over time.
54. However, some aspects of the project are not yet supported by a level of analysis that gives confidence in the effects ranges stated, in particular for the alpine village and the upper-slope/ridgeline project components. Given that the proposal is almost entirely located within an ONL, a higher level of certainty regarding the outcomes and potential mitigating factors, including the design and success of mitigation, implementation of the sanctuary and use of low- impact construction techniques would be required to ascertain that the proposal would not have high (significant) landscape effects, at least relating to some of its components. In the QLDC PDP Priority Area Landscape Schedules, this ONL (21.22.12) is identified as having high physical, associative and perceptual values and extremely limited or no capacity for urban expansion, very limited capacity for earthworks other than tracks and trails for recreational use, and limited capacity for passenger lift systems, with a general emphasis on any activities being small scale and low-key.
55. I consider that construction and cumulative effects of the proposal are highly relevant for the assessment of landscape and visual effects, but cannot be assessed based on the information provided. Given the information provided at this point for the multi-decade implementation of the proposal with long-term construction effects, there is a high degree of uncertainty regarding the ongoing effects and final outcome, in my view.
56. Overall, the level of change indicated by multi-kilometre ropeway systems, ridgeline stations, and a 52-ha village on steep ONL slopes indicates potential for effects trending towards significant. More detailed information regarding the proposed development, required earthworks/ construction methodologies and mitigation, as well as clear reference to the 21.22 schedule values and capacity statements, is required to substantiate lower assessment findings such as those outlined in the Patch report, including consideration of the overall project.

Appendix 1 CV Yvonne Pfluger



YVONNE PFLUGER

KAIWHAKAMAHERE WHENUA | LANDSCAPE PLANNER, PARTNER
s 9(2)(a) | s 9(2)(a)

TOHU MĀTAURANGA | EDUCATION

Bachelor of Landscape
Architecture and Planning, BOKU
University, Vienna, Austria

Master of Landscape Architecture
and Planning, Vienna, Austria

Master of Natural Resource Mgt. &
Ecological Engineering, Lincoln
University

NGĀ PUKENGA O MUA | EXPERIENCE

20+ Years

TŪHONO MĀTANGA | AFFILIATIONS

Certified Independent RMA
Commissioner

IAP2 Certificate in Public
Participation

Certified Environmental Practitioner
under the EIANZ

Registered member NZILA
Member RMLA

NOHOANGA KA TIKI | SUITABILITY FOR THE ROLE

I specialise in preparing landscape and visual assessments for development projects within sensitive environments, as well as presentation of evidence for Council and Environment Court hearings, mediation and expert conferencing.

I have assisted several District/ Regional Councils in the South Island with the review of their plans by preparing territorial landscape studies. My expertise includes delivery of landscape value assessments, identification of Outstanding Natural Landscapes, advice regarding the development of appropriate management mechanisms and evidence for plan review hearings.

For the recent Queenstown Lakes District Plan Review I prepared evidence for submitters related to the contents of several plan chapters and site-specific re-zoning requests, including Jacks Point residential area and several ski and resort zones.

I am confident in providing expert advice on potentially controversial proposals that require evidence in the environment court or liaison with other experts as part of a mediation process. I have undertaken numerous visual and urban character effects assessments in urban and rural contexts, including presentation of evidence for council and environment court hearings, mediation and expert conferencing.

I regularly provide peer reviews and advice on consent applications to the EPA and various councils, including for MDC, QLDC and CODC where I am a member of the peer review panels. Recently, I was also involved in the preparation of Spatial Plans for these Councils, as well as Blue-Green Network Plans and landscape assessments for the Te Tapuae Southern Corridor Masterplan.

My work has seen me assist developers with assessments for urban residential developments and special housing areas, through to large-scale infrastructure developments, including airport, port, renewable energy and roading projects. I have been involved in the consenting of several golf resort and ski field gondola development proposals, predominantly within the Queenstown Lakes District, over the years. I bring a good understanding of project and client requirements and can provide meaningful input into the design process to minimise potential landscape-related effects of projects.

PUKENGA HANGARAU | TECHNICAL SKILLS

- Landscape Assessment & Planning
- Assessment of Effects on the Environment
- Visual Assessment
- Tourism & Recreation Planning
- Riverscape/ Natural Character Assessment
- Management Plans

TŪMAHI WHEAKO | PROFESSIONAL EXPERIENCE

TIMARU AND EASTERN MACKENZIE DISTRICT LANDSCAPE STUDIES, 2018-2025:

Project manager for review of ONLs, VALs and Coastal Natural Character. Currently Council expert at DPR Hearings.

TE TAPUAE SOUTHERN CORRIDOR, QLDC, 2024 - 2025:

Assessment of landscape/ visual effects of draft Structure Plan for Te Tapuae Southern Corridor Queenstown for QLDC.

THE HILLS RESORT ZONE, ARROWTOWN, 2015-2026:

Landscape planning advice and assessment for resort zone at the Hills golf course through the DPR and subsequent Plan Change.

MILFORD OPPORTUNITIES PROJECT, 2019–2023:

Landscape effects input into the preparation of the masterplan for the Milford Road Corridor, including option analysis for various activity nodes.

TE ANAU BASIN SCENIC RESOURCE AREA AND GROWTH CAPACITY STUDIES, SDC, 2006-2023:

Undertook landscape value assessment and identification of areas that have potential to absorb future development.

QUEENSTOWN LAKES AND TEVIOT SPATIAL PLANS, 2019-2020:

Landscape input into district- wide Spatial Plans and Blue/ Green Network Plans for QLDC and CODC, in collaboration with MHUD.

JACKS POINT DPR, QUEENSTOWN LAKES DISTRICT, 2015-2025:

Landscape assessment of proposed extension to Jacks Point residential/ urban development, incl DPR hearing evidence.

SOUTHLAND LANDSCAPE STUDY, 2018:

Project manager and main author for regional landscape assessment, including characterisation, evaluation and identification of ONLs and VALs.

MT DEWAR DEVELOPMENT AND REFORESTATION PROJECT, TREESPACE, 2018:

Preparation of effects assessment for large-scale reforestation and residential development project near Arthurs Point, incl design input.

PORTERS SKIFIELD DEVELOPMENT, PSA CAPITAL, 2010/2018:

Prepared landscape assessment report for proposed skifield extension, visitor accommodation and proposed mountain bike park within the area.

SUNNYHEIGHTS SPECIAL HOUSING AREA, OREWA, 2016:

Landscape and visual effects assessment to accompany the SHA application in collaboration with Boffa Miskell urban designers/ ecologists.

QUEENSTOWN AIRPORT RUNWAY EXTENSION SAFETY AREA, QUEENSTOWN AIRPORT, 2007-2008:

Prepared an assessment of landscape effects and environment court evidence for a major earthworks project.

GONDOLA DEVELOPMENT, TREBLE CONE SKIFIELD, 2006:

Prepared an assessment of landscape effects and evidence for a QLDC hearing.

MAHINGA O MUA | BACKGROUND

2005 to present

Landscape Planner, Boffa Miskell Ltd, Christchurch/Queenstown

2004 - 2005

Self-employed, Environmental and Recreation Consultancy Services,

2001 - 2004

Landscape Planner, Revital Econsult, Lienz, Austria

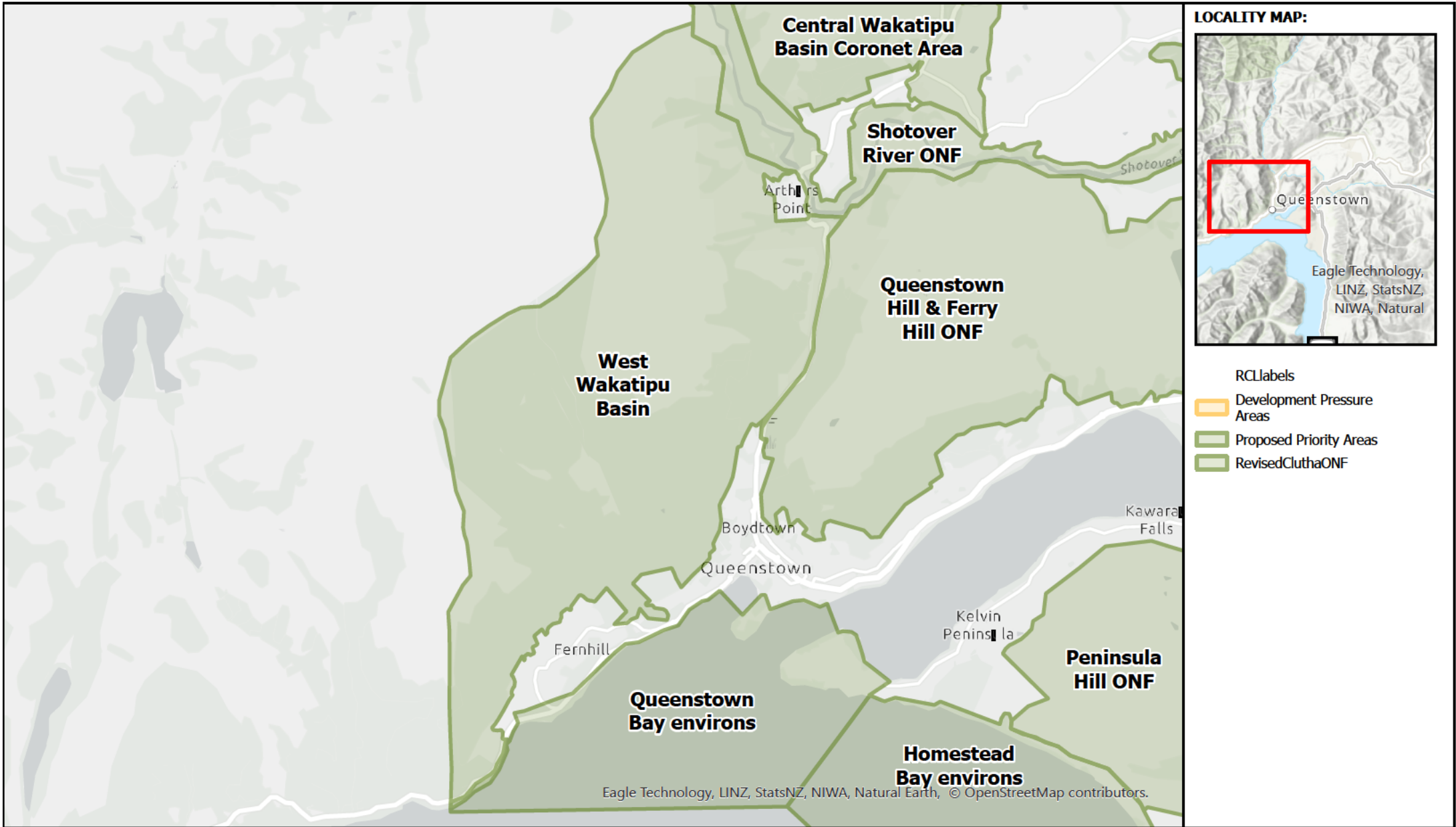
2003

Research (voluntary), Department of Conservation, Christchurch, NZ

1999

Internship; Prof, Schmidt Landscape Architects, Munich, Germany

Priority Areas



The information provided on this map is intended to be general information only. While considerable effort has been made to ensure that the information provided on this map is accurate, current and otherwise adequate in all respects, Queenstown Lakes District Council does not accept any responsibility for content and shall not be responsible for, and excludes all liability, with relation to any claims whatsoever arising from the use of this map and data held within.



Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



26 FEB 2026

JMITC-35

Hon Chris Bishop
Minister for Infrastructure

By email: infrastructure.Portfolio@parliament.govt.nz

Dear Chris

Thank you for your invitation to comment on the referral application for Powerhouse Ropeway [FTAA-2511-1126] under the Fast-track Approvals Act 2024. You have invited me to comment in my capacity as Associate Minister of Transport.

While this project was initially declined for panel consideration, I am pleased to note that the applicant has taken significant steps to improve the application. Given this, I support the Powerhouse Ropeway application being referred to the Fast-track process.

I consider the project will provide significant regional benefits, including by supplying needed housing stock in one of the fastest growing regions of New Zealand. This project will provide over 1,300 residential dwellings with half of the units being dedicated for key worker accommodation. It will also provide greater access to world-class tourism offerings which aligns with the government's tourism roadmap. The project will also see the establishment of multiple predator-free sanctuaries for native bird breeding habitats supporting species such as kiwi, takahē and kākāpō.

Projects like the Powerhouse Ropeway are exactly what Queenstown and Central Otago needs to support their rapid growth and capitalising on the South Island's world class tourism offerings.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'James Meager', written over a large, stylized blue scribble.

Hon James Meager
Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



05 MAR 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0027430

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act (FTAA) on the following applications:

Out of Scope

- Powerhouse, FTAA-2511-1126

Out of Scope

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

Powerhouse Project, FTAA-2511-1126

The project is an integrated development. It proposes the construction and establishment of a three-stage aerial ropeway network and associated station infrastructure, connecting a retail, hospitality and conferencing precinct (Powerhouse Precinct and Powerhouse International Convention Centre). The proposal also includes a higher residential suburb (Fernhill Heights), along with sightseeing, recreation and conservation activities up the Te-Taumata-o-Hakitekura (Ben Lomond) Saddle and Bowen Peak.

The project involves:

- a. three contiguous aerial ropeways, including the Powerhouse Gondola, the Saddle Funifor and the Bowen Peak Gondola
- b. station buildings, aerial ropeway infrastructure and ancillary development, for Powerhouse Station (including a retail precinct), Fernhill Heights Station, Saddle Station and Bowen Peak Station
- c. a new residential development known as Fernhill Heights on a 52-hectare site, including the construction of 175 alpine-style chalets, providing a total of 1,333 residential units; provision of five per cent of units as affordable housing and fifty per cent for worker accommodation; and fee simple and unit title subdivision across the residential units
- d. new fenced predator-free sanctuaries and the removal of wilding pines and the planting of native vegetation
- e. new tourism activities, including a ski field on Bowen Peak and a mountain bike park and trail walking tracks.


The economic assessment provided by the applicant does not specify the total contribution to GDP from development activity of this proposal but considers the longer term ongoing economic activity that this infrastructure will support. The application provides an estimate of expected ongoing economic activity of:

- a. up to 175 jobs are projected to be associated with the Powerhouse Precinct and Powerhouse International Convention Centre, and a further 150 jobs on average associated with activities accessed by the Saddle funicular
- b. up to \$127 million annually of new visitor spending on retail and hospitality directly within the Powerhouse Precinct and by delegates across their Queenstown stay
- c. a further from \$120 million a year on activities accessed by the Saddle funicular (including sightseeing, nature experiences, biking and skiing activities).

While an estimate of the short-term construction cost of this project is not provided, a development of this scale will have a substantial input into the regional economy in the short-term. And if successful, this project could have significant ongoing contribution to the tourism industry and to visitor spend in the local economy.

The primary long-term benefit of this proposal is its provision of a new transportation network, additional housing and long-term infrastructure contribution to tourism activities.

Out of Scope



Out of Scope



Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', written in a cursive style.

Hon Nicola Willis
Minister for Economic Growth

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Powerhouse (FTAA-2511-1126)
---------------------	-----------------------------

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
*Portfolio	Tourism and Hospitality		
*First name	David		
*Last name	Fraser		
Contact person (if different from above)			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>We have been asked to provide comments on behalf of the Minister of Tourism and Hospitality on Powerhouse's application to use the fast-track process. We have therefore commented only from a Tourism and Hospitality portfolio perspective.</p> <p>This project, if fully realised, may boost regional tourism activity, such as access to viewing platforms and predator free sanctuaries. The development of the Fernhill Heights subdivision would increase the supply of accommodation in Queenstown, which could benefit visitors and the local tourism and hospitality workforce.</p> <p>We have previously noted that many of tourism-related fast-track applications we have been asked to comment on are concentrated in the Queenstown Lakes District. Given this concentration, these applications will not address the dispersal of tourists across the regions.</p>

Minister's signoff

Insert Fast-track logo

Hon Louise Upston

Date

Minister for Tourism and Hospitality

Office of Hon Simon Watts

Minister of Climate Change
Minister for Energy
Minister of Local Government
Minister of Revenue



Hon. Chris Bishop
Minister for Infrastructure
c.bishop@parliament.govt.nz

Dear Chris

Thank you for the invitation to provide comments on the application for referral of the Powerhouse (FTAA-2511-1126) project to an expert panel (the Panel) under section 17 of the Fast-track Approvals Act 2024 (FTAA).

Having reviewed the referral application, I note the potential alignment with the Government's Climate Strategy mitigation and adaptation objectives, particularly through electric transport infrastructure and ecological mitigation. I would like to highlight my support for the proposal's adaptation benefits through the removal of wilding pines and the establishment of large predator-free sanctuaries across Bowen Peak and Fernhill. Alongside supporting the restoration of biodiversity, the wilding pine removal programme may also reduce future fire risk in a warming climate.

The project may also present an opportunity as a low-emissions alternative to private vehicle use for residents, workers and visitors travelling into the alpine area, with potential to reduce vehicle kilometres travelled. While further detail on this is expected at the substantive stage, I support the potential benefits of referring the Powerhouse project subject to further information.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'S. Watts', with a long horizontal line extending to the right.

Hon Simon Watts
Minister of Climate Change

Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy



2 March 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act 2024 – Powerhouse referral application (FTAA-2511-1126)

Dear Chris,

Thank you for the opportunity to comment on this referral application under the Fast-track Approvals Act 2024 (FTAA 2024).

The FTAA 2024 has been established to provide a regime that makes it easier and quicker for regionally and nationally significant infrastructure projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the application and its alignment with the priorities of my Regional Development portfolio. My comments are attached as Annex One.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Shane Jones'.

Hon Shane Jones
Minister for Regional Development

Annex One – Regional Development comments

Project overview

1. The applicant, Bowen Peak Limited, is seeking referral under the Fast-track Approvals process to progress the Powerhouse development. This proposed project is an integrated development in the One Mile Powerhouse reserve area of Queenstown, Otago, which would include an aerial ropeway network (including two gondolas) and infrastructure, residential development, predator free sanctuaries, tourism activities, and a retail/hospitality precinct.
2. According to the economic assessment provided by the applicant, the expected regional benefits include:
 - a. creation of 325 long-term jobs associated with the ongoing activities of the resulting development
 - b. up to \$127 million of annual new visitor spending in retail and hospitality, and \$120 million of annual new spending on activities becoming newly accessible as a result of the development (sightseeing, nature experiences, biking, skiing).
3. The Aerial Ropeway Network proposed as part of the Powerhouse development is expected to provide a new public transport option for residents and visitors, with the capacity to carry 100 per cent of Fernhill Heights residents in a one hour time period across morning peaks.
4. The development is also expected to create new residential capacity for 1,333 housing units, equivalent to housing at least 2,794 people.
5. The applicant did not provide any evidence of the immediate local impact from the proposed 10-year construction programme.

Regional Development comments

6. Based on the analysis provided, the Powerhouse development would offer significant ongoing regional economic benefit. However, the assessment is high-level and potentially does not fully capture total regional benefit.
7. To further inform your decision, you may wish to request the applicant provide information on the economic impact from the proposed 10-year construction programme.

FW: CORPG4310 / Invitation to comment on Fast-track referral application for the Powerhouse project under the Fast-track Approvals Act 2024 – FTAA-2511-1126

From Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>

Date Mon 9/02/2026 3:56 PM

To FTAreferalls <FTAreferalls@mfe.govt.nz>

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>

Sent: Monday, 9 February 2026 3:45 PM

To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>

Subject: RE: CORPG4310 / Invitation to comment on Fast-track referral application for the Powerhouse project under the Fast-track Approvals Act 2024 – FTAA-2511-1126

Good afternoon,

Thank you for your email. Confirming Hon Paul Goldsmith, Minister for Art, Culture and Heritage has no comment.

Kind Regards,



Office of Hon Paul Goldsmith

Minister for Arts Culture and Heritage | Minister of Justice

Minister for Treaty of Waitangi Negotiations | Minister for Media and Communications

Website: [<http://www.beehive.govt.nz/>]www.beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>

Sent: Thursday, 29 January 2026 12:15 pm

To: Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Louise Upston (MIN) <L.Upston@ministers.govt.nz>; James Meager (MIN) <L.Meager@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Chris Penk (MIN) <C.Penk@ministers.govt.nz>; Simon Watts (MIN) <S.Watts@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>

Cc: FTAreferalls <ftareferalls@mfe.govt.nz>

Subject: CORPG4310 / Invitation to comment on Fast-track referral application for the Powerhouse project under the Fast-track Approvals Act 2024 – FTAA-2511-1126

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Minister for Arts, Culture and Heritage
- Minister for Tourism and Hospitality
- Minister of Conservation
- Minister of Climate Change
- Minister for Land Information
- Associate Minister of Transport
- Associate Minister of Housing

Hon Chris Penk

Minister for Building and Construction
Minister for Land Information
Minister for Small Business and Manufacturing
Minister for Veterans
Associate Minister of Defence
Associate Minister for Emergency Management and Recovery
Associate Minister of Immigration



Hon Chris Bishop
Minister for Infrastructure
Private Bag 18041
Parliament Buildings
Wellington 6160

By email: infrastructure.portfolio@parliament.govt.nz

Ref: GQ 26-098

Dear Hon Chris Bishop

Thank you for your email, received on Thursday 29 January 2026, regarding an invitation to comment on a Fast-track referral application for the Powerhouse project under the Fast-track Approvals Act 2024.

As noted in the application, the proposed Powerhouse project site in Queenstown will be partially on or adjacent to areas of land administered by the Department of Conservation. There is also Crown pastoral leasehold land and Crown land either on or near part of the proposed project site.

The Crown Pastoral Land Act 1998 and the Land Act 1948 govern applications for works on Crown pastoral leasehold land and Crown land, respectively. The approvals under these Acts sit outside of the fast-track process, and so any works or installation of assets on Crown pastoral leasehold land or Crown land will require a separate application to the Commissioner of Crown Lands in Land Information New Zealand.

Thank you for taking the time to write.

Sincerely

A handwritten signature in blue ink, appearing to be 'C. Penk', written over a light blue circular stamp.

Hon Chris Penk
Minister for Land Information

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



27 FEB 2026

Hon. Chris Bishop
Minister for Infrastructure
c.bishop@ministers.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

Tēnā koe Hon. Bishop

Thank you for the invitation to comment on the fast-track consent application for the Powerhouse project, proposed by Bowen Peak Limited, in Queenstown.

The project is an integrated development that proposes an aerial ropeway network, associated infrastructure, a residential development (Fernhill Heights) including 175 alpine-style chalets totalling 1,333 residential units, predator-free sanctuaries, and a range of tourism activities. These include a ski field on Bowen Peak, a mountain bike park and trail network, walking tracks, and a retail and hospitality precinct.

Queenstown Lakes is one of the most expensive places in New Zealand to buy or rent a home. While the district has a high rate of new residential building, strong population growth and tourism demand continue to place pressure on the housing market. Working households in particular face challenges securing long-term, affordable rental accommodation. This proposal would support increased supply of market housing, helping to address these pressures.

The applicant also has stated that five percent of the total units would be provided for affordable housing through Queenstown Lakes Community Housing Trust, and that fifty percent of the total units would be reserved for worker accommodation. The Trust has a strong track record of partnering with developers, the council and central government. While there is no guarantee of future funding support, access to sections in a central location would support the Trust's wider housing aspirations.

The Queenstown Lakes Spatial Plan promotes a consolidated and mixed-use approach to growth, with an emphasis on intensification within existing urban areas and higher-density housing typologies. The project site is currently zoned rural and is not identified as a future urban area. While the residential component is not located within a priority development area, parts of Fernhill nearby are zoned for medium- and high-density residential use.

There is very limited greenfield capacity in central Queenstown. While future housing growth is primarily expected to be delivered through intensification, the proposal would contribute a significant number of homes in a high-amenity location. Fernhill is connected to Queenstown, Frankton and Queenstown Airport by a high-frequency bus route, which also serves the proposed funicular station.

This development would increase the supply of homes, including affordable and worker accommodation, in an area facing significant housing pressure. Any relevant planning,

infrastructure and other considerations can be considered at the next stage should the project proceed. Accordingly, I have no objection, from the perspective of the Housing Portfolio, to this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in blue ink that reads "Tama Potaka". The signature is written in a cursive style with a large, sweeping flourish at the end.

Hon Tama Potaka
Associate Minister of Housing

From: [Infrastructure Portfolio](#)
To: [Shane Jones \(MIN\)](#); [Nicola Willis \(MIN\)](#); [Penny Simmonds \(MIN\)](#); [Louise Upston \(MIN\)](#); [James Meager \(MIN\)](#); [Tama Potaka \(MIN\)](#); [Chris Penk \(MIN\)](#); [Simon Watts \(MIN\)](#); [Paul Goldsmith \(MIN\)](#)
Cc: [FTAreferrals](#)
Subject: CORTP-6720 Invitation to comment on Fast-track referral application for the Powerhouse project under the Fast-track Approvals Act 2024
Date: Thursday, 29 January 2026 12:15:00 pm
Attachments: [Comments Form for Invited Ministers.docx](#)
[image001.jpg](#)

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Minister for Arts, Culture and Heritage
- Minister for Tourism and Hospitality
- Minister of Conservation
- Minister of Climate Change
- Minister for Land Information
- Associate Minister of Transport
- Associate Minister of Housing

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Bowen Peak Limited for referral of the Powerhouse project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2511-1126).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email, being 27 February 2026. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for

written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Powerhouse
Applicant	Bowen Peak Limited
Location	Queenstown, Otago
Project description	<p>The project as an integrated development, proposing to construct and establish a three-stage aerial ropeway network, associated station infrastructure, a residential development, predator free sanctuaries, and tourism activities including a ski field on Bowen Peak, mountain bike park, walking trails, and a retail and hospitality precinct.</p> <p>The project involves:</p> <p>a. three contiguous aerial ropeways, including:</p> <ul style="list-style-type: none">i. the Powerhouse Gondola (a capacity of 10 passengers per cabin) to connect the One Mile Powerhouse Reserve to the Saddle Funifor, which provides access to the proposed Fernhill Heights residential development and the proposed predator-free sanctuaryii. the Saddle Funifor (a capacity of 110 passengers per cabin) to connect to the Fernhill Heights residential development and facilitate access to the proposed tourism activitiesiii. the Bowen Peak Gondola (a capacity of 10 passengers per cabin) to connect Saddle Station to a viewing platform on Bowen Peak and provide access to a new mountain bike park and ski areaiv. note: the applicant states the final system types (pylon-based cable car, gondola, or funifor) will be confirmed with any substantive application <p>b. station buildings, aerial ropeway infrastructure, and ancillary development, including:</p> <ul style="list-style-type: none">i. Powerhouse Station, being a retail, hospitality, and tourism precinctii. Fernhill Heights Station, being an integrated retail, hospitality and tourism facility with bus turnaround bay and multi-level carparkiii. Saddle Station, being a two-storey facility with bar/restaurant, retail, guest services, outdoor education rooms, public shelter, and public toiletsiv. Bowen Peak Station, being a public viewing platform with shelter and toilets, to provide access to the proposed tourism activities <p>c. a new residential development known as Fernhill Heights on a 52-hectare site, including:</p>

- i. the construction of 175 alpine-style chalets – each chalet will contain either seven or nine residential apartment units, providing a total of 1,333 residential units with a mix of two-, three-, or four-bedroom apartments
 - ii. provision of five per cent of units as affordable housing and fifty per cent for worker accommodation
 - iii. fee simple and unit title subdivision across the residential units
- d. new fenced predator-free sanctuaries, including:
- i. the establishment of the Te Taumata o Hakitekura Predator-free Sanctuary (approximately 290 hectares) located in the upper One Mile and Two Mile Creek catchments
 - ii. the establishment of two sanctuaries within the lower One Mile Reserve (approximately 3 hectares)
 - iii. the removal of wilding pines and the planting of native vegetation
- e. other new tourism activities, including:
- i. a ski field on Bowen Peak
 - ii. a mountain bike park and trail
 - iii. walking tracks.

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3

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Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Powerhouse
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details		
Please ensure that you have authority to comment on the application on behalf of those named on this form.		
Organisation name	Department of Conservation	
*First name	Emily	
*Last name	Bayliss	
Postal address		
*Contact phone number	s 9(2)(a)	Alternative
*Email	Fast-track@doc.govt.nz ; s 9(2)(a)	

2. Please provide your comments on this application
Comments follow overleaf.

Manager's signoff



Jenni Fitzgerald

27 February 2026

Director-General of Conservation s17 comments

Project name	Powerhouse
Applicant name	Bowen Peak Ltd
Application number	FTAA-2511-1126
Project summary details	<p>The proposal is an integrated development and infrastructure package comprising:</p> <ul style="list-style-type: none"> • A series of aerial ropeways connecting One Mile Powerhouse Reserve in Ben Lomond Commonage Reserve to Bowen Peak, via Fernhill Heights and Ben Lomond Saddle; • Four corresponding station buildings and ancillary activities including a bunkhouse at Saddle Station; • Fernhill Heights Alpine Village: 175 chalets across 52 ha, providing 1,333 housing units; • Predator-Free Sanctuaries: a small lower sanctuary (3 ha) and a large upper sanctuary (290 ha); • Fibreglass boardwalk and extension to One Mile Creek Walkway; • Bowen Peak Ski and Mountain Bike Area and walking trails; • Wilding pine clearance and ecological restoration involving approx 400 ha of wilding conifer removal with native replanting. <p>In relation to approvals where DOC is an administering agency, the applicant has identified the following approvals will be required:</p> <ul style="list-style-type: none"> • Wildlife approvals • Approvals under Part 3B of the Conservation Act 1987 for leases, licences and easements • Approvals under the Reserves Act 1977 <p>DOC was unable to identify specific detail in the application documents which sets out:</p> <ul style="list-style-type: none"> • which species the wildlife approvals relate to, based on the ecological assessment DOC's view is that the approvals will likely be for activities relating to lizards, avifauna and possibly bats¹. • whether Freshwater Fisheries approvals have been considered in relation to the application. DOC's view is

¹ This is based on the information provided in a high-level ecological assessment (Appendix 9) only.

	<p>that they may be required to undertake the project but further information is needed to inform this².</p> <ul style="list-style-type: none"> • the relevant PCL affected under the Conservation Act or Reserves Act, the following reserves are administered by DOC and are anticipated to be involved: <ul style="list-style-type: none"> • Ben Lomond Scenic Reserve • Sargood Chalet Girl Guide Camp <p>Notwithstanding the above (and not specified in the application), approvals related to the following land administered under the Reserves Act 1977 and vested in QLDC are anticipated to be involved:</p> <ul style="list-style-type: none"> • Ben Lomond Commonage (Recreation) Reserve³ • Queenstown Water Supply (Local Purpose) Reserve
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1 General comment

- 1.1 The project includes approvals under specified Acts for which DOC is the administering agency, as such the applicant was required to undertake pre-lodgement consultation in accordance with s 11(e) of the Fast-track Approvals Act 2024 (FTAA).
- 1.2 DOC is satisfied that the Applicant has engaged with DOC on relevant aspects of the application. DOC and the Applicant undertook a pre-lodgement meeting on 14 November 2025 to discuss additional information provided in relation to the application and the Applicant has had ongoing dialogue with the DOC Fast Track team and local Queenstown DOC office in relation to various elements of the project.

2 Minister’s decision on referral application

- 2.1 FTAA ss 21 and 22 set out matters to be considered in determining whether a referral application should be accepted. DOC notes that other agencies are better placed to comment on some matters, (such as competing applications on QLDC vested reserves) as detailed in the table below including those in s22. The comments provided by DOC are targeted to sections where DOC has specific interests or commentary on conservation related information relevant to the Minister’s decision.
- 2.2 For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should consider as per the tables below.
- 2.3 Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	The meaning of ineligible activity is set out in s 5 of the FTAA – DOC has considered ss5(1)(f), (h), (i), (j) and (k) and based on the information reviewed has

² It is also acknowledged the applicant may seek other approvals outside of the Fast-track application process.

³ Includes One Mile Powerhouse Reserve, inter alia;

Section	Criteria	Comments
		not directly identified any aspect of the project that would meet the definition.
21(3)(c)	Is there adequate information to inform a decision	<p>DOC considers there is adequate information to inform a referral decision in relation to the wildlife aspects of the application, however, further information and clarification would need to be provided should the project be referred. It is noted that additional wildlife approvals may be required for the proposed Predator-Free Sanctuaries.</p> <p>DOC has provided specific commentary in relation the request for additional information pursuant to s 20(1) below. DOC's current position in relation to the proposed concessions, being draft Licences to Occupy, is that they are not appropriate in all instances, given the nature of the proposed works and the ongoing operation of the cablecar network, and its inherent health and safety, and Crown liability risks. It is likely that a combination of leases, licences and easements will be required.</p> <p>DOC encourages pre-lodgement consultation with DOC in relation to this matter, should this application be referred.</p> <p>Additionally, QLDC may have further commentary in relation to the reserves vested to them.</p>
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.
21(5)(a)	<p>Is the project inconsistent with:</p> <ul style="list-style-type: none"> • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011 	<p>Although not inconsistent with the Ngaī Tahu Claim Settlement Act (NTCSA), DOC observes that the provisions of Appendix 14 'Proposed Licences to Occupy Agreements' and any other concessions sought will need to give effect to the Right of First Refusal (RFR) principles afforded by the NTCSA, such that the total duration of any concession (including construction and removal of infrastructure) cannot exceed 50 years without triggering RFR. DOC has provided additional commentary about concessions in response to the s 20 request, below.</p> <p>There may be additional considerations relevant to the project under the NTSCA.</p> <p>DOC has not identified any other inconsistency with any relevant settlement or other obligation, subject to any comments from Treaty partners under s 17(1)(d).</p>

Section	Criteria	Comments
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the conservation related approvals referenced should not be considered under the FTAA process.
21(5)(c)	Would the project have significant adverse effects on the environment	<p>In relation to the wildlife approval(s) sought, DOC considers adverse effects may be managed through conditions and management plans. However, the limited information provided at referral means that the scale of effects is currently unknown.</p> <p>In relation to the broader proposal, there will be a range of environmental effects which have not been addressed in the referral application and will need to be considered in further detail if the project is referred. Based on the information available in the referral application, in terms of effects on conservation values, DOC has identified the below focuses:</p> <ul style="list-style-type: none"> • Potential wildlife approvals required for wilding pine removal and wilding pine reinfestation consideration of effects and mitigation strategies; • Subalpine areas of Ben Lomond Scenic Reserve and proposed predator-free sanctuaries as habitat for indigenous birds, lizards and invertebrates, and At Risk or Threatened plant species. The scale of these effects is currently unknown given the high-level nature of the referral application; • Effects upon recreation and tourism including landscape amenity effects, health and safety considerations related to the conflict between cablecar operations and existing recreational activities; • Potential conflict with known archaeological sites, specifically; <ul style="list-style-type: none"> • Fernhill–Saddle cableway (Towers 1 & 2): may encroach on E41/204 (dwelling) within the Ben Lomond Scenic Reserve. • Local Purpose Reserve (ex Sargood Chalet / Girl Guide Camp): contains E41/228 (mining tailings and races). • Historic route (unrecorded in ArchSite). A pre 1900 route from Queenstown through the Ben Lomond / Bowen Peak

Section	Criteria	Comments
		<p>saddle likely followed the unformed legal road boundary that bisects Sec 4 Blk VII, Ben Lomond Scenic Reserve. This coincides with the eastern parts of the Predator-free Sanctuary fence.</p> <p>As a portion of the affected land is on PCL administered by QLDC, they may have further views on potential significant environmental effects.</p>
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history in relation to conservation Acts.
21(5)(g)	Would a substantive application have any competing applications	DOC has not identified any competing applications.

2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	The consideration of this application under the fast-track process offers considerable efficiencies in terms of the consideration of the concessions for multiple parcels of land, and wildlife approval elements of the proposal within one application.
22(2)(a)(ix)	Will this project address significant environmental issues?	This project will not address a significant environmental issue.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	<p>2.3.1.1 Relevant local or regional documents include the Otago Conservation Management Strategy 2016 (CMS). The application would likely be considered inconsistent with the relevant statutory planning provisions unless the following matters are adequately addressed:</p> <p>a. In relation to the proposed utilities and structures including the aerial ropeway stations and associated infrastructure, consideration needs to be given to the:</p> <ul style="list-style-type: none"> • relevant policy criteria in the Conservation General Policy 2005 and the Otago

Section	Criteria	Comments
		<p>Conservation Management Strategy (CMS); and</p> <ul style="list-style-type: none"> • applicable Place outcome statements in the CMS, including the requirement that prominent mountain and ridgeline landscapes remain in their natural state or unmodified beyond their condition at the time the land became public conservation land. <p>b. In relation to the proposed development of a new ski field, consideration needs to be given to the CMS policy direction that:</p> <ul style="list-style-type: none"> • further development of existing authorised ski fields is in preference to approving new ski field developments; and • development of new and existing authorised ski fields should apply a precautionary approach to the approval of new structures, accommodation facilities and terrain modification and consider both the likely effects of water use (for snow making), 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. <p>The wildlife approvals sought as part of this application do not appear inconsistent with that strategy.</p>
22(b)	Any other matters the Minister may consider as relevant?	None identified. Given the high level of effects assessment supplied at referral stage, DOC encourages the applicants' engagement with DOC, QLDC and Iwi in relation to concessions and wildlife approvals as applicable, as well as details for the proposed predator free sanctuaries prior to the lodgement of any substantive application.

3 Other considerations

- 3.1.1 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. As per other sections of this report, DOC has identified other approvals that may be needed to complete the project which have not been specified in the referral application. The application and effects are challenging to understand due to how information relating to PCL is presented.

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- 3.1.2 It is noted that the project footprint spans several continuous PCL parcels (held in either QLDC or DOC ownership) which collectively form what is referred to locally as *Te-Taumata-o-Hakitekura Ben Lomond Reserve*. However, *Te-Taumata-o-Hakitekura Ben Lomond Reserve* is not identified on DOC, QLDC or LINZ GIS mapping. One Mile Reserve and Powerhouse Reserve, as they are informally known as, appear to be located within Ben Lomond Commonage (Recreation) Reserve, and partly within the wider *Te-Taumata-o-Hakitekura Ben Lomond Reserve* footprint. Again, neither One Mile Reserve or Powerhouse Reserve are identified on DOC or QLDC GIS mapping, although 'Ben Lomond Forest – One Mile Powerhouse' is identified on LINZ within the Ben Lomond Commonage Recreation Reserve parcel.
- 3.1.3 For clarification and to avoid confusion (around where specific activities are proposed), it is recommended that the applicant adopts a naming convention when referring to these parcels which reflects the underlying Reserves as identified in NaPALIS, being;
- Ben Lomond Scenic Reserve
 - Sargood Chalet Girl Guide Camp
 - Ben Lomond Commonage (Recreation) Reserve
 - Queenstown Water Supply (Local Purpose) Reserve

4 Section 20 Request for further information

- 4.1.1 The Minister has invited DOC to provide additional information pursuant to s 20(1) of the Act as an administering agency, specifically;

The applicant proposes that the occupation of reserve land would be authorised through a sequence of short-term licences to occupy, totalling 25 years (five years for construction, followed by two 10-year operational licences).

The draft licences are included in Appendix 14 of the application. The applicant considers this would not trigger the 50-year threshold relevant to the right of first refusal within the Ngāi Tahu Treaty settlement provisions. Having regard to the above, the Minister seeks further information from you on whether the proposed license structure is appropriate for the project.

- 4.1.2 DOC has undertaken a preliminary review of the draft Proposed Licences to Occupy Agreements submitted by the applicant at Appendix 14, where the parties involved are the Minister of Conservation and Bowen Peak Ltd. DOC's position is that the exclusive reliance upon licences to occupy PCL is inappropriate; and that several clauses of Appendix 14 are problematic or are likely to fall afoul of the Ngāi Tahu Claim Settlement Act (NTCSA) without explicit modifications that limit the extent of term extensions that can be considered without triggering the NTCSA Right of First Refusal (RFR) provisions.

Reliance upon licences per se

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- 4.1.3 The proposal to construct, operate and maintain infrastructure on PCL, for an activity that carries inherent health and safety risk as well as liability risk to the Crown, necessitates exclusive use of the land the stations and infrastructure are located upon. DOC's view is that a licence is not an appropriate vehicle to facilitate heavy infrastructure as it does not enable exclusive possession and it exposes the Crown to liability risk. DOC's position is that it is likely that a combination of leases, licences and easements will be required to facilitate this development; a lease for station buildings, concrete footings for pylons etc which will need to preclude access to the public, other concessionaires and the Crown; a licence for other structures such as pedestrian walkways and the wider curtilage for maintenance works access, (inter alia); and easements for the aerial ropeways across Public Conservation Land as well as rights of way for land based vehicle access.

Reliance upon licences as drafted in Appendix 14

- 4.1.4 It is noted that the draft licences contained in Appendix 14 relate to the construction phase of the project, which if completed in a manner satisfactory to the Licensor, provide for licences to operate for a period of 10 years, with opportunity for extensions thereafter. DOC's view is that it is not appropriate for a licence or any concession to be issued just for the construction phase. This approach does not allow the Applicant to understand the concession term and any ongoing conditions and fees that will be required of them ahead of any construction works commencing. It is more appropriate for this to be included within a full concession package that should also include the removal of all built infrastructure at the end of the concession term. Any concession term over 10 years would usually require public notification. Any application for a longer-term concession term should consider the likely life span of the asset proposed to be installed. This will enable a better discussion to be held with Treaty partners if an RFR trigger is identified and/or declared upfront. This is a high capital investment to only seek a 20-year operational concession.

Concessions and the NTCSA

- 4.1.5 In the event that the applicant pursues a lease as opposed to a licence for heavy infrastructure, DOC has identified a potential conflict with the provisions of Appendix 14 (were they to be applied to a lease) and the provisions of the Ngāi Tahu Claim Settlement Act (NTCSA). Rights of First Refusal (RFR) for 'disposal' of land for a duration of 50 years or longer are afforded to Te Rūnanga by the NTCSA. Leases comprise 'disposal' if the "term of the lease (including rights of renewal or extensions, whether in the lease or granted separately) is, or could be, for 50 years or longer". DOC's view is that any lease (or licence that was operating in effect as a lease) would need to accord with the 50 year RFR limits in the NTCSA, and that construction works as well as provisions for the removal of infrastructure and remediation of the land, would need to take place within the 50 year limit. This conflicts with the current drafting of Appendix 14 which allows unfettered extension of the duration of the licence / lease.

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5 Matters for the Minister to specify (s27)

5.1.1 None identified.

Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 27 February 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011



Comments on a referral application under the Fast Track Approvals Act 2024

Powerhouse Funicular Railways Queenstown Development

Contact Details			
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)		
Contact person	Reuben Daubé		
Contact Number	s 9(2)(a)	Alternative	
Email	fasttrack@heritage.org.nz		

General Comments

1. Bowen Peak Limited (Applicant) has lodged an application for referral of the Powerhouse Funicular Railways Queenstown Development (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has not been provided application documents that are relevant to the archaeological authority application. HNZPT comments as follows:

Consultation and Engagement

4. Heritage New Zealand Pouhere Taonga have not been consulted.

Archaeological Authority Application

5. The Applicant has not provided an archaeological assessment identifying recorded archaeological sites within or within close proximity to the project area.
6. The proposed works associated with the project have the potential to modify or destroy archaeological features and/or deposits associated with the historic workings and occupation of One Mile Creek (archaeological site E41/228), as well as the site of the Queenstown Immigration Barracks—constructed in 1874—and potential associated features. There is also the potential to affect a recorded hut site (E41/204) and associated features and/or deposits in the form of a track, a small dam or reservoir and historic rubbish pits.
7. There is also potential to encounter further unrecorded archaeological material or sites, noting that a number of archaeological sites are recorded within the wider vicinity of the project area.



8. The project area sits within two Wāhi Tūpuna scheduled in the Queenstown Lakes Proposed District Plan, Tāhuna (No. 15a) and Te Taumata o Hakitekura (No. 27).
9. The site is immediately adjacent to a Statutory Acknowledgment area of Whakatipu-wai-māori (Lake Wakatipu) under the Ngāi Tahu Claims Settlement Act 1998. The lake has a long association with the earliest expedition of discovery made many generations ago by the tupuna Rakaihautu.
10. HNZPT notes that there has been no Cultural Impact Assessment provided with this application. The applicant should explore commissioning a report to understand the cultural impacts of this development and how these can be mitigated.
11. Heritage New Zealand Pouhere Taonga considers that an archaeological authority is required prior to works commencing. A fulsome archaeological assessment should be prepared by a consultant archaeologist to assess the effects of the proposed earthworks on the recorded and unrecorded archaeological sites to accompany the application for an archaeological authority.
12. Effects on Archaeological Values
13. In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required.
14. As no consultation with HNZPT has occurred, this has not been discussed with the Applicant.

Resource Consent Application

15. The Applicant is also applying for a resource consent application which will not generate adverse effects on historic heritage.
16. There are no specific identified sites of Cultural Heritage on the Operative Queenstown Lakes District Plan, nor listed on The New Zealand Heritage List / Rārangī Kōrero (the List) around the proposed development area.

Conclusion

17. If the project is referred, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:
 - A fulsome archaeological assessment;
 - Appropriate methodologies and strategies proposed;
 - Appropriate draft management plan and research strategy;
 - Evidence of appropriate consultation with tangata whenua; and
 - Appropriate proposed conditions.



Te Rūnanga o NGĀI TAHU

Te Rūnanga o Ngāi Tahu
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Friday 27 February 2026

Stephanie Frame, Acting General Manager Delivery and Operations
Ministry for the Environment
WELLINGTON

Uploaded through the Fast-track Portal

Tēnā koe Stephanie,

Te Rūnanga o Ngāi Tahu comments on referral application under the Fast-track Approvals Act 2024 – Restoring the Reserve - Powerhouse to Peak Cable Car & Fernhill Heights Development Project [FTAA-2502-1025]

1. Introduction

- 1.1 Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) welcomes the opportunity to provide comments on the referral application made by Bowen Peak Limited (the **Applicant**) for the Restoring the Reserve - Powerhouse to Peak Cable Car & Fernhill Heights Development Project, in Tāhuna (Queenstown) (the **Project**).
- 1.2 Te Rūnanga seeks that the referral application is **declined** by the Minister on the basis that it does not provide adequate information to determine the Project's potential impacts on Ngāi Tahu Treaty settlements as well as the environment, and due to the applicant's failure to meet the general application requirements and consultation requirements (prior to lodging the application) prescribed under the Fast-track approvals Act 2024¹ (**Fast-track approvals Act**). Our full comments on the Project are set out below (see **Section 3**). Te Rūnanga also supports the comments made on behalf of respective Papatipu Rūnanga.

¹ Section 11(1)(b) consultation requirements with iwi authorities and hapū for referral application and section 13(4)(k) (i) & (ii) referral application general requirements

2. Te Rūnanga o Ngāi Tahu

- 2.1 These comments are made on behalf of Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) which is the statutorily recognised representative tribal body of Ngāi Tahu Whānui, as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (**TRONT Act**).
- 2.2 Te Rūnanga encompasses five hapū, Kati Kurī, Ngāti Irakehu, Kati Huirapa, Ngāi Te Ruahikihiki, Ngāi Tūāhuriri and 18 Papatipu Rūnanga, who uphold the mana whenua and mana moana of their respective rohe.
- 2.3 Papatipu Rūnanga who have shared interests in Tāhuna are:
- Te Rūnanga o Moeraki;
 - Kati Huirapa Rūnaka ki Puketeraki;
 - Te Rūnanga o Ōtākou;
 - Waihōpai Rūnaka;
 - Te Rūnaka o Awarua;
 - Te Rūnanga o Ōraka-Aparima; and
 - Hokonui Rūnanga.
- 2.4 Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā (see **Appendix One**) and has done so since before the Crown began exercising its powers in New Zealand from 1840. The Takiwā covers most of Te Waipounamu and its surrounding islands, constituting over half of New Zealand’s landmass, coastlines and waterways. The Crown and Parliament recognise and affirm Ngāi Tahu rangatiratanga in our Takiwā through:
- a) Article II of Te Tiriti o Waitangi (**Te Tiriti**);
 - b) the 1997 Deed of Settlement between Ngāi Tahu and the Crown; and
 - c) the Ngāi Tahu Claims Settlement Act 1998 (**NTCSA**).
- 2.5 As recorded in the Crown Apology to Ngāi Tahu (see **Appendix Two**), the Ngāi Tahu Settlement marked a turning point, and the beginning of a “new age of co-operation”. The Crown apologised for its “past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries” and confirmed that “it recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui”. Those commitments are fundamental to the fast-track regime.
- 2.6 Te Rūnanga requests that the Minister accord these comments with the status and weight of the tribal collective of Ngāi Tahu Whānui comprising over 85,000 registered iwi members. Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui “for all purposes”, Te Rūnanga accepts and respects the right of Papatipu Rūnanga to make their own comments. Te Rūnanga understands that respective Papatipu Rūnanga (and

their Regional Environmental Entities) have been separately invited to comment on the Project.

3. Comments

3.1. Our comments on the referral application for the Project are set out below and are guided by the relevant principles and provisions of the Ngāi Tahu Treaty settlements.

Ngāi Tahu Settlement principles

3.2. Te Rūnanga considers the following Ngāi Tahu settlement principles are applicable for this referral application:

- Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā².
- The Crown and agents of the Crown must act in good faith³.
- The Crown committed to a new age of co-operation with Ngāi Tahu.
- All areas and places within the Ngāi Tahu takiwā are important and form part of an intertwined network of values, places and resources that are relevant to Ngāi Tahu tribal history, contemporary values and the future of the tribe.
- Settlement is a platform from which Ngāi Tahu can rebuild⁴.
- Settlement provided a basis for the continuing evolution of Ngāi Tahu as a tribe and as a people⁵.

Consultation on the referral application

3.3. The applicant has acknowledged their mistakes in relation to their previous understanding of consultation requirements with Te Rūnanga and Papatipu Rūnanga. At page 9 of their new Appendix 1A they have stated that they take on board the three recommendations from Minister Potaka. With this in mind, they intend to carry out work to understand any and all Treaty redress obligations for the area, provide more information to enable their application to be assessed and engage and consult with relevant Māori groups in a meaningful way. Te Rūnanga can confirm that the application documents were provided by the applicant to give more time to consider them, and that was appreciated.

² Further details are set out paragraph 2.5 above.

³ The Crown's Apology recognises that previously the Crown failed to act in good faith, and left Ngāi Tahu in a state of poverty and deprived Ngāi Tahu the opportunity to develop.

⁴ For example through the mechanisms which enable the purchase of Crown lands (Right of First Refusal) and enabling Ngāi Tahu to exercise their kaitiaki responsibilities through the engagement template created by Statutory Acknowledgements.

⁵ The settlement is acknowledging that Ngāi Tahu will continue to develop, create an economic footprint for the benefit of Ngāi Tahu people, form a basis from which Ngāi Tahu can express its ancestral relationship with the Ngāi Tahu takiwā into the future.

A process agreement has been signed between Bowen Peak Limited and the seven Papatipu Rūnanga within whose takiwā this project is intended to occur. The agreement sets out the principles that apply to discussions between the parties but acknowledges that the document is not a relationship agreement between the parties.

Appendix 12 of the applicant's information contains a generic process for engagement with tangata whenua. There is no indication of what step the applicant believes has been achieved to date. From the perspective of Te Rūnanga, there have only been very preliminary levels of engagement to date and no meaningful consultation with either Papatipu Rūnaka or Te Rūnanga. Consequently, the applicant has not met the general information requirements for a referral application as prescribed under the Fast-track approvals Act⁶. As such, Te Rūnanga is unable to determine whether the Project will be consistent with Ngāi Tahu Treaty settlements and understands the Minister may decline the referral application for this reason⁷.

Statutory Acknowledgement

- 3.6. The project site (specifically the 'Powerhouse Precinct') is adjacent to the Whakatipu-WaiMāori (Lake Wakatipu) Statutory Acknowledgement. Ngāi Tahu association with Whakatipu-wai-māori is detailed in schedule 75 of the NTCSA (refer to **Appendix Three**) and includes important Ngāi Tahu histories and traditions relating to the lake. It is an important source of freshwater, with the lake itself being fed by hukawai (melt water). These waters hold the highest level of purity and were accorded traditional classifications by Ngāi Tahu that recognised this value. Thus, the lake sustains many ecosystems important to Ngāi Tahu.
- 3.7. Given the immense significance the lake holds for Ngāi Tahu, it is critical that any potential discharging activities generated by the Project are undertaken in a manner that does not degrade the purity of this source of freshwater. The applicant states that there is no direct involvement with the lake⁸ but makes no acknowledgement of the interconnection between One Mile Creek and the lake. The applicant acknowledges in Appendix 28 that resource consent may be required from the Otago Regional Council in relation to works within proximity to One Mile Creek and residential earthworks for Fernhill Heights. This includes consents for discharge to water. The One Mile Creek catchment flows into the lake. Te Rūnanga is therefore concerned about the potential of discharges within that catchment having an impact on the lake.

Te Rūnanga is acutely aware of the problems that Queenstown Lakes District Council is facing with its existing wastewater infrastructure, with wastewater discharges currently going directly into the Kimiākau/Shotover River⁹. The Kimiākau/Shotover River flows into the Kawerau river and ultimately into the Mata-au/Clutha River (which is a Statutory Acknowledgement – Schedule 40), According to Appendix 3 page 10 of the applicant's information, a detailed analysis of the existing network capacity has not been undertaken

⁶ Section 11(1)(b) consultation requirements with iwi authorities and hapū for referral application and section 13(4)(k) (i) & (ii) referral application general requirements.

⁷ Section 21 (5) (a)(i)

⁸ Appendix 20 page 13

⁹ through the use of emergency powers under the RMA

at this stage, but it also states that given other factors, existing capacity will be available. There is no analysis of the impact of this additional loading on the Shotover Wastewater Treatment Plant. Te Rūnanga is concerned about the ability of the Council's existing infrastructure to handle current and forecasted future needs, (in addition to this potential application,) given the impacts of the current system on Ngāi Tahu values, including nohoanga sites and Statutory Acknowledgements.

Taonga Species

2.9. The special association Ngāi Tahu have with taonga species within the Ngāi Tahu Takiwā has been acknowledged by the Crown in the NTCSA¹⁰, with a list of taonga species provided in Schedule 97 (refer to **Appendix Four**) which includes 49 bird species, 54 plant species and 6 marine mammals. Te Rūnanga understands that the project requires approval under the Wildlife Act 1953, and that there is an intent to facilitate breeding of avifauna including taonga species. The applicant did not consider that it needed to provide further information regarding the nature of the Wildlife Permits in the referral application. Any proposals regarding taonga species need to ensure a partnership approach with Papatipu Rūnanga and need to be guided by their expertise.

3. Decision Sought

4.1 Te Rūnanga thanks the Minister for the opportunity to comment on the referral application.

4.2 Te Rūnanga considers that the referral application does not provide adequate information to determine the project's potential impacts on Ngāi Tahu Treaty settlements, as well as potential adverse effects on the environment. Further, Te Rūnanga does not consider that the applicant has met the referral application requirements (specifically general information and consultation requirements) prescribed under the Fast-track approvals Act. As such, Te Rūnanga does **not support** the referral application in its current form and seeks that the application is **declined** by the Minister.

Nāku noa nā,



Maru Rout
Programme Leader- Mauri, Te Ao Tūroa
Te Rūnanga o Ngāi Tahu

¹⁰ Section 288 of the NTCSA. Ngāi Tahu association includes cultural, spiritual, historic, and traditional.

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Appendices:

Appendix One – Map of takiwā of Ngāi Tahu
Appendix Two – Crown Apology to Ngāi Tahu
Appendix Three- Statutory Acknowledgement- Whakatipu-Wai-Māori
Appendix Four- Taonga Species Schedule