



Powerhouse Fast-track Application

Otago Regional Council Pre-Application Information Response



Prepared by Otago Regional Council

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File: RMFT25.075

Date: 11 December 2025

Guy Hingston
Director
Bowen Peak Ltd

Dear Sir

Pre-Application Information Response

Thank you for providing the additional information to the Otago Regional Council (ORC) for review prior to lodging your Fast Track referral application for the Powerhouse Fast Track Application.

Thank you for also engaging in a productive conversation with ORC prior to lodging your referral application.

ORC's internal team have reviewed the following additional information:

1. Restoring the Reserve – APPENDIX 01 – DRAFT Applicant Response
2. Restoring the Reserve – APPENDIX 02 – Indicative Program
3. Restoring the Reserve – APPENDIX 03 – Three Waters Servicing
4. Restoring the Reserve – APPENDIX 04 – Geotech Risks and Hazards Report
5. Restoring the Reserve – APPENDIX 05 – Transport Assessment
6. Restoring the Reserve – APPENDIX 06 – Bowen Peak Ski Area Feasibility Report
7. Restoring the Reserve – APPENDIX 07 – Preliminary Landscape Assessment Report
8. Restoring the Reserve – APPENDIX 08 – Policy and Planning Report
9. Restoring the Reserve – APPENDIX 09 – Ecology Report
10. Restoring the Reserve – APPENDIX 10 – Economic Assessment
11. Restoring the Reserve – APPENDIX 11 – Alpine Chalet Structural Plans
12. Restoring the Reserve – APPENDIX 12 – Take Tuia Cultural Strategy
13. Restoring the Reserve – APPENDIX 13 – Queenstown Lakes Community Housing Trust Agreement
14. Restoring the Reserve – APPENDIX 14 – Proposed Licences to Occupy
15. Restoring the Reserve – APPENDIX 15 – Doppelmayr Garaventa Capability Statement and Funifor Plans
16. Restoring the Reserve – APPENDIX 16 – Architectural Design Report

17. Restoring the Reserve – APPENDIX 17 – Landscape Visualisations
18. Restoring the Reserve – APPENDIX 18 – BAXTER DESIGN One Mile Powerhouse Reserve Sketches
19. Restoring the Reserve – APPENDIX 19 – Cadastral Plan Set
20. Restoring the Reserve – APPENDIX 20 – Proposed Aerial Ropeway Station & Pylon Positions
21. Restoring the Reserve – APPENDIX 21 – Revised Ropeway Centreline Plans
22. Restoring the Reserve – APPENDIX 22 – Proposed Fernhill Heights Subdivision Releases and 3D Road Network Plans
23. Restoring the Reserve – APPENDIX 23 – Aurora Energy Supply Availability – combined
24. Restoring the Reserve – APPENDIX 24 – Zealandia Predator-free Fence Design and Maintenance
25. Restoring the Reserve – APPENDIX 25 – Land Title Table

Consents Team Comments

A policy planning report has been provided by John Edmondgeos 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

To date, 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

Given this, the following feedback provided within ORC's s17 comment are still relevant:

- Wetlands - Any wetland over 800m is a Regionally Significant Wetland. Please carefully consider the rules of Chapter 12 and 13 if there are any Regionally Significant Wetlands within / near the project envelope. There are potential consent requirements under the Regional Plan: Water for activities in or near a Regionally Significant Wetland. Some activities are Non-Complying or Prohibited in the Regional Plan: Water. If there are any Natural Inland Wetlands within / near the project envelope, the rules of the NES-Freshwater would also need to be considered.
- 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 (e.g., rate of take), consent for the taking of groundwater might also be required. If there were to be any long-term dewatering e.g. for dewatering of foundations near the lake, consent for a bore (and potentially for a groundwater take) would similarly be required.

- Residential earthworks – Due to the scale of earthworks, consent for residential earthworks would be required. Consent would not be required for the entire activity. It would only apply to earthworks associated with residential development:

Residential development means:

The preparation of land for, and construction of, development infrastructure and buildings (including additions and alterations) for residential activities and includes retirement villages. It excludes camping grounds, motor parks, hotels, motels, backpackers' accommodation, bunkhouses, lodges and timeshares. The terms development infrastructure, residential activity, and retirement village are defined in the National Planning Standards.

- Contaminated sites – The powerhouse surrounds are identified as a HAIL site. There will be an investigation by a suitably qualified person as part of the application. Disturbance of a contaminated site would require Consent under the Regional Plan: Waste.
- Watercourses – Structures over watercourses (fibreglass boardwalk from the powerhouse up to midway clearing along one mile stream) are proposed. There are rules in the Regional Plan Water related to such structures. Consent may be required.
- 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, disturbance, would in most cases require consent.

Conditions of Consent

Council has a range of standard conditions that are typically applied to the consents outlined above. A copy of these standard conditions are available upon request.

Natural Hazards Team Comments

The assessment identifies the main potential natural hazards present in the application area, active faulting, landslide, rockfalls and debris flow, the hazards team don't have any concerns with the quality/findings of the assessment completed, but note it comprised only a basic desktop assessment.

No on-site investigations have been undertaken at this stage, commentary in the Geoconsulting assessment is based only on desktop assessment of existing data sources (e.g. ORC regional-scale datasets, investigations for nearby sites, review of LiDAR and aerial imagery).

Any more detailed geotechnical investigation is intended to be completed at a later stage, and the natural Hazards Team agree with the suggested scope of these.

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 (e.g. see Figure 4.8, copied below).

Table 4.2 (also copied below) of the guidance outlines the assessment required, outputs, and applications of information for each level of detail class.”

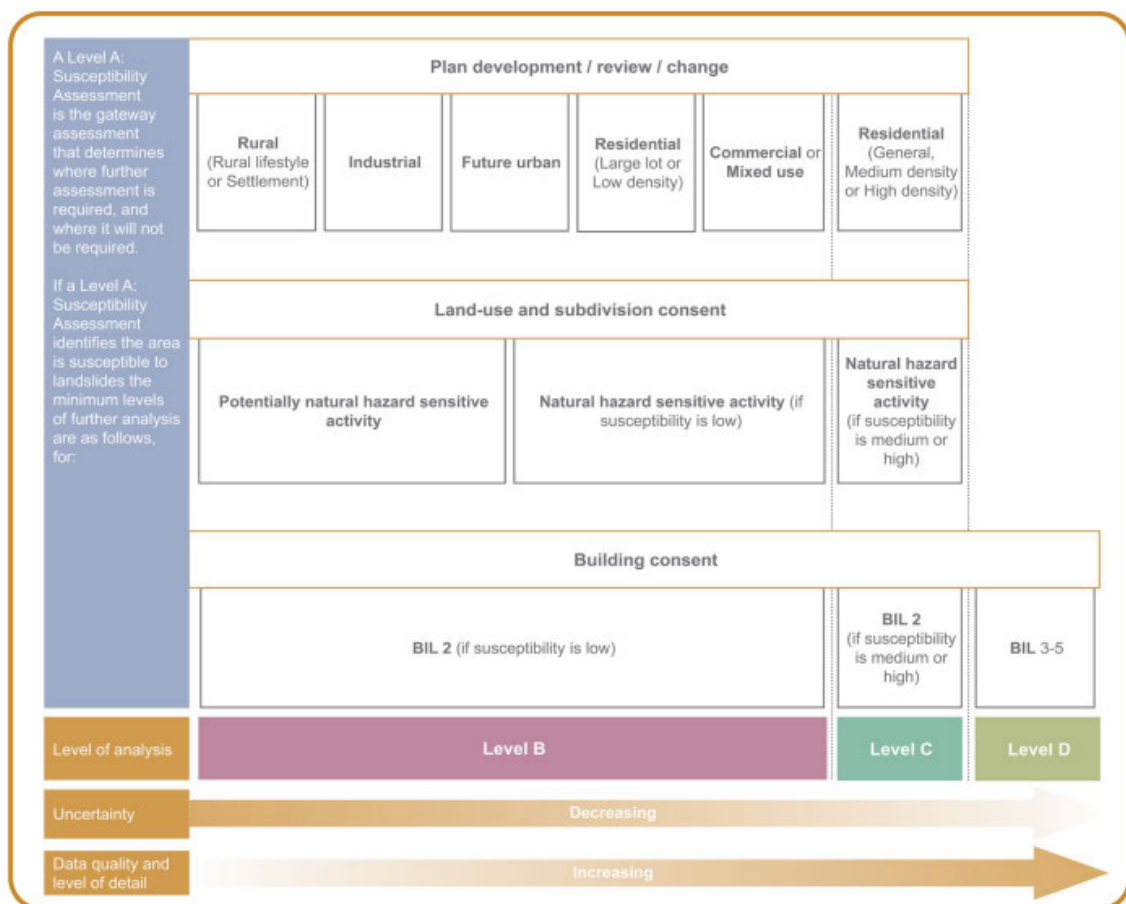


Figure 4.8: Different levels of analysis recommended for plan development/review/change, land-use and subdivision consent and building consent. See Section 6 and Table 4.2 for more detailed information.

tower locations, ideally guided by the Effects Management Hierarchy framework outlined in the National Policy Statement for Freshwater Management (NPS-FM 2020).

- Monitoring should include assessment of wetland condition (vegetation and soil) as an indicator of hydrological change.
- Should monitoring identify adverse effects, a comprehensive wetland restoration plan must be developed and implemented.
- If naturally uncommon ecosystems are identified, avoidance of impacts should occur to prevent loss of ecosystem function.

In terms of the opportunities for ecosystem enhancement stated, both options of wild pine control and the construction of predator-free sanctuaries would provide ecological benefit to indigenous biodiversity (species, their habitats, and the ecosystems they are found in), although it's not clear how much to offset the development until further work on the cost-benefit analysis is completed. Used as complementary approaches, it would be of greatest ecological benefit in the area near the development.

The following areas in the application are noted for improvement:

- Field verification: a reliance on desktop assessment; the report does acknowledge that targeted surveys are still required, with its purpose being a high-level document and limited to 6 pages only. This does limit certainty in the application.

Overall, the report seems sound and well-structured. However, its reliance on future surveys means it remains preliminary rather than substantive as the author notes. For decision-making, it provides a solid foundation but requires detailed follow-up fieldwork and clearer assessment of risks.

Transport Team 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
- Influencing land use via regional policy statements and regional plans developed in accordance with the Resource Management Act 1991

In fulfilling these responsibilities, ORC has an interest in Bowen Peak's 'Restoring the Reserve' fast-track referral application as an urban development and transport project which will generate significant 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.

Moreover, we question 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 assess the integration of the proposed suburb across sustainable transport modes below with the assumption that most trips will require travel outside the proposed suburb.

Proposed future Powerhouse Gondola: while the applicant 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 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.

Existing public transport bus: 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.

Public transport bus service expansion: we 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. We would also be challenged to provide services due to the suburb roads' steep grade and sharp corners.

Active travel: we note the increased 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.

Car parking considerations: 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). We would require a detailed description of the service and a demonstration of its economic viability, effectiveness for reducing private vehicle demand, complement to other sustainable travel modes (walking, cycling and existing public transport) before we can consider it as a component of the application. Specifically the service would need to adhere to the Otago Regional Public Transport Plan’s exempt service policy, NF P4.

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.

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 per the Fast Track Approvals Act s.22 and the pORPS EIT-TRAN-P21(1) and P22 policies.

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 Team Comments

The Policy Team have reviewed the additional information provided since ORC's original s17 comments, including the applicant's updated "Policy and Planning Report – 26 November 2025" prepared by John Edmonds & Associates Ltd.

While the applicant's policy and planning report provides a broad policy narrative and identifies several potential areas of alignment with the ORPS and pORPS, the assessment remains high-level and does not address the specific issues ORC highlighted in earlier feedback.

In several instances, the conclusions reached in the policy and planning report, which suggest that the proposal aligns with regional policy direction, are not supported by the level of detail or analysis contained in the accompanying technical documents. This is highlighted further in the assessment below.

Regional Policy Statements

To assist with the assessment of both the ORPS and the pORPS, it is noted that the Clean Appeals Version of the pORPS¹ shows all provisions appealed to the High Court and Environment Court, along with text changes from resolved appeals and Clause 16(2) amendments. In this version, unshaded black text is not under appeal, grey-shaded text is under appeal.

The majority of the pORPS provisions are no longer under appeal. Therefore, the provisions of the pORPS can be relied on, with the exception of the following chapters:

- a. CE – Coastal environment.
- b. ECO – Ecosystems and indigenous biodiversity.
- c. HCV – Historical and cultural values.
- d. NFL – Natural features and landscapes.
- e. UFD – Urban form and development.

Based on the information provided within the pre-application documents, ORC consider that the assessment of the ORPS and pORPS should have a particular focus on the following topics.

Definitions

ORC note that pORPS includes definitions related to:

- Nationally significant infrastructure, which includes rapid transit services
- Regionally significant infrastructure, ski area infrastructure

¹ <https://www.orc.govt.nz/media/qt0lk0fl/clean-appeals-version-porps-21-17-october-2025.pdf>

Within the substantive application, ORC suggest that a detailed assessment of the proposal against the relevant pORPS definitions be provided.

If the proposal is confirmed to constitute regionally and/or nationally significant infrastructure under the pORPS definitions, the substantive application should include an assessment of how the infrastructure aspects of the application achieve the infrastructure objectives and policies. This should include consideration of provisions that recognise the importance of enabling significant infrastructure while appropriately managing its environmental effects. The assessment should also address the project's functional and operational need, integration with existing transport and utility networks, and how the design and construction will promote resilience to climate change and natural hazards.

Areas of Alignment Acknowledged in the Applicant's Assessment

ORC agrees the application aligns with several provisions of the pORPS and ORPS. The proposal includes a substantial programme of pest-management, wilding pine removal, and native revegetation within the Te Taumata o Hakitekura Predator-free Sanctuary (275+ hectares across the upper One Mile and Two Mile Creek valleys). This initiative aims to restore the area's pre-Pākehā ecological character and support a diverse assemblage of indigenous fauna, including ground-dwelling species such as kiwi, takahē and kākāpō, and canopy or forest-margin species such as tūī, korimako, kākā, kea, kererū, tauhou, kākārīki, kakaruai, kārearea, kōkako, mohou, pīwauwau and pīwakawaka. Two small predator-free sanctuaries (3 hectares total) are also proposed within the One Mile Powerhouse Sanctuary to support native bird breeding habitat near Lake Whakatipu. These ecological restoration and enhancement measures contribute to increased extent and occupancy of indigenous biodiversity, consistent with pORPS ECO-P8, and represent pest-management outcomes anticipated by pORPS LF-P16A.

The proposal also provides for upgraded and new public access opportunities. This includes the re-opening and extension of the One Mile Creek walkway. In addition, the Bowen Peak Gondola will enable access to seasonal attractions such as a mountain bike park, a new Bowen Peak downhill trail, and the proposed Bowen Peak Ski Area. Collectively, these recreation, access and tourism elements may align with RPS Policy 5.3.5, which recognises the social and economic value of outdoor recreation and tourism within outstanding natural features and landscapes. Elements of the proposal may also support RPS Policy 1.1.1 (economic wellbeing) by enabling the use and development of natural and physical resources in a way that could contribute to community wellbeing.

Urban Development

The updated assessment acknowledges that Fernhill Heights is located outside the Queenstown Urban Growth Boundary (UGB), but continues to rely on a broad characterisation of the proposal as a logical extension of Queenstown's urban form. This does not resolve the specific questions ORC raised.

The applicant's policy report summarises NPS-UD and pORPS UFD provisions, but does not provide a targeted assessment of:

- How the proposal gives effect to UFD-O1 and UFD-P4, particularly regarding consolidated, well-connected urban form and integration with development infrastructure
- How the assessment has reconciled competing policy directions (e.g., enabling development vs managing outward expansion)
- How lack of alignment with the Queenstown Spatial Plan's priority development areas has been addressed.

For the substantive application, ORC expect a targeted and structured assessment demonstrating how the proposal gives effect to the UFD chapter, reconciles competing policy directions, and addresses its location outside the UGB and priority development areas identified in the Queenstown Spatial Plan.

Natural Hazards

The applicant has provided a "Preliminary Geotechnical Assessment" prepared by Geoconsulting Ltd. This report indicates that further detailed hazard investigations are intended. As highlighted in the ORC's natural hazard team comment above, further site-specific natural hazard assessment is supported, as the preliminary assessment does not yet provide sufficient site-specific information to characterise the natural hazard risks affecting the development area. Although the applicant notes that additional hazard information exists, the accompanying policy assessment continues to rely on generic statements that the proposal will meet the requirements of the RPS and pORPS.

ORC's earlier feedback asked for a clear demonstration of how the project meets:

- HAZ-NH-P2 (risk identification), and
- HAZ-NH-P3 (policy direction for new activities: avoiding significant risk, ensuring tolerable risk does not exceed tolerable thresholds, and maintaining acceptable risk).

The current assessment does not identify the level of natural hazard risk the activity is exposed to, explain how the relevant risk category (significant, tolerable or acceptable) has been determined, or demonstrate how proposed avoidance, mitigation, or management measures give effect to the outcomes required by HAZ-NH-P3. In the absence of this information, it is premature to conclude that slope stability can be maintained or that risks to downhill properties can be appropriately minimised in a manner consistent with regional natural hazard policy direction.

For the substantive application, ORC expects a detailed analysis of how the project aligns with the natural hazard policy direction in the RPS and pORPS. This should be supported by technical reports that clearly identify the nature and extent of natural hazard risks on the site and set out how avoidance, remediation and mitigation measures have been applied in accordance with regional policy requirements.

Outstanding Natural Landscape

The applicant has provided a "Preliminary Landscape Assessment Report" prepared by Patch Landscape. This report has concluded that the resulting landscape and visual effects, particularly on the mid to upper slopes above Fernhill, the saddle, and summit areas, are assessed as

moderate-high, reflecting both the scale of change and the prominence of the open and natural mountain setting.

This conclusion has not been carried through into the assessment of the RPS and pORPS provisions, in particular pORPS NFL-P2 and ORPS Policy 3.2.4, which state:

Protect outstanding natural features and landscapes from inappropriate subdivision, use and development by:

- (1A) avoiding exceeding the landscape capacity of the natural feature or landscape,*
- (1) maintaining the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding,*
 - (2) avoiding, remedying or mitigating other adverse effects; and*
 - (3) managing the adverse effects of infrastructure on the values of outstanding natural features and landscapes in accordance with EIT-INF-P13*

Protect, enhance or restore outstanding natural features, landscapes and seascapes, by all of the following:

- a) ... ;*
- b) Beyond the coastal environment, maintaining the values (even if those values are not themselves outstanding) that contribute to the natural feature, landscape or seascape being outstanding;*
- c) Avoiding, remedying or mitigating other adverse effects;*
- d) Encouraging enhancement of those areas and values that contribute to the significance of the natural feature, landscape or seascape.*

The updated assessment continues to rely on broad statements that visual effects are minor and contextually appropriate, but does not address:

- The landscape assessment conclusion that the development will have moderate–high landscape and visual effects.
- The cumulative introduction of a 1,333-unit residential development in a highly visible ONL context.
- The need to demonstrate protection of ONL values as required by the pORPS and RPS
- The direction in NFL-P2(1A) to avoid exceeding the landscape capacity of the natural feature or landscape.

For the substantive application, ORC expects a clear, effects-based landscape and policy assessment that reconciles the Patch Landscape findings with the ONL policy framework, which explicitly addresses landscape capacity and cumulative effects, and demonstrates whether and how the proposal can meet the landscape direction in NFL-P2 and Policy 3.2.4. If the landscape outcomes set out in the ORPS and pRPS cannot be achieved, it is suggested that this is acknowledged within the policy assessment of the substantive application.

Ecosystems & Indigenous Biodiversity

The applicant has provided a “Independent Ecological Scoping Assessment” prepared by Restore NZ which has provided a high-level ecological scoping and feasibility assessment which has provided a preliminary desktop assessment intended to identify key ecological considerations. This assessment indicates 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. It also states that the proposal includes initiatives with genuine potential to deliver large-scale ecological enhancement if they are carefully designed, implemented to best-practice standards, and supported by long-term management and monitoring.

The scoping assessment notes that if the proposal progresses, the next stage should include a comprehensive desktop review, targeted field surveys, and consultation with DOC, iwi, and relevant specialists. This work is intended to verify ecological values, refine the design to avoid and minimise effects, and assess whether the proposed enhancement measures are adequate as mitigation, offsets, or compensation. This further assessment is supported, as the current scoping report does not yet provide sufficient information to address key requirements.

In particular, it has not:

- Identified whether areas within or adjoining the site may qualify as Significant Natural Areas under the NPS-IB 2023 or pORPS ECO-P2.
- Demonstrated how significant natural areas, indigenous species, and ecosystems that are taaka will be protected in accordance with pORPS ECO-P3 and ORPS Policy 3.2.2.
- Applied the effects-management hierarchy as required by pORPS ECO-P4.
- Shown how indigenous biodiversity will be maintained in accordance with pORPS ECO-P6.

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.

For the substantive application, ORC expects a detailed ecological and policy assessment that identifies any potential SNA values, applies the effects-management hierarchy, and demonstrates how the proposal will avoid adverse effects on highly vulnerable biodiversity. This should include comprehensive field-based survey information, clear mapping of ecological values, and an effects assessment that responds directly to NPS-IB 2023 and pORPS ECO provisions.

Compliance Team Comments

Based on the concept plan provided in the application, the Fernhill Closed Landfill falls inside the proposed development area. As indicated in the application, there are two verified HAIL sites referenced.

HAIL.00465.01 - Fernhill Closed Landfill.

The contamination status of this closed landfill was categorised as acceptable; however, based on the High Priority Landfill Investigation Report of the Fernhill Former Landfill (High Priority Landfill Investigation Report - Fernhill Former Landfill, Queenstown, Jenny Lowe, July 2000), only one upstream and one downstream sample of surface water were collected and analysed, and no soil sampling appears to have been undertaken, which implies that the site has not been investigated. The relevant HAIL Category is G3 - Landfill sites.

Based on the SEMNZ Environmental Sensitivity Ranking of Landfill Sites in the Otago Region, the depth to groundwater beneath the site is estimated at 6 metres below ground level. The SEMNZ

report identified this landfill as High Priority due to the close proximity of groundwater users and the overall high total score in the Environmental Sensitivity Ranking.

Given the topography, offsite environmental receptors and the absence of soil sampling information about the landfill, there exists a risk that earthworks in the vicinity of the landfill may mobilise contaminants, therefore, further investigation of the site is justified.

HAIL 02036.01 - Lake Esplanade Mine Tailings



Fernhill closed landfill and lake esplanade mine tailings

According to the information contained in the application, a multistorey car park and roads are planned in the vicinity of HAIL.02036.01. Further investigation of this area is required. Historical mine tailings and races have been identified in the gully of One Mile Creek above the Lake Esplanade Road.

The relevant HAIL category is E7 – Mining industries (excluding gravel extraction), including exposure of faces or release of groundwater containing hazardous contaminants or the storage of hazardous wastes, including waste dumps or dam tailings. Based in the information in the HAIL Database, no HAIL sites currently appear within Lot 1 DP 20613.

As noted in the pre-application letter to the applicant on 18 March, the Compliance Team also advised that:

- They received notification on 27 January 2025, proposing to undertake activities under the National Environmental Standards for Commercial Forestry (NES-CF) in the area of the proposed Fernhill Hights Suburb from 12 February 2025 – 12 February 2026. The works have not yet started as the contractor is in communication with Queenstown Lakes District Council (QLDC) to determine if the area is classed as an Outstanding Natural Landscape within their Proposed District Plan.
- QLDC have confirmed that the area is not classed as an 'urban area' as defined by the NES-CF and the contractor has stated to me that they're seeking an industry expert to

clarify the establishment of trees (if planted deliberately or if wilding pines), but is under the impression that they were planted intentionally. These details are important, as it will determine if the activity is regulated under the NES-CF or Regional & District plan rules – the trees must not be located within an ‘urban area’ and be deliberately established for commercial purposes to be regulated under the NES-CF.

- Given the location’s Erosion Susceptibility Classification zone is green, essentially all NES-CF activities would be permitted under the NES-CF Regulations. There is the potential that the contractor would require a resource consent under the Regional Plan: Water for Rule 13.5.3.1 if the intend on cable hauling trees through rivers within the block, which has been brought to the harvesting contractor’s attention.
- The Compliance Team have yet to receive a Management Plan for the notification, as harvesting methods have not been finalised according to the contractor.

Limitations

It is noted that this information has been provided based on a discussion and draft copy of your referral application and therefore there may be other requirements identified once your application is lodged.

The costs related to this service include but are not limited to; administration, research, meeting time, taking minutes, distribution of meeting notes, and question follow ups. 30 minutes of work carried out by the Consents Officer is free of charge. The remaining work is charged at the relevant officer's hourly rate in accordance with the fees and charges schedule which can be found [here](#).

Next Steps

If you believe any of this information is not relevant to your proposal, have any queries or require clarification on the information provided please contact me on 0800 474 082 or by emailing me at s 9(2)(a) [REDACTED]

Andrew Maclennan
Consultant Planner
11 December 2025