

Memorandum on Completeness and Scope

File	FTAA-2605-1236
Application	NZSki Limited Remarkables Ski Area Upgrades and Doolans Expansion Project
To	Manager LOA/ Team Leader LOA
From	
Date	7 July 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the NZSki Limited Remarkables Ski Area Upgrades and Doolans Expansion Project application, lodged by NZSki Limited (the Applicant), received by the Fast-track Team on 20 May 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Application is a listed project.
6. The Application was lodged on 20 May 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application

complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was subject to a further information request therefore the date by which the EPA must make a decision under 46 is 7 July 2026.

7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The project is described in Schedule 2 of the Act as:

“Upgrade existing infrastructure at The Remarkables Ski Area, including a new passenger transport lift, carparking areas, and expanding the ski field into the adjacent Doolans Basin.”

9. The approximate geographical location is identified in Schedule 2 of the Act as:

“Rastus Burn Recreation Reserve, Remarkables Mountain Range, Queenstown”

10. The application provides the following summary of the project:

“The key Project works within the existing Remarkables Ski Area and the Lower Remarkables include:

- a) Upgrades to existing infrastructure services and associated structures including infield power distribution, water, wastewater, stormwater, communications, and snowmaking infrastructure.*
- b) Upgrades to the existing Lower Remarkables car park area, including the provision of additional bus/shuttle and ride sharing facilities and the creation of two new car parks at the base of the access road.*
- c) Expansion of the existing Rastus Burn Base Building and reconfiguration of the arrival surrounds to resolve existing capacity demand issues and to cater for the increased capacity of the ski field as a result of the Project.*
- d) Construction and use of the proposed Doolans Gondola providing access into the Doolans Basin, including construction of the new Base Station adjacent to the Rastus Burn Base Building and construction of gondola towers, cables and associated infrastructure up to the new Helicopter Ridge Midstation. This will provide access to the ski field expansion and accommodate approximately 2400 passengers per hour, with cabins that hold up to 10 people.*
- e) Upgrades to and establishment of access roads and ski trails to provide vehicular access and ski return rails to and from the Doolans Basin.*
- f) Installation of new operational controls to maintain the health and safety of ski field users. Such controls include wayfinding signage, barriers/gates, permanent safety fencing/netting, snow fences, avalanche control, boundary markers.*

The key Project works proposed within the Doolans Basin include:

- a) *Establishment and use of the proposed Doolans Gondola from the Rastus Burn Base Building into the Doolans Basin. This includes the new Helicopter Ridge Midstation (with a patrol hut), and the new Doolans Return Station directly adjacent (and connected) to the proposed Doolans Cabin Building. It also includes construction of gondola towers, cables and associated infrastructure.*
 - b) *Establishment and use of the proposed multi-purpose Doolans Cabin Building, designed to accommodate gondola cabin parking, integrated cabin maintenance, storage, bathroom facilities, café facilities and emergency shelter space.*
 - c) *Establishment and use of ski trails and access roads between the gondola midstation, the Doolans Cabin Building and associated infrastructure.*
 - d) *Construction of a learners snowsports area adjacent to the Doolans Cabin Building with a covered passenger conveyor belt, supported by snowmaking infrastructure.*
 - e) *Establishment of supporting services and facilities in the Doolans Basin, including power, water, wastewater, stormwater, communications and snowmaking facilities.*
 - f) *Installation of operational controls to maintain the health and safety of ski field users. These controls include wayfinding signage, barriers/gates, permanent safety fencing/netting, snow fences, avalanche control and boundary markers.”*
11. The application does relate solely to the listed project because the very broad project description in Schedule 2 of the Act “*Upgrade existing infrastructure at The Remarkables Ski Area, including a new passenger transport lift, carparking areas, and expanding the ski field into the adjacent Doolans Basin*” can be easily said to encompass the activities summarised in the project description.

Fast-track consenting application process

Legislative context

12. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
- complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
13. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

14. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, or one substantive application for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
15. This application has been lodged by NZSki Limited. This person is an authorised person under the Act because they are the authorised person identified for the listed project under s42(1).
16. The approvals being sought are:
 - a. an approval described in section 42(4)(a), (c) or (d) (resource consent, certificate of compliance or designation);
 - b. an approval described in section 42(4)(e) (concession), **checklist D1**;
 - c. an approval described in section 42(4)(h) (wildlife approval), **checklist E**;
 - d. an approval described in section 42(4)(j) (complex freshwater fisheries approval), **checklist G**.
17. All of the above listed approvals are of the type set out in section 42(4) of the Act.
18. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 42 variation to concession issue

19. The original application lodged on 20 May 2026 also sought a variation to an existing concession (96118-SKI), as well as two new concessions. The variation has been described by the Applicant as a variation required for technical reasons to geographically remove the existing Rastus Burn Base Building from the existing Remarkables Concession so that it is solely provided for within the new Remarkables Base Concession.
20. On 3 July 2026, the Department of Conservation (DoC) wrote to the EPA querying whether a variation to an existing concession can be sought under section 42(4) of the Act.
21. Prior to any conclusion being reached on this question, and following discussion with the EPA, the Applicant advised on 7 July 2026 that while it did consider a variation was able to be sought under section 42(4), it nevertheless wished to amend the scope of its application to remove the variation. The Applicant confirmed the concession variation is a minor and technical matter that was included within the Application to ensure that there were no overlaps or competing provisions between the new Remarkables Base Concession, and the existing Remarkables Concession. The Applicant advises it will instead seek the variation to the concession via ordinary processes under the Conservation Act 1987. It therefore wishes to reduce the scope of the original application by removing the application for the variation to existing concession 96118-SKI.
22. Given the amendment to the application is minor and given it relates to a reduction in scope of the application, I consider that this change does not affect the consultation already conducted with relevant administering agencies under section 46(1). I am satisfied the Applicant is able to reduce the scope of the application as requested.

23. The Applicant has informally advised that a suite of updated application documents that remove references to the concession variation can be provided.

Section 43 Requirements

24. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

25. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
26. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
27. As set out in more detail in Paragraph 30 below and Appendix 2, Queenstown Lakes District Council (QLDC) and the Department of Conservation (DoC) have advised that the information required by section 44 is provided in **insufficient** detail to satisfy the purpose for which it is required. Central Otago Lakes District Council (CODC) and Otago Regional Council (ORC) have advised that the information required by section 44 is provided in sufficient detail. A request for further information was given to the applicant to counter some of the agencies concerns. This can be found in Appendix 3.
28. Following receipt of the further information, this memo now concludes that there is **sufficient** information that is required by section 44 to proceed.

Ineligibility

29. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
30. The list of ineligible projects includes activities:
- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
 - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
 - within an aquaculture settlement area without the required authorisation;

- activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
- that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
- That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
- That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
- That are undertaken for the purposes of an offshore renewable energy project.

31. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Notification by applicant

32. Pre-lodgement requirements for a listed project require the applicant to notify in writing the persons and groups referred to in section 29(1)(aa). The persons and groups notified have 20 working days to respond from the date of the notice. The applicant must not lodge their substantive application until each 20-working day period has elapsed.
33. I have checked and reviewed the dates of notification sent to the persons or groups in section 29(1)(aa) and confirmed that the application has lodged their application only after each 20-working day period has elapsed.

Fees and levies

34. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST;
 - Levy in the sum of \$140,000 plus GST; and

Consultation

35. I have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- ORC, CODC and QLDC for an approval described in section 42(4)(a) (resource consent)
 - The DoC for:
 - i. an approval described in section 42(4)(e) (concession)
 - ii. an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
 - iii. an approval described in section 42(4)(j) (complex freshwater fisheries activity approval);

36. A summary of the consultation is included as Appendix 2. Notable is that the consultation responses are also discussed in the Appendix 1 checklists, where relevant.

Requests for further information

37. I requested further information from the applicant under section 46(2A) on **4 June 2026** in relation to various matters. The applicant responded with the information on **1 July 2026** within the 20- working timeframe afforded by section 46(2B). A full copy of the request and response can be found in Appendix 3.

Assessment of compliance for each section of each application form

38. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
39. My view is that the application now complies with section 46 and the EPA may now notify the applicant of its decision.
40. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
41. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	Part A.10 - Substantive Application - Section 3 - Project Description. Pg. 97	As per Application reference. Part A.10 of the Application contains a detailed overview of the project, including maps and the timing of works. The Legal Overview (Part A.02) also contains a description of the activity.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	Part A.09 - Substantive Application - Section 2 - Environmental Setting. Pg. 24	Maps of the site can be found in Part A.09 as stated by the Applicant, along with Appendix A of the Legal Overview at Part A.02 and throughout various other documents. In relation to (i) Paragraph 120 of the Legal Overview at Part A.02 of the Application confirms that there are no statutory acknowledgements that directly affect the site under the Ngāi Tahu Claims Settlement Act 1998. Further information on the Ngāi Tahu Claims Settlement Act 1998 can be found in

			Section 2.5 of Part A.09 and in Part A.08 – Overview of the Ngāi Tahu Treaty Settlements. In relation to (ii) and (iii), the site is not within the rohe of o ngā hapū o Ngāti Porou and is not located in the coastal marine area so these information requirements are not relevant.
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.	Part A.15 - Substantive Application Section 8 Fast Track Approvals Act 2024 Requirements Pg. 290	Refer Part A.16 Page 300. Part A.15, as stated by the Applicant, also confirms compliance with Section 43. The project relates solely to a listed project as detailed in the body of this memorandum. All required fees and levies have been paid as detailed in the body of this memorandum.
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is	Part A.09 - Substantive Application - Section 2 - Environmental Setting. Pg. 28 Part I - Records of Title and Land Ownership	As per Application reference. Refer also to Part I.02 for adjacent owner details. Further information regarding ownership and leases can be found throughout the documentation. The site is unique with the Crown being the primary owner and NZSki holds various concessions (leases) and consents (as described in section Part I Section

	Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).		2, with copies of them provided in Part D) over parts of that land. There are no other leases that NZSki is aware of over the site. The other two “owners” of the site described in Part I (Signature Investments Limited and Southern Alpine Recreation Limited) have easements over the land, therefore are not “occupiers” per se and have been included in Part I as a precaution.
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	Part A.10 - Substantive Application - Section 3 - Project Description. Pg. 97	As per Application reference. This information is provided from Page 97 of Part A.10 and spans several pages.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	Part A.11 - Substantive Application - Section 4.2 - Approvals Required. Pg. 164 Part G.01 Rules Assessment	As per Application reference. Part A.11 provides an overview of all of the resource consent ‘triggers’ in the relevant regional and district plans in addition to the other approvals required under the Conservation Act, Wildlife Act and the Freshwater Fisheries Regulations.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	Part A.16 - Substantive Application Section 9.2.2-9.2.5 - Approvals Relating to Resource	As per Application reference.

		Management Act 1991. Pg. 303	
5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.	Part A.16 - Substantive Application - Section 9.3.1-22 Approvals Relating to the Resource Management Act 1991. Pg. 303	As per Application reference. Resource Management (Measuring and Reporting of Water Takes) Regulations 2010 is addressed at 9.3.2 on Page 306. National Environmental Standards for Freshwater is addressed at 9.3.3 on Page 307. National Environmental Standard for Air Quality is addressed at 9.3.4 on Page 309. National Environmental Standard for Assessing and Managing Contaminants in Soil is addressed at 9.3.5 on Page 310. National Environmental Standard for Sources of Human Drinking Water is addressed at 9.3.6 on Page 310. National Policy Statement for Freshwater Management is addressed at 9.3.8 from Page 311 onwards.

			National Policy Statement for Indigenous Biodiversity is addressed at 9.3.9 from Page 318 onwards. National Policy Statement for Natural Hazards 2025 is addressed at 9.3.10 from Page 325 onwards. The proposed Otago Regional Policy Statement (almost all appeals settled) is addressed at 9.3.11 from Page 327. The Otago Regional Plan: Water is addressed from 9.3.13 from Page 352. The Otago Regional Plan: Air is addressed at 9.3.14 from Page 365. The Queenstown Lakes Proposed District Plan (almost all appeals settled) is addressed at 9.3.15 from Page 367. The Central Otago District Plan is addressed at 9.3.17 from Page 937. The Kāi Tahu Ki Otago Natural Resource Management Plan 2005 is addressed at 9.3.18 from Page 408.
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			The Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 is addressed at 9.3.19 from Page 416.
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	Part A.16 - Substantive Application - Section 9.3.21 Approvals Relating to the Resource Management Act 1991. Pg. 429	As per Application reference.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o	N/A	N/A

	ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;		
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	Part H - Proposed Conditions H.01 Resource Consent Conditions	As per Application reference. Refer to Part H.01 and H.02 for the resource consent conditions specifically.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	Part E - Consultation and Engagement - E.02 Section 30 Notice from ORC	As per Application reference.
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg 189 Part A.14 - Substantive Application - Section 7	Refer response to Clause 6 below.

		- Assessment of Environmental Effects. Pg 273 Part A.16 - Substantive Application - Section 9.4.2 Approvals Relating to the Resource Management Act 1991. Pg. 433	
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg 189 Part A.16 - Substantive Application - Section 9.4.2 Approvals Relating to the Resource Management Act 1991. Pg. 433	Refer response to Clause 7 below.

6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to	Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg 189 Part A.14 - Substantive Application - Section 7 - Assessment of Environmental Effects. Pg 273 Part A.16 - Substantive Application - Section 9.4.2 Approvals Relating to the Resource Management Act 1991. Pg. 433	In relation to (a) as stated in the Application. Part A.13 includes an assessment of the following actual and potential effects: Positive effects, Cultural effects, Terrestrial ecology effects; Hydrology effects; Freshwater ecology and quality effects; Landscape and natural character effects; Wastewater effects; Electricity, Telecommunications and Water, Natural hazard effects; Transportation effects; Noise and vibration effects; Recreational effects; Archaeology and historic heritage effects. Note that there were issues raised by QLDC and DoC with regard to the sufficiency of the transportation assessment and ecology assessment respectively. DoCs concerns are discussed further in Checklist E. In response to concerns raised by QLDC, through the RFI process the Applicant has provided an addendum to the Integrated Transport Assessment (Part B-24A of the Application) which addresses QLDC's concerns regarding
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	the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		wider road network impacts. It appears that there is a technical difference of opinion between the QLDC and the Applicant that will need to be resolved at a further stage of the process. In relation to (b), the proposal does not involve the use of hazardous installations. In relation to (c) In relation to (d) Table 7-1 in Section 7 of Part A.14 provides a consolidated summary of adverse effects and details the proposed mitigation measures. In relation to (e) Part A.12 provides an overview of all consultation and engagement undertaken with organisations and persons that may be affected. A description is provided of how the views of various parties have been addressed. Section 5.5 recognises that comments will be sought from adjacent landowners. Part E of the Application provides more comprehensive records of consultation and engagement.
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			In relation to (f) Section 5.2 of Part A.12 provides an overview of consultation with mana whenua and does outline that a process agreement with Kā Rūnaka was terminated due to concerns around the ongoing cost of involvement in the process. In relation to (g) Part A.14 provides an overview of required monitoring and further information on monitoring is included throughout the corresponding technical reports. In relation to (h) there are no protected customary rights.
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg 189 Part A.16 - Substantive Application - Section 9.4.2 Approvals Relating to the	In relation to (a) the nature of the proposal means that information around effects on people in the neighbourhood is not applicable, however, the Part A.13 from Page 189 onwards does provide commentary on the positive economic and recreational/social effects in particular. Cultural effects are also addressed in Section 6.3 of Part A.13, Page 192.

	(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	Resource Management Act 1991. Pg. 433	In relation to (b) refer to Part A.13, Section 6.7, Page 230. In relation to (c) refer to Part A.13, Section 6.4, Page 194. In relation to (d) refer to Section 6.3 of Part A.13, Page 192. In relation to (e) The effects of the proposed discharges into the respective receiving environments are addressed in Part A.13 – Section 6.9.3.3 (groundwater effects) Page 253 and Section 6.9.4.4 surface water effects, Page 253-254, Section 6.9.3.5 Page 254 (freshwater ecology effects) (wastewater discharge), and Section 6.6.7 Page 226 (stormwater discharge). The alternative methods of discharge (for wastewater and stormwater discharges) are in Part A.16 - Section 9.4.2, Page 433-435). The various options considered for the wastewater treatment before discharge is also contained within Part A.10 Section 3.8.3, Page. 155-156 (project description with the various potential treatment options outlined).
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			In relation to (f) refer to Part A.13, Section 6.12, Page 267. In relation to (g) there are no hazardous installations proposed.
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	Part G.01 Rules Assessment	As per Application reference.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	N/A	N/A
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is	N/A	N/A

	subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.		
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CHECKLIST D1 – Concession

Clause, Schedule 6	Information required for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6	Application Reference (Name of document, section and page)	EPA
3(1)(a)	A description of the proposed activity	Part A.10 - Substantive Application - Section 3 - Project Description. Pg. 97	Through consultation DoC raised the issue that “A description is not provided of the proposed activity in the lands to the north of the proposed infrastructure developments (i.e. the 2 northern ‘sub-basins’ within the green dotted line of the “Doolans Expansion Area Boundary” - see excerpt from map C00 E103 below). These have no proposed infrastructure, trails or obvious access from the proposed developments.” This matter was included in the RFI, and the Applicant has subsequently provided a fulsome description of the proposal with respect to this

			location on Pages 3 and 4 of the RFI response (refer Appendix 3A to this memo).
3(1)(b)	A description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places)	Part A.10 - Substantive Application - Section 3 - Project Description. Pg. 97 Part A. 09 - Substantive Application - Section 2 - Environmental Setting. Pg 22 Part H - Conditions - H.08 Concessions Co-ordinates	As per application reference and confirmed by DoC.
3(1)(c)	Information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less	Part A.17 - Substantive Application - Section 10.1 -Approvals Relating to the Conservation Act. Pg.437	As per application reference and confirmed by DoC.
3(1)(d)	In the case of an application for: a concession that would otherwise be applied for under the Conservation Act 1987,	Part A.17 - Substantive Application - Section 10.2 -Approvals Relating to the	DoC does not consider the information to have been provided in sufficient detail, commenting that information is not provided about the extent to which the concession is consistent with Provision 3.10 of the Otago Conservation

	section 14AA of the Wildlife Act 1953, or section 49 of the National Parks Act 1980; or • a concession as defined in section 2(1) of the Reserves Act 1977 that would otherwise be applied for under section 59A of that Act; information about the extent to which the project is consistent with: (i) the relevant conservation management strategy and conservation management plan; (ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity.	Conservation Act. Pg. 450	Management Strategy (the CMS). This provision stipulates that when considering an application to erect, retain or re-use structures or utilities [abridged], consideration is given to the outcomes and policies for the Places where the activity is supposed to occur. DoC does not consider that consideration has been given to the outcomes for the Western Lakes and Mountains Place (refer Section 2.4 of the CMS) that “Prominent landscape and geological features (ridgelines, and mountain tops) remain in their natural state, or are unmodified beyond their state at the time of becoming public conservation lands and waters)”. I have considered the comments of DoC, and determined that no further information was required in relation to this matter for the following reasons: • On review of the Otago CMS, the outcome stated forms part of a fulsome page long explanatory outcome statement for the Western Lakes and Mountains Place, which proceeds the policy statements for this area, and needs to be considered in this context. The Application, from Page 451 of Part A.17 onwards, provides a
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			comprehensive assessment of the CMS, including (from Page 158) consideration of the Western Lakes and Mountains outcome, followed by consideration of the key policy statements. • This information requirement does not ask for the Application to address all compliance with all relevant provisions individually, but rather, provide information about the extent to which the Application is consistent with the CMS overall. DoC has also commented that information about the extent to which the project is consistent with Ski-fields Policy 3.25 of the CMS is insufficient. Policy 3.25.2 (abbreviated) states that in considering the development of new and existing authorised ski fields apply a precautionary approach to the approval of new structures, accommodation facilities and terrain modification and consider.....the likely longevity of the field in the face of climate change..... DoC considers that although the application acknowledges climate change and how the Doolans proposal is able to improve the resilience and extend the longevity of the ski area
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			generally, due to its south facing aspect; this appears to assume that the Doolans Basin itself is not also affected by climate change. Insufficient information has been provided about how the Project, including new developments proposed in the Doolans Basin itself is consistent with a precautionary approach to developing a ski area in the face of climate change, noting the 40-year term sought. Climate change data and assessment supporting an expansion into the Doolans for the purpose of operating a ski area over the proposed term of the next 40 years, in the face of climate change, is absent. I requested information on this matter in the RFI, and subsequently the Applicant has provided a response from Page 6 of the RFI (Appendix 3A of this memo), and a further memorandum on the climate change resilience of the project and research that has informed this (Appendix 3D of this memo). I now consider that the information required has been provided in sufficient detail.
3(1)(e)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, information about the extent to which the	N/A	N/A

	project is consistent with any management plan approved under section 41 of the Reserves Act 1977		
3(1)(f)	Information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration	Part A.17 - Substantive Application - Section 10.2 -Approvals Relating to the Conservation Act. Pg. 438	Through consultation DoC raised the issue that there was not sufficient information about the extent to which the project (for those parts in the Doolans Basin) is in keeping with the conservation purpose for which it is held, noting the definition of conservation and relevant terms such as preservation and protection. This matter was included in the RFI, and in response the Applicant has provided a response on Pages 4 and 5 of the RFI response (Appendix 3A to this memo). The Applicant largely relies on that the project provides for preservation and protection “as far as practicable”. I consider this response sufficient for the purposes of this completeness assessment.
3(1)(g)(i)	A description of the potential effects (positive and negative) of the proposed activity	Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg. 189 Part A.17 - Substantive Application - Section 10.2 -Approvals	Through consultation DoC raised issue that several potential effects had not been addressed I sufficient detail, as follows: <i>“Climate Change: Potential effects on the land and its conservation values should climate change make the activity unviable in the future have not been sufficiently assessed, leaving</i>

		Relating to the Conservation Act. Pg. 439	<i>uncertainty around the project's feasibility and potential adverse effects.</i> <i>Heritage: [refer DoC comments at Point 4 of Appendix 2 of this memorandum].</i> <i>Vegetation and related ecosystems: [refer DoC comments at Point 4 of Appendix 2 of this memorandum].</i> <i>Invertebrates: [refer DoC comments at Point 4 of Appendix 2 of this memorandum].</i> <i>Avifauna: [refer DoC comments at Point 4 of Appendix 2 of this memorandum]."</i> Except for issues raised around Heritage, further information was requested in relation to DoC's concerns. The Applicant has responded to these matters from Page 8 of the RFI response (Appendix 3A to this memo) and has provided separate ecology and climate change technical responses (Appendix 3C and 3B to this memo). I now consider the effects to have been addressed in sufficient detail but note that there is likely to be technical differences of opinion between the Applicant and DoC that will need to be resolved at later stages of the process.
3(1)(g)(ii)	A description of any actions that the applicant proposes to take to avoid remedy, mitigate,	Part A.13 - Substantive Application - Section 6	As per application reference, with particular reference to Table 7-1 in Section 7 of Part A.14

	offset or compensate for any adverse effects of the proposed activity	- Assessment of Environmental Effects. Pg. 189 Part A.14 Substantive Application - Section 7 - Management and Monitoring of Actual and Potential Effects. Pg. 273 Part A.17 - Substantive Application - Section 10.2 -Approvals Relating to the Conservation Act. Pg. 438	provides a consolidated summary of adverse effects and details the proposed mitigation measures.
3(1)(g)(iii)	A description of details of the type of concession for which the applicant is applying	A.11 Substantive Application - Section 4.3 Approvals Required p174 Part A.17 - Substantive Application - Section 10.1 - Approvals Relating to the Conservation Act. Pg. 437	Refer to Part A.11, Page 174.

		Part H Conditions - H.03 to H.05	
3(1)(h)	A statement of the proposed duration of the concession and the reasons for the proposed duration	Part A.17 - Substantive Application - Section 10.1 - Approvals Relating to the Conservation Act. Pg 440	Refer Part A.11, Section 4.3 – Approvals sought under the FTAA – Conservation Act 1987 Page174. Also refer Part A.17, Section 10.1 - Approvals Relating to the Conservation Act – Concessions under the Conservation Act Page 440
3(1)(i)	Relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence or has any current criminal charges pending before a court)	Part A.17 - Substantive Application - Section 10.1 - Approvals Relating to the Conservation Act. Pg 440	Part A.17, Page 440.
3(1)(j)	If applying for a lease, a licence granting an interest in land, or an easement, (i) reasons for the request; and (ii) sufficient information to satisfy the panel that, in terms of clause 7 (criteria for assessment of application for concession), it is appropriate under section 81(decisions on approvals	Part A.17 - Substantive Application - Section 10.1 - Approvals Relating to the Conservation Act. Pg. P 440 Part A.17 - Substantive Application - Section 10.3 - Decision making	As per application references and note DoC has confirmed this.

	sought in substantive application) to grant the lease, licence, or easement (as the case may be)	considerations for Concessions P476	
3(1)(k)	Full details of any consultation undertaken with relevant iwi and with reserve owners and managers	Part A.12 - Substantive Application - Section 5.2 - Consultation and Engagement. Pg. 181	As per application reference, refer to Part A.12 Pag 186. Note that DoC has confirmed consultation has occurred.
3(1)(l)	Information about financial and legal liabilities and obligations associated with the land	Part A.17 - Substantive Application - Section 10.1 - Approvals Relating to the Conservation Act. Pg. P 441	As per application reference and confirmed by DoC.
3(1)(m)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve	N/A	N/A
3(1)(n)	Confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that	N/A	

	right for the purposes of any lease proposed in the application if— (i) the proposed lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (ii) the granting of the lease would trigger the right of first refusal or right of offer or return.		
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CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	Part A.10 - Substantive Application - Section 3 Project Description. Pg. 97 Part A.11 - Substantive	As per Application reference and confirmed by DoC, but refer also to Part A.18A – Substantive Application – Section 11 Approvals relating to Wildlife Act.

		Application - Section 11.1 Approvals relating to Wildlife Act 1953 P478	
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)	Part A.10 - Substantive Application - Section 3 Project Description. Pg. 97. Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg. 189 Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P478	As per Application reference and confirmed by DoC. Refer also to Part A.18A, Page 478.
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	Part A.18 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P479 Part A.13 - Substantive	As per the Application reference but refer also to Part A.18A, Page 479. Confirmed also by DoC.

		Application - Section 6 - Assessment of Environmental Effects. Pg. 189	
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P482	Refer Part A.18 Page 482, reference confirmed by DoC.
2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P482	Refer Part A.18A section 11.1, Page 482. Reference confirmed by DoC.
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P483 Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg. 189	Through the consultation process, DoC raised concerns that there was insufficient information regarding the following: “Avifauna - Information to ensure best practice standards are met is not sufficient. For example, information on how methods for relocation of nests ensures best practice is not provided; including examples of where this has successfully occurred for this or similar species.

		Part B.12 Terrestrial Ecology Impact Assessment - Table 18, Pg. 137. Part B.13 Lizard Assessment and Management Plan. Section 4.4-4.7. Pg. 23	Lizards - Information to ensure best practice standards are met is not sufficient. This includes why salvage (mitigation) is not being proposed ahead of compensation; which is not best practice. The methods do not state how best practice standards are met.” Information was requested on these matters through the RFI process, and a further technical addendum that directly responds to these matters was provided, which is included as Appendix 3C to this memo. The technical addendum addresses DoC’s concern from Page 5, providing an explanation as to why certain best practise standards are not fit for purpose for the proposal. I am now satisfied that the information requirement has been addressed in sufficient detail but note there may be technical differences of opinion between DoC and the Applicant that need resolved at later stages of the process.
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P484 Part B.12 Terrestrial Ecology Impact	Through the consultation process, DoC raised concerns with the insufficiency of information regarding methods for destruction of avi-fauna nests. Information was requested on this matter through the RFI process, and a further technical addendum that directly responds to these matters was provided, which is included as Appendix 3C to this memo. The technical

		Assessment - Table 18, Pg. 137. Part B.13 Lizard Assessment and Management Plan. Section 4.4-4.7. Pg. 23	ecology memo addresses this matter from Page 7, and provides details of additional surveys, exclusion areas, and a process for nest disturbance/destruction. I am now satisfied that the information requirement has been addressed in sufficient detail but note there may be technical differences of opinion between DoC and the Applicant that need resolved at later stages of the process.
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P484 Part B.12 Terrestrial Ecology Impact Assessment - Table 18, Pg. 137. Part B.13 Lizard Assessment and Management Plan. Section 4.4-4.7. Pg. 23 Part H Conditions - H.06 Wildlife Approvals Avifauna and H.07	Through the consultation process, DoC raised concerns regarding insufficient information about wildlife relocation areas. Information was requested on this matter through the RFI process, and a further technical addendum that directly responds to these matters was provided, which is included as Appendix 3C to this memo. The technical ecology memo addresses this matter from Page 7, and provides details of exclusion areas, and a preference for relocation in the immediate vicinity not more than a few meters. I am now satisfied that the information requirement has been addressed in sufficient detail but note there may be technical differences of opinion between DoC and the Applicant that need resolved at later stages of the process.

		Wildlife Approval Lizards	
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P486	Refer to Part A.18, Section 11.1. Confirmed also by DoC.
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P486 Part A.13 - Substantive Application - Section 6.4 - Assessment of Environmental Effects - Pg. 194 Part B.12 Terrestrial Ecology Impact Assessment - Section 6 - Pg. 120. Part B.13 Lizard Assessment and	As per Application reference and confirmed by DoC, but specifically refer to Part A.13 Assessment of Environmental effects, Part B.12 TEIA, Part B.13 Lizard assessment and management plan.

		Management Plan. Section 3 Pg. 20	
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Part A.11 - Substantive Application - Section 11.1 Approvals relating to Wildlife Act 1953 P486 Part A.13 - Substantive Application - Section 6.4 - Assessment of Environmental Effects - Pg. 194 Part A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects - pg. 273 Refer to Part H - Proposed Conditions	As per Application reference, but refer to Part A.13 Assessment of Environmental effects, Part A.14 s7, and Part H – Proposed Conditions in particular. Confirmed also by DoC.
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application	Part A.18 - Substantive Application - Section 11.1 Approvals relating	As per Application reference and confirmed by DoC.

	has been convicted of any offence under the Wildlife Act	to Wildlife Act 1953 P487	
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Part A.18 - Substantive Application Report - Section 11.1 - Approvals Relating to Wildlife Act 1953. Pg. 487	As per Application reference and confirmed by DoC.
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	Part A.12 - Substantive Application - Section 5 - Consultation and Engagement. Pg. 181	As per Application reference.
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	Part A.18 - Substantive Application Report - Section 11.1 - Approvals Relating to Wildlife Act 1953. Pg. 488. Part B.12 Terrestrial Ecology Impact Assessment Part B.13 Lizard Assessment and	As per Application reference and confirmed by DoC but refer to Part A.18, Part B.12 TEIA, Part B.13, and Part B.30 Ecology Memo in particular.

		Management Plan Part B.30 Ecology Memo	
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CHECKLIST G – Complex freshwater fisheries approval

Clause, Schedule 9	Information required for an approval described in section 42(4)(j) (complex freshwater fisheries approval), clause 3 of Schedule 9	Application Reference	EPA
3(a)	in relation to the structure and any fish facility: (i) a description of the type of structure or fish facility: (ii) the dimensions of the structure or fish facility: (iii) the design of the structure or fish facility: (iv) the placement of the structure or fish facility: (v) the water flows: (vi) the operating regime	Part A.19 - Substantive Application - Section 12 - Approvals Relating to Complex Freshwater Fisheries Activities - Pg. 498 Part C - Project Maps and Plans. Refer to Part H - Proposed Conditions (final design of instream structures to be provided to the Consent Authority). Refer to Part B.08	As per Application reference and confirmed by DoC.

		Water Take Assessment of Effects, B.09 Freshwater Ecological Impact Assessment, B.14 Hydrological Impact Assessment, B.16 Stormwater Concept, B.20 Reservoir Concept, B.21 Water Intake Concept Report.	
3(b)	the freshwater species and values present (with particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System)	N/A - No fish present in the locations where structures are proposed.	As per Application reference and confirmed by DoC.
3(c)	the water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream)	Part A.09 - Substantive Application - Section 2.8 - Environmental Setting - Pg. 50. Part A.19 - Substantive Application - Section	As per Application reference and confirmed by DoC.

		12 - Approvals Relating to Complex Freshwater Fisheries Activities - Pg. 492	
3(d)	how the passage of fish will be provided for or impeded	N/A - The structures are not a barrier to fish as there are none present. Part A.19 - Substantive Application - Section 12 - Approvals Relating to Complex Freshwater Fisheries Activities - Pg. 492	N/A

CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA
13(4)(a)	a description of the project and the activities it involves	Part A.10 - Substantive Application - Section 3 Project Description. Pg. 97. A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As stated in the Application. Part A.10 of the Application contains a detailed overview of the project, including maps and the timing of works. The Legal Overview (Part A.02) also contains a description of the activity.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	Part A.15 - Substantive Application - Section 8.6 - Fast-Track Approvals Act 2024 Requirements - Pg. 298 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per Application reference.

13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	Part A.10 Substantive Application - Section 3 Project Description, Pg. 99 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per Application reference.
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	Part A.10 - Substantive Application - Section 3.3 - Project Description - Pg. 101 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per Application reference.
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	Part A.10 - Substantive Application - Section 3.3 - Project Description - Pg. 101 A.15 Substantive Application - Section 8 Fast Track Approvals	As per Application reference. The Construction Overview in Section 3.3 provides a comprehensive overview of staging, with Table 3-1 showing staging by season.

		Act 2024 Requirements - P.290	
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects	Part A.13 - Substantive Application - Section 6 - Assessment of Environmental Effects. Pg. 189 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per Application reference. Refer also to response for Clauses 6 and 7 of Checklist A.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	Part A.11 - Substantive Application - Section 4.2 - Approvals Required. Pg. 164 Part G.01 Rules Assessment A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per Application reference, however, on review of these sections, there does not appear to be any prohibited activities.
13(4)(j)	a list of the persons and groups the applicant considers are likely to be affected by the project, including—	Part A.12 - Substantive Application - Section 5 -	As per Application reference.

	(i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:	Consultation and Engagement - Pg. 181 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	
13(4)(k)	a summary of— (i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	Part A.12 - Substantive Application - Section 5 - Consultation and Engagement - Pg. 181 A.15 Substantive Application - Section 8 Fast Track Approvals	As per application reference. Refer to Part A.12 for the summary of consultation undertaken with groups identified in Section 29 / 11(1) of the Act and refer to summaries provided in Parts E.03, E.04, E.05 and E.05.

		Act 2024 Requirements - P.290	
13(4)(ka)	a summary of how any responses provided to the notification under section 29(1)(aa) have informed the project	Part A.12 - Substantive Application - Section 5 - Consultation and Engagement - Pg. 181 Refer to Part E - Consultation and Engagement A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per application reference. For information about how consultation under 29(1) has informed the project, refer to summaries provided in Parts E.03, E.04, E.05 and E.05.
13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	Part A.16 - Substantive Application Report - Section 9 - Approvals Relating to RMA- Pg. 429 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	Part A.16 - Substantive Application Report - Section 9 - Approvals Relating to RMA- Pg. 429 and Part B.02 Overview of Ngai Tahu Treaty Settlements.

13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	N/A	
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	N/A	
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	N/A	
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	Part A.02 - Substantive Application Report - Section 2.5 - Environmental Setting - Pg. 43 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	This information requirement is not applicable as Section 23 of the Act relates to a determination around linear infrastructure for the purpose of the construction of electricity lines or land transport infrastructure. The Application is not for either of these activities.
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— (i) the scale and adverse effects of the existing electricity infrastructure; and (ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result	N/A	

	of the maintenance, upgrading, or continued operation of the infrastructure		
13(4)(r)	a statement of whether the applicant is seeking a determination under section 24(4) and, if so,— [content removed for brevity]	N/A	
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	Part A.09 - Substantive Application - Section 2.3 - Environmental Setting - Pg.29 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	Refer Part A.09, Page 28 onwards which details the land ownership and leases, exiting authorisations and approvals for the site.
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	A.11 Substantive Application - Section 4.3 Approvals Required. Pg. 164 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	Refer Part A.09, Page 28 onwards which details the land ownership and leases, exiting authorisations and approvals for the site. Refer also to Part A.08, Section 1.2.2 onwards from Page 3.

13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:	Part A.09 - Substantive Application - Section 2.3 - Environmental Setting - Pg. 29 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	Refer Part A.09 - Section 2.3.1 from Page 29 onwards and Section 2.3.2 from Page 33 onwards, and Section 2.3.3 from Page 34 onwards.
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	Part A.13 - Substantive Application - Section 6.10 - Assessment of Environmental Effects - Pg. 256 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per the Application reference.
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	N/A	

13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	Part A.15 - Substantive Application - Fast-Track Approvals Act 2024 Requirements - Section 8.4 - Pg. 294 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per Application reference. Refer to Page 294 specifically, near the end of the page.
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	Resource consent or designation (a) an assessment of the project against— (i) any relevant national policy statement; and (ii) any relevant national environmental standards; and (iii) if relevant, the New Zealand Coastal Policy Statement; and	Part A.16 - Substantive Application - Section 9.3.1-9.3.22 - Approvals Relating to RMA 1991 - Pg. 305. A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290	As per Application reference. Resource Management (Measuring and Reporting of Water Takes) Regulations 2010 is addressed at 9.3.2 on Page 306. National Environmental Standards for Freshwater is addressed at 9.3.3 on Page 307. National Environmental Standard for Air Quality is addressed at 9.3.4 on Page 309.

			National Environmental Standard for Assessing and Managing Contaminants in Soil is addressed at 9.3.5 on Page 310. National Environmental Standard for Sources of Human Drinking Water is addressed at 9.3.6 on Page 310. National Policy Statement for Freshwater Management is addressed at 9.3.8 from Page 311 onwards. National Policy Statement for Indigenous Biodiversity is addressed at 9.3.9 from Page 318 onwards. National Policy Statement for Natural Hazards 2025 is addressed at 9.3.10 from Page 325 onwards.
	(b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).	N/A	

13(4)(y)(ii), clause 3 of Schedule 5	Change or cancellation of resource consent condition The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.	N/A	
13(4)(y)(iii), clause 4 of Schedule 5	Certificate of compliance The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.	N/A	
13(4)(y)(iv), clause 2 of Schedule 6	Concession (1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and— (a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (b) the granting of the lease would trigger a right of first refusal or a right of offer or return.	N/A - Lease is proposed for 40 years.	

	(2) Confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.		
13(4)(y)(v), clause 23 of Schedule 6	Land exchange (1) The information required to be provided under section 13(4)(y)(v) is (a) - (e) below: (a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:	N/A	
	(b) the financial value of the land proposed to be acquired by the Crown:	N/A	
	(c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate: <i>Guidance note: This must include an explanation of why the exchange would benefit the conservation estate; and details of anything registered or noted for conservation purposes on the record of title for the land to be acquired by the Crown (clause 23(1A) of Schedule 6)</i>	N/A	

	(d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:	N/A	
	(e) confirmation by the applicant that no part of any land to be exchanged by the Crown is – (i) land listed in Schedule 4; or (ii) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977	N/A	
13(4)(y)(vi), clause 4A of Schedule 5	Standard freshwater fisheries activity approval (4A) The information required to be provided under section 13(4)(y)(vi) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which the proposed structure may impede fish passage; and (b) whether any fish salvage activities are proposed.	N/A	

13(4)(y)(via), clause 2 of Schedule 9	Complex freshwater fisheries activity approval (2) The information required to be provided under section 13(4)(y)(via) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and (b) whether any other complex freshwater fisheries activities are proposed.	Part A.10 - Substantive Application - Section 3 - Project Description - Pg. 97 A.15 Substantive Application - Section 8 Fast Track Approvals Act 2024 Requirements - P.290 Part A.19 - Substantive Application - Section 12 - Approvals relating to freshwater fisheries Pg.492 Note there are no fish located at the elevations of the Project.	As per application reference. Part A.19 of the Application confirms that while several instream structures are proposed, there are no fish present in the waterbodies where the structures are proposed due to the altitude of the project.
13(4)(y)(vii), clause 2 of Schedule 10	Marine consent (1) The information required to be provided under section 13(4)(y)(vii) is– (a) information about whether the Minister of Conservation is an affected person:	N/A	
	(b) additional information about whether the applicant has already made an application for a	N/A	

	consent under the EEZ Act in relation to the project, and, if so,— (i) details of any application made; and (ii) the decisions made on that application; and (iii) information about the matters that the Minister may consider under section 22(6):		
	(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.	N/A	
13(4)(y)(viii), clause 2 of Schedule 11	Access arrangement (1) Confirmation that the applicant has complied with section 29 (for the purposes of section 13(4)(y)(viii)).	N/A	
13(4)(y)(ix), clause 15 of Schedule 11	Mining permit [Content removed for brevity]	N/A	
43(2)(b)	if the project is planned to proceed in stages,— (i) an outline of the nature and timing of the stages; and	Part A.10 - Substantive Application - Section 3 - Project Description. Pg. 97 A.15 Substantive Application - Section 8	Section 3.3 in Part A.10 from Page 101. It is evident from that information that there will not be a substantive application lodged for each stage, but

	(ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and (iii) an explanation of how each stage meets the criteria in section 22:	Fast Track Approvals Act 2024 Requirements - P.290	that the current application covers all the stages.
43(2)(c)	the information that the applicant provided to the Minister when applying to have the project listed as a listed project and an explanation of how the substantive application is within the scope of the listed project.	A.15 Substantive Application - Section 8.4 Fast Track Approvals Act 2024 Requirements - P.296 Part K.01 Schedule 2 Listing Documentation	As per Application reference.

Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

Appendix 2A - Consultation with Otago Regional Council as one of the relevant consent authorities for the resource consent (section 42(4)(a) of the Act):



Otago Regional Council
70 Stafford Street
Dunedin 9054

29 May 2026

Steph Bougen
Application Lead, Fast-Track Applications FTAA- 2605-1236
Uploaded via Fast-Track Portal

Otago Regional Council has received correspondence dated 22 May 2026 from the EPA regarding a completeness and scope assessment prior to referral of a substantive application by NZSki Limited for the Remarkables Ski Area Upgrade and Doolans Expansion to an Expert Panel under the Fast-track Approvals Act 2024 (the Act).

Substantive Application Assessment

To inform the EPA's completeness assessment of the application, the EPA asked whether the documentation available in the application portal regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

A review shows that the application documentation available in the EPA application portal meets the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Section 30 Confirmation

The EPA also asked the following specific question in accordance with section 30 of the Act:

Confirm that the written notice prepared by the Council remains accurate and final at the time of receiving this letter.

I confirm that the letter dated 30 October 2025 regarding Section 30(3)b remains accurate and final.

Yours sincerely,



Alexandra King
Manager Consents/Manager Environmental Delivery Data and Systems

Appendix 2B - Consultation with Central Otago District Council as one of the relevant consent authorities for the resource consent (section 42(4)(a) of the Act):



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand
03 440 0056
Info@codc.govt.nz
www.codc.govt.nz





FTAA-2605-1236 – CODC COMPLETENESS CHECK
SECTION 46 OF THE FAST TRACK APPROVALS ACT 2025.

Project Name	Remarkables Ski Area Upgrade and Doolans Expansion
Applicant	NZSki Limited
Project Number	FTAA-2605-1236
Consents sought	RMA consents sought under the Central Otago District Plan
Date due to EPA	29 May 2026

On 22 May 2026, Central Otago District Council (CODC) received a request from the EPA seeking its views on whether the application FTAA-2605-1236 meets the requirements of sections 42 and 43 of the Fast-track Approvals Act 2024 (the Act) and whether the information is in sufficient detail to satisfy section 44 of the Act.

The purpose of this document is to provide advice to assist the EPA in making its decision whether the application FTAA-2605-1236 complies with the requirements of section 46 of the Act.

The advice covers compliance with the following:

- Information requirements for approvals relevant to CODC; and
- Consultation requirements;
- Existing resource consent on the site – RC140059.

It is emphasised that this check does not confirm the accuracy or robustness of the information submitted with the substantive application. CODC understands and supports that this document will be passed on to the applicant, the Panel Convener and the Panel.

Compliance with information requirements

In summary, CODC advises that, in terms of the relevant CODC matters, the application generally meets all requirements set out in sections 42-44 of the Act and can be deemed complete under section 46 of the Act.

However, there are several matters which CODC considers missing from the application which should be addressed to enable a full understanding of the proposal, its impacts and how these impacts will be managed. A summary of these is listed in Table A. Where information is identified Table A, it is assessed on the basis that the absence of this information at this stage of the process is unlikely to have significant implications and should not impact on the progression of the application to the next stage of the process. As such, CODC suggests that any information gaps identified in Table A could be resolved

through engagement with the applicant or further information provided. It also should be noted that the matters raised in Table A do not constitute a full list of information gaps or non-acceptance of the information included in the application, but are key matters CODC considers the applicant should consider at this early stage of the formal process, and may be useful for the Panel Convenor when considering timings and steps. The matters listed do not include feedback already provided to the applicant during the pre-lodgment engagement process.

Existing Resource Consent

For the EPA's convenience the known resource consent on the subject site is attached as Attachment B.

Consultation

Section 29(1)(a) of the Act requires that, before lodging a substantive application for a listed project, the authorised person for the project must notify in writing the persons and groups referred to in section 11(1)(b) and give them 20 working days to respond to the notice. CODC is a relevant local authority for FTAA-2605-1236 in terms of section 11(1)(b) and was notified in terms of section 29(1)(a).

Whilst CODC acknowledges that the applicant no longer is required to consult with CODC prior to lodging the application, CODC was supportive of opportunities to understand the project and provide feedback. CODC agreed with the applicant a process by which this would occur, including committing to short turnaround for comments on draft reports. The goal was to understand information gaps, methodology concerns, mitigation appropriateness and to resolve or at least narrow issues raised by CODC or its experts.

In terms of Schedule 5 Cl 6(1)(e), CODC agrees with the applicant's assessment of consultation with CODC at 5.3.4 of A.12 – Section 5 of the substantive application, insofar as that consultation has occurred through one meeting, two ecology technical briefings, opportunities to visit the site and the provision of some draft technical documents for comment since the applicant first signaled its intention to make an application under the FTTA legislation in February 2026. It is not correct that the applicant was awaiting feedback regarding the Terrestrial Ecology and Natural Hazard Assessments at the time of lodgment. That feedback was provided to the applicant on 13 and 14 May respectively, which was within the mutually agreed 10 working day turnaround for comments. Peer review on the Economic Assessment has commenced, but was delayed due to the applicant raising doubts about the necessity of the peer review and initially advising CODC they would not pay for such work. The position has now changed and a full peer review is underway, although it is preferable that the matters raised regarding the Economic Assessment (refer Table A) be responded to by the applicant prior to the peer review continuing to avoid substantial rework.

With respect to the 3 Waters reports, those reports were provided by the applicant on 13 May but not peer reviewed by CODC as the applicant again advised CODC that such a peer review would not be paid for as they did not consider such a peer review necessary.

CODC was not provided with draft substantive application, rule assessment, conditions, noise assessment, construction management framework, erosion and sediment control assessment, construction environmental management plan, terrestrial ecology management plan, lizard

report and management plan or other management plans to review prior to lodgment.

In addition, there has been limited opportunity for an exchange of views between CODC experts and NZSki experts to determine areas of agreement or disagreement. Site visits for CODC experts were undertaken prior to the technical documents being available (other than in relation to landscape) and no follow up workshops or meetings have been arranged to date. CODC has offered to the applicant to make its experts available as is useful on several occasions. That offer remains and CODC looks forward to ongoing discussions with NZSki throughout this process.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Fiona Garrett'.

Fiona Garrett
Planning Manager

Enclosed

Table A: Summary of Information Gaps

RC140059 – Totally Tourism Limited Decision

Appendix 2C - Consultation with Queenstown Lakes District Council as one of the relevant consent authorities for the resource consent (section 42(4)(a) of the Act):



QUEENSTOWN
LAKES DISTRICT
COUNCIL

Private Bag 50072, Queenstown 9348, New Zealand
QUEENSTOWN, 10 Gorge Road | P: +64 3 441 0499
WANAKA, 47 Ardmore Street | P: +64 3 443 0024
www.qldc.govt.nz

28 May 2026

Steph Bougen, Application Lead
Fast-Track Applications
Via email to info@fasttrack.govt.nz. Our ref: FTAA Doolans NZ Ski

Tēnā koe Steph,

Section 46 Completeness Check: NZSKI Limited Remarkables Ski Area Upgrades and Doolans Expansion Project

Queenstown Lakes District Council (QLDC, The Council) has reviewed the submitted application material as it relates to the extent of the application within its jurisdiction, noting the cross-territorial authority boundary nature of the application.

QLDC considers the application may not pass the completeness test for the reason set out in this letter.

Fast-track Approvals Act 2024 (FTAA) Schedule 5 Clause 6

FTAA Section 42(3)(2)(a) requires an application for a resource consent to provide the information requirements set out in clauses 5-9 of Schedule 5. Schedule 5 Clause 6 requires the assessment of an activity's effect on the environment, including any actual and potential effects of the activity.

QLDC acknowledges that this application seeks to expand an existing ski field through efficiently utilising existing ski field infrastructure to expand into the Doolans Basin (located within Central Otago District Council boundaries).

All access by staff and people using this new ski field area will be via the existing ski field road off state highway 6 (within the QLDC area). This will result in additional ski field traffic accessing and using the state highway and local road networks because the expansion will allow a greater number of people on the ski field on any given day.

The traffic assessment supporting the application and the Assessment of Environmental Effects does not undertake a full assessment of wider transport network impacts and performance in relation to additional demand on State Highway 6, in particular the highway in both directions from the ski field access road, and the Frankton Road/State Highway 6 intersection. Rather, it narrowly focusses on the intersection upgrade of the ski field access road and State Highway 6.

QLDC has previously raised this in discussions with the applicant, however this is not covered in the consultation and engagement summary attached as Part E to the application.

QLDC considers that it is important that decision-makers are appraised with a full understanding of the effects of the proposal from additional traffic generation on the transport network.

QLDC considers that the application otherwise meets the requirements of Section 42 and 43.

Yours sincerely, Nāku noa nā,



Opur Oktem Lewis

Programme Manager, FTAA

Appendix 2D - Consultation with the Department of Conservation as the administering agency for the following:

- Concession that would otherwise be applied for under the Conservation Act 1987 (section 42(4)(e) of the Act)
- An approval, a dispensation, or an authorisation under the Freshwater Fisheries Regulations 1983 or the Conservation Act 1987 in respect of a complex freshwater fisheries activity (section 42(4)(j) of the Act)
- A wildlife approval as defined in clause 1 of schedule 7 of the Act (section 42(4)(h) of the Act)

For Appendix 2D – refer separate document.

Appendix 3: Further information request

Request for Further Information 1:

- Date sent: 4 June 2026
- Topic: Transport, Ecology, Climate Change and other.
- Date of response: 1 July 2026



FTAA-2605-1236

4 June 2026

Kirsty O'Sullivan
Mitchell Daysh limited
By Email: kirsty.OSullivan@mitchelldaysh.co.nz

Tēnā koe,

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

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

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

Request for Further Information

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

Resource Consent – Schedule 5 information requirements

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

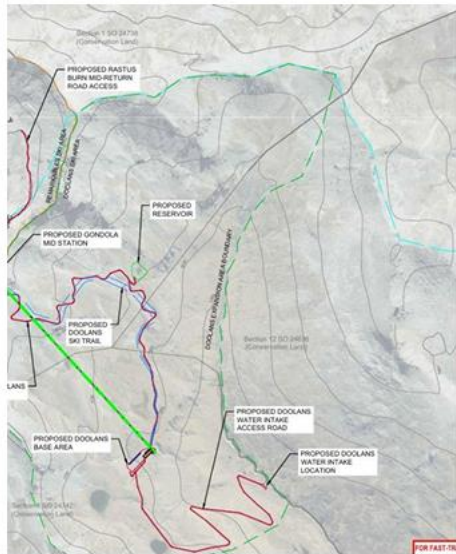
"The traffic assessment supporting the application and the Assessment of Environmental Effects does not undertake a full assessment of wider transport network impacts and performance in relation to additional demand on State Highway 6, in particular the highway in both directions from the ski field access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

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

Concession - Schedule 6 information requirements

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

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



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

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

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

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

“Vegetation and related ecosystems:

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

Invertebrates

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

Avifauna

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

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

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

Wildlife Act Authority – Schedule 7 information requirements

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

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

Avifauna

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

Lizards

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

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

Avifauna

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

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

Avifauna

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

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

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

Responding to the Request for Further Information

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

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

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

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

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

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

Nāku noa, nā



Ben Bond

Team Leader, Fast-track Applications

Appendix 3A: Further information response (Overview)

Refer separate document

Appendix 3B: Further information response (Transport)

Refer separate document

Appendix 3C: Further information response (Ecology)

Refer separate document

Appendix 3D: Further information response (Climate Change)

Refer separate document

Department of Conservation advice for EPA compliance assessment

Overview

Project name	Remarkables Ski Area Upgrade and Doolans Expansion
Project applicant	NZSki
EPA unique ref. no	FTAA-2605-1236
EPA Request Number	CRM:013014693
Conservation approvals sought	Concessions • A new concession (“Doolans Concession”) authorising all activities associated with the expansion of the ski area into the Doolans Basin, as well as the supporting infrastructure that spatially traverses the Rastus Burn (i.e. over the existing Remarkables Concession); • New concession (“the Remarkables Base Concession”) authorising an expansion to the existing Rastus Burn Base Building and associated buildings and utilities located within the access road and Car Park 3; • A variation to concession 96118-SKI (“Remarkables Concession”) to remove the existing Rastus Burn Base Building from the Remarkables Ski Field in the Rastus Burn. Wildlife Approvals • Wildlife approval to capture, relocate and, as a last resort, destroy nests (to force re-nesting within the same breeding season) of eastern falcon and New Zealand pipit; • Wildlife approval to disturb, injure and/or kill McCann’s skink within the Project’s vegetation and earthworks footprint. Complex Freshwater Fisheries Activity Approvals A number of tributaries of the Doolans Creek Right Branch will be traversed by culverts and fords to provide access for vehicles and utilities, as well as skiers during the winter months. A weir structure is also proposed within the Doolans Creek Right Branch, and an existing tarn will be dammed for water storage purposes. An approval or dispensation for an authorisation under the Freshwater Fisheries Regulations is therefore sought.

EPA request overview	To inform the EPA's completeness assessment of the application, please provide the Department of Conservation's views on whether the documentation provided by the EPA regarding the above approval/s, as provided by the applicant, meets the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail to satisfy the purpose for which it is required, in accordance with section 44 of the Act. In your response, please include: • whether any relevant matters listed in clause 3 of Schedule 6 (information required in application for concession) have not been addressed or have not been provided in sufficient detail. • whether any relevant matters listed in clause 2 of Schedule 7 (information required in application for wildlife approval) have not been addressed or have not been provided in sufficient detail. • whether any relevant matters listed in clause 3 of Schedule 9 (information required in application for complex freshwater fisheries activity approval) have not been addressed or have not been provided in sufficient detail.
Date received	22 May 2026
Date due to EPA	29 May 2026

The purpose of this document is to provide advice to assist the EPA in making its decision whether the application lodged by NZSki on 20 May 2026 complies with the requirements of section 46(2) of the Act.

The advice also includes further observations of relevance to further processing of the application, for example where further information could be needed for a decision by the panel.

DOC understands that this document will be passed on to the applicant, the Panel Convener and the future Panel.

Compliance with information requirements

Our assessment of the information requirements for the relevant approvals is provided in the tables below. In summary, DOC's advice is that the application **does NOT meet** the requirements of sections 42, 43, and 44 of the Act.

DOC's view is that while no information requirements under clause 3 of Schedule 6 or clause 2 of Schedule 7 have been identified as entirely absent, the following information is not in sufficient detail:

Application for Concessions

- i. A description is not provided of the proposed activity in the lands sought to the north of the proposed infrastructure developments (cl 3(1)(a), Schedule 6);
- ii. Information to demonstrate consistency with important provisions of the Conservation Management Strategy are not provided (cl 3(1)(d), Schedule 6);
- iii. Sufficient information has not been provided about the extent to which the project is in keeping with the purposes for which the land is held, being *conservation purposes* (cl 3(1)(f), Schedule 6);
- iv. The potential effects of the proposal on heritage, ecology and on the land and its conservation values should climate change make the activity unviable in the future have not been sufficiently addressed (cl 3(1)(g), Schedule 6);

Application for Wildlife Approvals

- v. The application does not sufficiently state how the methods proposed to be used will ensure that best practice standards are met (cl2(f), Schedule 7) (avifauna and lizards);
- vi. The methods for humane destruction of avifauna nests (chicks and eggs) are not sufficiently provided (cl2(g), Schedule 7) (avifauna);
- vii. The location of the activity in regards avifauna is insufficiently addressed. While exact locations may not be known, a broad location for where the animals are expected to moved to should be provided (cl2(h), Schedule 7) (avifauna).

The sufficiency of the information provided will not enable DOC to report on all matters as required by clause 4 of Schedule 7 or clause 3 of Schedule 7 alongside additional matters which form part of a panel's decision-making criteria.

In particular it is DOC's view that information relating to activities in the project area and the project's ongoing viability (e.g. potential and actual effects of climate change on the newly proposed concessions) may be crucial to inform the decision of a panel. DOC strongly recommends that EPA clarify whether this information is present and sufficient amongst the application package and if not seek the information/reflect in its completeness determination.

Notification and Consultation

Section 29(1)(aa) of the Act requires that, from 1 April 2026, before lodging a substantive application for a listed project, the authorised person for the project must notify in writing relevant administering agencies. DOC is a relevant administering agency for this application.

Engagement by the applicant commenced in February 2026.

By way of letter received 10 March 2026, NZSki provided DOC with 20 working days' notice that they would be applying for this Project. That was however before the amendments to s29 of the Act to allow for notification, rather than consultation, had come into effect on 31 March 2026. That same letter did also “...*acknowledge that we (NZSki) are in the early stages of our consultation with DOC, and that this will continue in the weeks and months ahead.*”

Further information

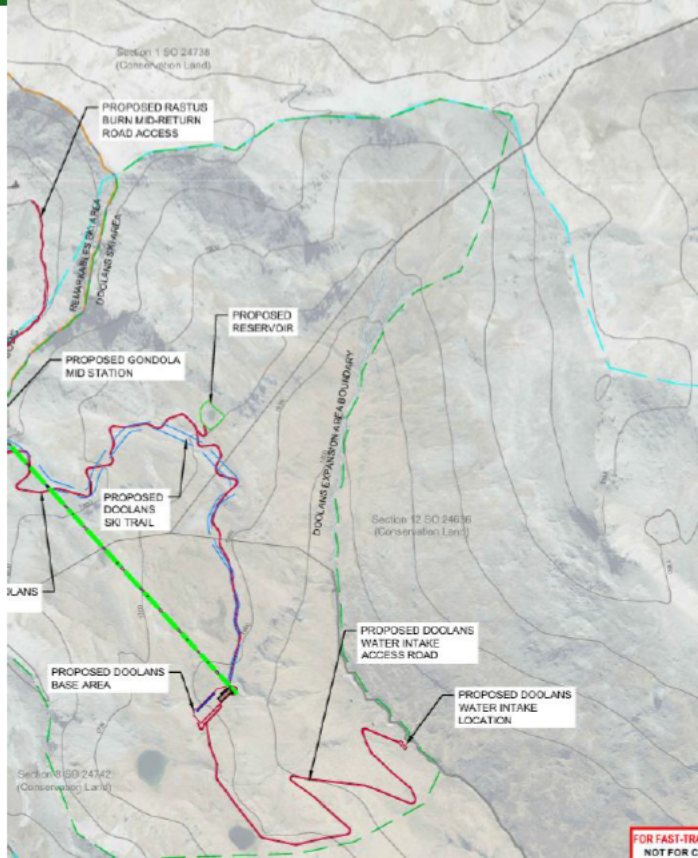
- The timeframe for this assessment has not allowed a complete analysis of every document lodged with the application.
- DOC has utilised the references provided in the Substantive Application Form that forms part of the application. Where the information could not be found at the referenced place, we have attempted to locate the information elsewhere within the suite of application documents.

Applications for concessions

Clause 3 of Schedule 6 outlines the information required in an application for a concession. All three of the concession activities have been assessed in the table below.

Note that the 'Application document reference' is from the Substantive Application Form A.03A. Additionally where the required information has been found elsewhere in the application documents that reference is also included.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
Clause 3(1) Schedule 6 - For the purposes of section 43(3)(e), an application for a concession must include the following information:				
(a) a description of the proposed activity:	Y	Part A.10 - Substantive Application Report - Section 3 - Project Description. Pg. 97	N	A description is not provided of the proposed activity in the lands to the north of the proposed infrastructure developments (i.e. the 2 northern 'sub-basins' within the green dotted line of the "Doolans Expansion Area Boundary" - see excerpt from map C00 E103 below). These have no proposed infrastructure, trails or obvious access from the proposed developments.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
				
(b) a description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out	Y	Part A.10 - Substantive Application Report - Section 3 - Project Description. Pg. 97	Y	

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
(including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places):		Part A. 09 - Substantive Application Report - Section 2 - Environmental Setting. Pg. 22 Part C – Project Maps and Drawings Part H - Conditions - H.08 - Concessions GPS Co-ordinates		
(c) information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less:	Y	Part A.17 - Substantive Application Report - Section 10.1 - Approvals Relating to the Conservation Act – Concessions under the Conservation Act. Pg. 437	Y	
(d) in the case of an application for an approval within paragraph (a) of the definition of concession or paragraph (a) of the definition of Reserves Act approval, information about the extent to which the project is consistent with— (i) the relevant conservation management strategy and	Y	Part A.17 - Substantive Application Report - Section 10.2 - Approvals Relating to the Conservation Act – Statutory Policy Documents. Pg. 450	N	Information to demonstrate consistency with important provisions of the Conservation Management Strategy (CMS) are not provided. Namely; 3.10 Structures and Utilities Policy 3.10.1(b): <i>Policy 3.10.1 - Should apply the following criteria when considering applications to erect or retain structures or</i>

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
conservation management plan: (ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity:				<i>utilities or for the adaptive reuse of existing structures on public conservation lands and waters:</i> <i>b) the outcomes and policies for the Places where activity is proposed to occur;</i> A key Outcome for the Western Lakes and Mountains Place is that: <i>Prominent landscape and geological features (ridgelines, and mountain tops) remain in their natural state, or are unmodified beyond their state at the time of becoming public conservation lands and waters);</i> Information about the extent to which the project is consistent with this outcome is not provided And: information about the extent to which the project is consistent with 3.25 Ski-fields Policy 3.25.2 is insufficient: Policy 3.25.2 (abbreviated) <i>Should in considering the development of new and existing authorised ski fields apply a precautionary approach to the approval of new structures, accommodation facilities and terrain modification and consider.....the likely longevity of the field in the face of climate change.....</i>

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
				Although the application acknowledges climate change and how the Doolans proposal is able to improve the resilience and extend the longevity of the ski area generally, due to its south facing aspect; this appears to assume that the Doolans Basin itself is not also affected by climate change. Insufficient information has been provided about how the Project, including new developments proposed in the Doolans Basin itself is consistent with a precautionary approach to developing a ski area in the face of climate change, noting the 40-year term sought. Climate change data and assessment supporting an expansion into the Doolans for the purpose of operating a ski area over the proposed term of the next 40 years, <i>in the face of climate change</i>, is absent.
(e) in the case of an application for an approval within paragraph (b) of the definition of Reserves Act approval, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977:	N/A			
(f) information about the extent to which the project is in keeping with the purposes for which the	Y	Part A.17 - Substantive Application Report - Section 10.3 - Approvals Relating to	N	The Doolans Basin is land held under s7 of the Conservation Act for conservation purposes

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
land is held, status, ownership and administration:		the Conservation Act – Concessions under the Conservation Act. Pg. 438 Part A.17 - Substantive Application Report - Section 10.3 - Approvals Relating to the Conservation Act – Decision-Making Considerations for Concessions Pg. 475		The application sets out the definition of conservation from the Conservation Act: <i>the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations</i> ‘Preservation’ and ‘protection’ are likewise specifically defined in the Conservation Act and ‘Intrinsic Value’ is defined in Conservation General Policy. Information has not been provided in the application about the extent to which the project (for those parts in the Doolans Basin) is in keeping with <i>the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values</i> or for <i>safeguarding the options of future generations</i> Instead, the application limits its information in support of cl3(1)(f) to a description of the relative size of the proposal vs. the wider Remarkables Conservation Area; the recreational benefit; proximity to the Rastus Burn Recreation Area (noting this is held for a different purpose); and the proposed environmental management regime.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
(g) a description of— (i) the potential effects (positive and negative) of the proposed activity: (ii) any actions that the applicant proposes to take to avoid, remedy, mitigate, offset, or compensate for any adverse effects of the proposed activity: (iii) details of the type of concession for which the applicant is applying:	Y	g(i) Part A.13 - Substantive Application Report - Section 6 - Assessment of Environmental Effects. Pg.189 Part A.17 - Substantive Application Report - Section 10.1 - Approvals Relating to the Conservation Act – Concessions under the Conservation Act. Pg. 439 g(ii) Part A.13 - Substantive Application Report - Section 6 - Assessment of Environmental Effects. Pg. 189 Part A.14 - Substantive Application Report - Section 7 - Management and Monitoring of Actual and Potential Effects. Pg. 273 g(iii) Part A.11 - Substantive Application Report – Section 4.3 – Approvals	N	<u>Climate Change:</u> Potential effects on the land and its conservation values should climate change make the activity unviable in the future have not been sufficiently assessed, leaving uncertainty around the project’s feasibility and potential adverse effects. <u>Heritage:</u> As acknowledged in the Heritage Assessment, the area of the proposed water take and access road to it were not surveyed. Typically, if there were high altitude gold mining or gold prospecting, it would be along the small flats on either side of the stream where the proposed intake is. This area needs to be surveyed so potential heritage effects are sufficiently understood and appropriately managed if/as required. <u>Vegetation and related ecosystems:</u> The application does not put the vegetation ecosystem into the context of the wider ecological district (ED). There has not been an assessment of the ecological importance (including representativeness) of the indigenous biodiversity and ecosystems of the Doolans Basin in the context of other basins in the ED. Therefore, the effects are not sufficiently or accurately described. This will have flow on effects to fauna also. <u>Invertebrates</u>

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
		sought under the FTAA – Conservation Act 1987. Pg. 174 Part A.17 - Substantive Application Report - Section 10.1 - Approvals Relating to the Conservation Act - Concessions under the Conservation Act. Pg. 437		There are limitations in the baseline dataset that introduce uncertainty regarding the completeness of the assessment of alpine invertebrate values. In particular, sampling was restricted to mid-late summer and may under-represent seasonally active alpine taxa (noting the recognised importance of spring-early summer activity). In addition, some taxonomic groups of potential ecological significance, including alpine cicadas (Cicadidae), do not appear to have been explicitly considered. These gaps influence confidence in the completeness of the terrestrial invertebrate assessment and the characterisation of conservation values present within the project area. <u>Avifauna</u> A threatened avifauna species with potential to be affected but not recorded during field surveying is rock wren (<i>Xenicus gilviventris</i> – Nationally Endangered). Targeted surveying along the bottom of rocky bluffs and through boulderfields would be more likely to detect this species if they were present; as opposed the surveying undertaken. This species should be considered in the Terrestrial EIA. Construction of new access roads is mentioned in the Terrestrial EIA, but the potential indirect impacts of these roads are not addressed. These provide a track for predator access and there will likely be an increased effect of introduced species, particularly feral cats which are known

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
				to use these access routes readily. Assessment of this increased risk is missing from the application.
(h) a statement of— (i) the proposed duration of the concession; and (ii) the reasons for the proposed duration:	Y	Part A.11 - Substantive Application Report – Section 4.3 – Approvals sought under the FTAA – Conservation Act 1987. Pg. 174 Part A.17 - Substantive Application - Section 10.1 - Approvals Relating to the Conservation Act – Concessions under the Conservation Act. Pg. 437, 440	Y	
(i) relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence or has any current criminal charges pending before a court):	Y	Part A.15 - Substantive Application Report - Section 8.4 – FTAA 2024 Requirements - Requirements for a Substantive Application - Pg. 294 Part A.17 - Substantive Application Report - Section 10.1 - Approvals Relating to the Conservation Act - Concessions under the Conservation Act. Pg. 437 Pg. 440	Y	

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
(j) if the applicant applies for a lease, a licence granting an interest in land, or an easement, (i) reasons for the request; and (ii) sufficient information to satisfy the panel that, in terms of clause 7, it is appropriate under section 81 to grant the lease, licence, or easement (as the case may be):	Y	Part A.17 - Substantive Application Report - Section 10.1 - Approvals Relating to the Conservation Act - Concessions under the Conservation Act. Pg.440 Part A.17 - Substantive Application Report - Section 10.3 - Approvals Relating to the Conservation Act - Decision making considerations for Concessions. Pg.476	Y	
(k) full details of any consultation undertaken with relevant iwi and with reserve owners and managers:	Y	Part A.12 - Substantive Application Report - Section 5.2 - Consultation and Engagement – Engagement with Mana Whenua. Pg. 181	N/A	DOC is unable to determine the sufficiency of engagement with iwi.
(l) information about financial and legal liabilities and obligations associated with the land:	Y	Part A.17 - Substantive Application - Section 10.1 - Approvals Relating to the Conservation Act - Concessions under the Conservation Act. Pg. 441	Y	
(m) in the case of an application for an approval referred to in	N/A		N/A	

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
paragraph (b) of the definition of Reserves Act approval where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve:				
(n) confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that right for the purposes of any lease proposed in the application if— (i) the proposed lease would be for a term (including any renewals) that will, or is likely to, be more than 50 years; and (ii) the granting of the lease would trigger the right of first refusal or right of offer or return.	N/A		N/A	

Applications for wildlife approvals

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

Note that the 'Application document reference' is from the Substantive Application Form A.03A. Additionally where the required information has been found elsewhere in the application documents that reference is also included.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
Schedule 7 clause 2(1) - For the purposes of section 43(3)(h), an application for a wildlife approval must include the following information:				
(a) specify the purpose of the proposed activity:	Y	Part A.10 – Project Description (s3, p.97) Part A.11 – Substantive Application – Section 11.1 Approvas relating to Wildlife Act 1953 P478 Part A.18A – Substantive Application – Section 11 Approvals relating to Wildlife Act	Y	
(b) identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land):	Y	Part A.10 – Project Description (s3, p.97) Part A.13 Assessment of	Y	

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
		environmental effects, p189 Part A.11 Section 11.1 Approvals relating to Wildlife Act 1953 P478 Part A.18A – Substantive Application – Section 11 Approvals		
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Y	Part A.11 Section 11.1 Approvals relating to Wildlife Act 1953 P479 Part A.18A section 11.1, 11.2; A.13, B.12A, B13.A	Y	
(d) list protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted:	Y	Part A.11 Section 11.1 Approvals relating to Wildlife Act 1953 P482 Part A.18A section 11.1	Y	
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Y	Part A.11 Section 11.1 Approvals relating to Wildlife Act 1953 P482 Part A.18A section 11.1	Y	

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
(f) state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Y	Part A.11, P483 Part A13 – Substantive Application – Section 6 – AEE, pg 189 Part A.18A section 11.1, Part A.13 – Section 6 – Assessment of Environmental effects, H.06A Wildlife Approval – Avifauna	N	<u>Avifauna</u> Information to ensure best practice standards are met is not sufficient. For example, information on how methods for relocation of nests ensures best practice is not provided; including examples of where this has successfully occurred for this or similar species. <u>Lizards</u> Information to ensure best practice standards are met is not sufficient. This includes why salvage (mitigation) is not being proposed ahead of compensation; which is not best practice. The methods do not state how best practice standards are met.
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Y	Part A.18A section 11.1, Part B.13, Lizard A and M Plan Section 4.4-4.7, pg 23 Part B.12 Table 18, pg 137,	N	<u>Avifauna</u> The methods for humane destruction of avifauna nests (chicks and eggs) is not sufficiently provided.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
		Part A11 section 11.1		
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):	Y	Part A.11 section 11.1 Part A.18A section 11.1 Part B.12 Table 18 pg 137, Part B.13, Lizard A and M Plan, section 4.4-4.7 H.06 Wildlife Approvals Avifauna, H.07 Wildlife approval Lizards	N	<u>Avifauna</u> The application identifies the project footprint and includes mapped areas of disturbance, with the draft wildlife approvals confirming that collection and release locations will be spatially defined and recorded. However, specific locations for wildlife relocation are not identified in the application, and therefore the level of spatial detail remains insufficient. We acknowledge exact locations may not be known, but we expect a broad location for where they propose to move them to.
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:	Y	Part A11, Section 11.1 P486 Part A.18A section 11.1	Y	
(j) list all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site:	Y	Part A.13 Assessment of Environmental effects, Part B.12 TEIA, Part B.13 Lizard assessment and management plan	Y	

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
(k) where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife):	Y	Part A.13 Assessment of Environmental effects, Part A.14 s7, Part H proposed conditions	Y	
(l) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953:	Y	Part A.11, section 11.1, Part A.18A section 11.1	Y	
(m) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court:	Y	Part A.18A section 11.1	Y	
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	Y	Part A.12 - s5 – Consultation and Engagement	N/A	
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Y	Part A.18, Part B.12 TEIA, Part B.13, Part B.30 Ecology Memo	Y	

Applications for complex freshwater fisheries approvals

Clause 3 of Schedule 9 outlines the information required in an application for complex freshwater fisheries activity approval.

Note that the 'Application document reference' is from the Substantive Application Form A.03A. Additionally where the required information has been found elsewhere in the application documents that reference is also included.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comment
Clause 3 of Schedule 9 for substantive applications				
(a) in relation to the structure and any fish facility: (i) a description of the type of structure or fish facility: (ii) the dimensions of the structure or fish facility: (iii) the design of the structure or fish facility: (iv) the placement of the structure or fish facility: (v) the water flows: the operating regime:	Y	Part A.19, section 12; Part C; Part H; Part B.08,09,14,16,20 and 21. Part B-08A Section 2; Part B-09 Sections 4.4 & 6.2; Part B16 Section 5; Part B-21A Sections 6, 7, 8 & 9.	Y	
(b) the freshwater species and values present (with particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System):	Y	Part B-09 Sections 4 & 5	Y	
(c) the water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream):	Y	Part A.09 section 2.8 and A.19 section 12. B-08A Sections 4 & 5	Y	
(d) how the passage of fish will be provided for or impeded.	Y	Part A.19, section 12, pg 492. Part B-09 Sections 4.4 and Part B-21A Section 5	Y	

MEMORANDUM

To: Ben Bond, Environmental Protection Authority

From: Mitchell Daysh Limited

Date: 1 July 2026

Re: FTAA-2605-1236: Request for further information in relation to your application under the Fast-track Approvals Act 2024

This memorandum sets out, and responds to, each of the queries raised in the FTAA-2605-1236 S46 Request for Further Information (“**RFI**”) dated 4th June 2026, relating to the Remarkables Expansion Project.

This memorandum refers to, and is supported by, the following attachments

- > Remarkables Expansion Project Transport Addendum, prepared by Stantec (attached as **Appendix A**);
- > Memorandum regarding the climate change resilience of the Project, prepared by NZSki (attached as **Appendix B**); and
- > Remarkables Expansion Project Ecology Addendum, prepared by e3Scientific (attached as **Appendix C**).

It is noted that a number of the requests for further information stem from comments arising from the Department of Conservation (“**DOC**”) and the Queenstown Lakes District Council (“**QLDC**”). Notably, in its comments, DOC states “*DOC’s view is that while no information requirements under clause 3 of Schedule 6 or clause 2 of Schedule 7 have been identified as entirely absent, the following information is not in sufficient detail*”.

NZSki considers that many (if not all) of the matters raised by DOC (and others) are matters relating to the assessment of the substantive application, rather than matter which relate to completeness under section 46(2) of the Fast-track Approvals Act 2024. Notwithstanding, in the interests of transparency and ensuring that NZSki continues to narrow any points of difference between itself and invited parties, this memorandum provides further detail in responses to the queries raised in the RFI. NZSki considers the substantive application should be considered complete under section 46 of the Fast-track Approvals Act 2024.



RESOURCE CONSENT – SCHEDULE 5 INFORMATION REQUIREMENTS

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

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

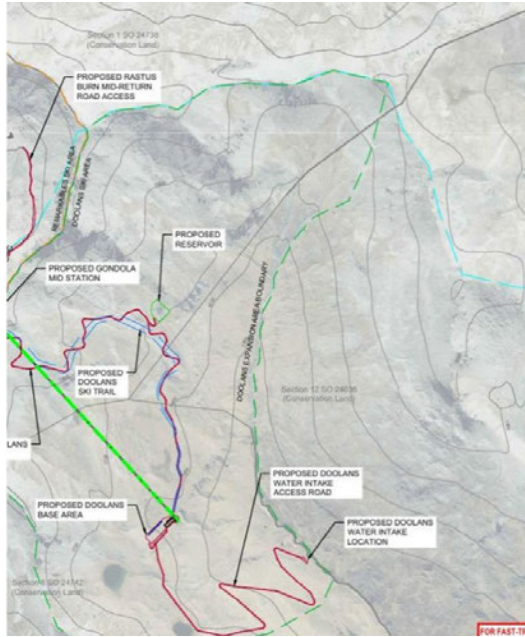
Please provide any further information you wish to have considered in response to this comment from QLDC.

Stantec has prepared a short addendum to their original transportation assessment. A copy of the addendum is attached as **Appendix A** of this memorandum. In summary, Stantec provides further information regarding:

- > The wider transportation network and network improvements that are currently underway or proposed in the near future;
- > The traffic patterns of the surrounding network, in particular, within Frankton;
- > The current challenges the transportation network is facing within the area; and
- > The mitigation measures that NZSki is proposing to manage the effects (that it can control) within the wider context of the above transportation setting.

CONCESSION - SCHEDULE 6 INFORMATION REQUIREMENTS

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



The two northern ‘sub-basins’ referred to by DOC have been included in the proposed ‘Licence Land’ of the concession¹ for the Doolans Expansion Area for off-piste skiing. Off-piste skiing (being skiing on natural, ungroomed snow) is a common activity on New Zealand ski fields and provides ski field visitors with additional variety of skiing, improving their recreational experience. NZSki already facilitates off-piste skiing within the Rastus Burn Concession Area such as the Homeward Run/Outward Bound and Scarpa Run ski trails on the north-western area of the existing Remarkables Ski Area.

The Project Description (Section 3 of the Substantive Application) makes reference (on page 128) to providing for “... off-piste skiing throughout the Doolans Basin when snow conditions allow”.² The Project has sought that the proposed concession extend along the northern ridgeline and down to the valley floor of the Doolans Basin as NZSki consider that experienced, off-piste skiers will likely exit the Doolans Gondola at Helicopter Ridge and traverse the ridgeline into this area. While no groomed ski trails, structures or infrastructure are proposed to be authorized in the area, NZSki may erect temporary safety fencing (e.g. snow netting, mesh fencing, etc.) and safety signage during the ski season as part of being a responsible ski field operator. NZSki may also undertake the following activities in the area in accordance with that broader responsibility:³

- > Avalanche control work;
- > First aid and ski patrol services; and

¹ H.03 Concession Doolans Expansion, Schedule 1, 1. Land

² Refer to Part A, Document A.10 Project Description, page 128.

³ To be authorized under H.03 Concession Doolans Expansion, Schedule 1, Condition 2

> Search and rescue services.

Snow vehicles will only enter the area to undertake the above activities and only when necessary.

NZSki would welcome further discussion with DOC regarding the inclusion of the above area within its proposed concession boundaries and whether further conditions are required to appropriately narrow its use within the parameters noted above.

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

A description of the consistency of the parts of the Project in the Doolans Basin on land held for “conservation purposes”, as defined in the Conservation Act, has previously been provided as part of the lodged Substantive Application.⁴

Conservation is defined in the Conservation Act⁵ as:

...the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations

The terms “protection” and “preservation” have the following meanings, as defined in the Conservation Act.⁶ Importantly, these definitions include the wording ‘so far as is practicable’ which has the effect of not precluding use and development:

“Protection, in relation to a resource, means its maintenance, so far as is practicable, in its current state; but includes—

(a) Its restoration to some former state; and

(b) Its augmentation, enhancement, or expansion.”

“Preservation, in relation to a resource, means the maintenance, so far as is practicable, of its intrinsic values.”

⁴ Remarkables Ski Area Upgrade and Doolans Expansion, Part A – Substantive Application, Section 10.1, pg.439

⁵ Conservation Act 1987, Section 2

⁶ Conservation Act 1987, Section 2

As detailed in the Substantive Application, the design of the Project has been undertaken iteratively (including in response to feedback received from relevant agencies pre-lodgement) to ensure that the environmental effects on resources within the Doolans Basins are avoided or minimised, **so far as practicable**, while providing an opportunity for the public's enhanced appreciation and recreational enjoyment of the area. Notably, this includes (but is not limited to):

- > Co-locating infrastructure and trails to ensure the ski area has the smallest physical disturbance footprint practicable, thus maintaining the vast majority of the concession area in its current state;
- > Avoiding key areas of indigenous vegetation through careful trail and infrastructure siting and design and where avoidance is not practicable, minimising the footprint of the affected area;
- > Where vegetation removal is required, undertaking such works in accordance with agreed DOC and NZSki protocols (as applied at the Remarkables Ski Area);
- > Minimising the volume of earthworks required by forming a single vehicle access and ski trail in the Doolans Basin and utilising the natural topography of the land where practicable to form the access /ski trail;
- > Where larger volumes of earthworks are proposed (such as at the mid station and where retaining walls are proposed), these works are vertical cuts (and utilise retaining walls) rather than cut and fill which would require a larger footprint and area of disturbance. In the case of the mid station cuts, these works are proposed to minimise the visibility of the mid station;
- > Ensuring that the overall vegetation disturbance is minimised, key threatened and at-risk species are proposed to be relocated in accordance with NZSki and DOC's existing vegetation relocation protocols at the Remarkables Ski Area;
- > Utilising an existing tarn for water storage, rather than creating a new reservoir which would further increase the vegetation and earthworks disturbance. While consideration was given to pumping water from the Rastus Burn, this was discredited early to avoid transferring water from one catchment to another, particularly where didymo is present within the Rastus Burn; and
- > Applying accidental discovery protocols to the small area of the works footprint that has not been subject to a detailed walk over by heritage experts.

The above demonstrates that NZSki has sought to preserve and protect the resources within the Doolans Basin, as far as reasonably practicable, in accordance with the conservation purposes for which the land is held.

In addition to the above, and as detailed in the Substantive Application:

- > The total footprint of the expansion into the Doolans Basin impacts only a small part (just over 1%) of the wider Remarkables Conservation Area (33,000 ha). The actual area of vegetation disturbances is considerably smaller, with the wider vegetation disturbance across the Rastus Burn and Doolans being in the order of 15.94 hectares, or 0.4% of indigenous vegetation cover located above 1,100m;
- > The relatively small size of the ski field expansion and very small (relatively) footprint of development provides for the appreciation and recreational enjoyment of the conservation land by the public (similar to tracks, trails, huts and associated car parks that are formed through large areas of conservation estate) while prioritizing the preservation and protection of the natural and historic resources of the wider conservation area, safeguarding the land for future generations; and
- > Commercial ski fields provide (relatively for the alpine environment) safe and convenient access for the public to recreational activities in the alpine environment. The Doolans Basin is currently relatively inaccessible for the vast majority of the public due to its geographical location and limited access options, limiting the number of people who can appreciate and obtain recreational enjoyment out of the conservation land. The ski field expansion into the Doolans Basin will create safer and more convenient recreational access to the conservation land for the public – in winter and summer. This is in keeping with the conservation purpose of the conservation land within Doolans Basin as it will provide the public with greater ability to access the conservation land for their appreciation and recreational enjoyment.

NZSki's purposeful approach to effects management initially from its design and siting of infrastructure and trails, through to the subsequent management of effects through conditions and management plans ensures the ongoing preservation and protection of the natural and historic resources of the wider conservation area, safeguarding the land for future generations, while still managing to provide for the appreciation and recreational enjoyment of the conservation land by the public through the ski field expansion.

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

- a. ***With reference to sub-clause (d) - Information addressing Ski-fields Policy 3.25.2 of the Otago Conservation Management Strategy, which requires the application of a precautionary approach ... the likely longevity of the field in the face of climate change, and any appropriate land remediation and facility removal costs should the ski field cease to operate; and***

As recognised by DOC, the proposed expansion into the Doolans Basin is intended to assist with the future resilience of the Remarkables Ski Area in the face of a changing climate. NZSki has not assumed that the Doolans Basin will not be affected by climate change. NZSki has instead sought to utilise the basins natural characteristics which allow it to capture and retain snow for longer than the existing ski area within the Rastus Burn. This is detailed in the NZSki Limited memorandum attached in **Appendix B**, which provides:

- > Background context for the known and published scientific research regarding the forecasted effect of climate change on New Zealand's Alpine Ski Areas which supports the long-term reliability of the Doolans Basin for alpine activities;
- > The long-term snow accumulation trends within the Rastus Burn over the past 20 years;
- > Details of historic and recent advances in snow making technology and NZSki's experience successfully implementing this technology; and
- > NZSki's commitment to remove structures in the unlikely event the ski field was to cease operating at the end of its concession, including requirements to replant the affected land with indigenous vegetation of a similar abundance and diversity as that which existed generally in the vicinity prior to the structures or improvements being installed.

With specific reference to Policy 3.25.2, the policy states:

Should in considering the development of new and existing authorised ski fields 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.

As set out in the memorandum prepared by NZSki, it anticipated that climate change **will not** render the ski field operations unviable within the 40-year term of concession sought, given the known (published) science, the aspect and elevation of the Doolans Basin and the ongoing advances in snow making technology.

As detailed in the Substantive Application, the Project is designed to minimise the overall terrain modification and utilise the existing contour of the land where practicable. This has resulted in a single earth-worked ski trail and vehicle access into the Doolans Basin. While snow making facilities are proposed as part of the Project, retaining residual minimum flow within the Doolans

Creek Right Branch (proposed to be secured by draft conditions of consent) will ensure sufficient water remains within the catchment for the duration of the water take consent.

As noted earlier, various remediation measures have been proposed by NZSki as conditions on its Doolans Concession (which largely mimic those of the existing Remarkables Ski Area Concession), including requirements around the removal of structures and the remediation of the land using indigenous vegetation of a similar abundance and diversity as that which existed generally in the vicinity prior to Project commencing. This is secured through NZSki's parent company, Trojan Holdings Limited, as the Grantor of the concession.

In light of the above, even when a precautionary principle is applied to the proposed Doolans Concession, the evidence and technological advances suggest that skiing within the Doolans Basin will continue to be feasible beyond the term of the proposed concession. In the context of NZSki's wider operations, it should also be noted that this particular policy, and the application of the precautionary principle, did not present any statutory barriers for the recent renewal of the Remarkables Ski Area Concession which was granted for a 38-year term.

- b. With reference to sub-clause (g) - Information addressing the potential climate change effects on the land and its conservation values should climate change make the activity unviable in the future.***

Schedule 6 Section 3 Clause (1(g)) of the Fast-track Approvals Act only requires a description of "the potential effects (positive and negative) of the proposed activity". The 'potential climate change effects on the land and its conservations values...' is not an 'effect' of the Project and therefore is not a consideration under the clause.

This matter has, however, been broadly addressed early in response to query 4a above and is therefore not repeated here.

- 5. With reference to sub-clause (g), DoC has also noted a lack of detail in relation to the following potential effects of the proposal:***

"Vegetation and related ecosystems:

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

Invertebrates

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

Avifauna

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

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

e3Scientific has prepared a memorandum that directly responds to these matters. Please refer to **Appendix C**.

WILDLIFE ACT AUTHORITY – SCHEDULE 7 INFORMATION REQUIREMENTS

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

Avifauna

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

Lizards

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

e3Scientific has prepared a memorandum that directly responds to these matters. Please refer to **Appendix C**.

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

Avifauna

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

e3Scientific has prepared a memorandum that directly responds to these matters. Please refer to **Appendix C**.

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

Avifauna

The application identifies the project footprint and includes mapped areas of disturbance, with the draft wildlife approvals confirming that collection and release locations will be spatially defined and recorded. However, specific locations for wildlife relocation are not identified in the application, and therefore the level of spatial detail remains insufficient. We acknowledge exact locations may not be known, but we expect a broad location for where they propose to move them to.

e3Scientific has prepared a memorandum that directly responds to these matters. Please refer to **Appendix C**.

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

e3Scientific has prepared a memorandum that directly responds to these matters. Please refer to **Appendix C**.



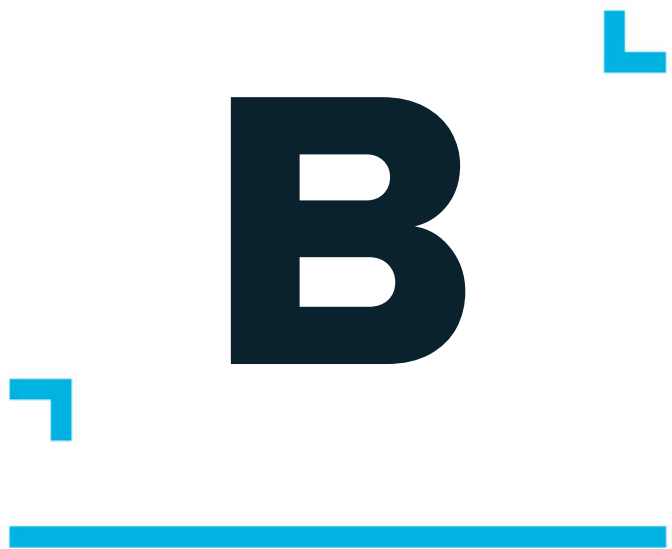
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APPENDIX A

Remarkables Expansion Project
Transport Addendum (Stantec)

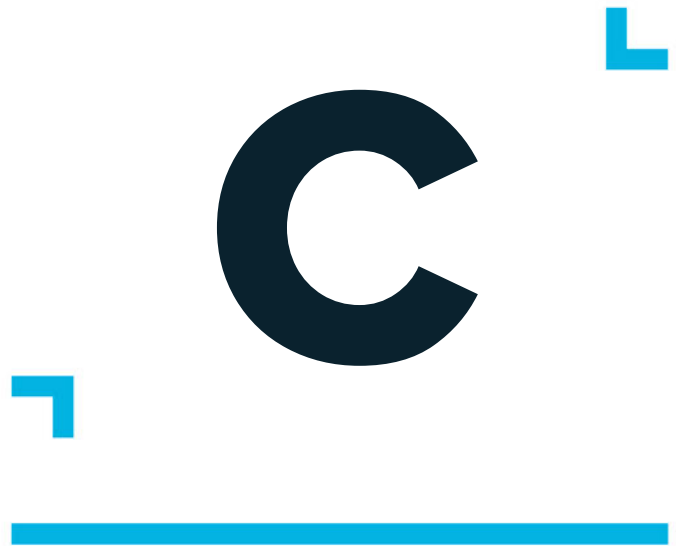




APPENDIX B

Memorandum regarding the climate
change resilience of the Project
(NZSki)





APPENDIX C

Remarkables Expansion Project
Ecology Addendum (e3Scientific)



Remarkables Expansion Project

Transport Addendum



Prepared for:
NZSki

Date:
25 June 2026

Prepared by:
Stantec NZ

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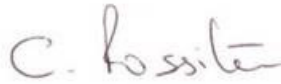
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Christopher Rossiter is a Principal Transportation Engineer at Stantec New Zealand Limited (**Stantec**). He has held this position since 2013 and been employed at Stantec (and TDG prior to its incorporation with Stantec) since 2006. Prior to joining TDG (now part of Stantec), he was employed as a Principal Systems Engineer and Technical Manager with BAE Systems in England.

Chris holds the academic qualifications of Bachelor of Science from the University of Exeter and Bachelor of Arts (Open) from the Open University, England.

Chris is registered as a Chartered Professional Engineer with Engineering New Zealand. He has 40 years' engineering experience including 19 years' transportation engineering in New Zealand on a wide range of projects involving transportation engineering design, road safety audits, transportation planning and assessment.

Chris' role at Stantec includes preparing transportation assessment reports for resource consent applications and also providing transportation engineering services for many councils.¹ He has prepared expert transport evidence on behalf of councils and also for private developers in relation to a variety of land-use resource consent hearings and plan changes. His experience includes providing transportation engineering advice and assessment for a wide variety of land development projects across the South Island including large industrial sites such as the Southern Link Inland Port.

This report has been prepared in compliance with the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 as if it was expert evidence presented in proceedings before the Environment Court. Unless stated otherwise, this report is within Chris' area of expertise and does not omit consideration of material facts known to him that might alter or detract from the opinions expressed in this report.

¹ Hastings, Central Hawke's Bay, Gisborne, Palmerston North, Whanganui, Carterton, Upper Hutt, Tasman, Nelson, Buller, Waimakariri, Christchurch, Ashburton, Timaru, Clutha, Queenstown Lakes, Invercargill.



Executive Summary

Following the lodgement of the substantive application by NZSki Limited (NZSki) for the Remarkables Ski Area and Doolans Expansion Project under the Fast-track Approvals Act, the Environmental Protection Authority (EPA) has requested a response to a s46 comment received from Queenstown Lakes District Council (QLDC) regarding the assessment of the wide area traffic effects of the Project.

QLDC has developed a Spatial Plan to inform decisions on areas for future residential development and the supporting infrastructure. The Spatial Plan anticipates significant residential growth along the Southern Corridor within which the Remarkables Ski Field Access Road intersection is located. The NZ Upgrade Programme (NZUP) Queenstown Package was developed with NZ Transport Agency (NZTA) to address transport infrastructure improvements to meet the forecast travel demands. The NZUP Queenstown Package, which is currently under construction, includes large scale changes to the highway network in Frankton to improve capacity and support public transport services. The transport components of the Te Tapuae Southern Corridor Structure Plan have been developed to inform decisions on the highway improvements required to support future planned growth along the Southern Corridor.

The ski season typically lasts for about three months of the year and attracts large numbers of visitors to Queenstown. Currently, the preferred travel mode choice for visitors to the Remarkables Ski Area is private vehicle. In 2025, this contributed to an estimated 1,700 additional vehicle movements per day (vpd) on average on the highway network between the Remarkables Ski Area Access Road and Frankton and about 300 vpd to the south. The movements north of the Remarkables Ski Area are then dispersed between SH6A Frankton Road and SH6 Ladies Mile. Even with the ski season activity, winter traffic volumes on all the highways within Frankton and Queenstown were below the volumes recorded during the summer. Although there are capacity constraints on the transport network, the operational performance of the network is expected to be better during the winter than in the summer because of the lower overall travel demands.

When the Project construction works are complete, the Remarkables Ski Area could generate about 3,000 vehicle movements on the busier days of the season compared with about 2,000 movements currently. While this largely involves travel to / from the north at the current time, with the ongoing growth to the south, there will be increasing travel demands to the Remarkables Ski Area from the south in the future. If the future travel demand from the south doubled compared with 2025, the change in traffic volumes on SH6 north of the Remarkables Ski Area would be about 700 vpd during the ski season.

At an annualised level, the forecast increase in the Remarkables Ski Area traffic movements represents a very small proportion of the total anticipated traffic growth on the Southern Corridor. The Remarkables Ski Area could add 250 vpd by 2030 at an annualised level compared with more than 8,000 vpd over the same period from residential development along the Corridor

Although the traffic generated by the Remarkables Ski Area does coincide with other peak periods of the road network, the directionality of traffic is generally the opposite of the primary commuter peak traffic patterns, particularly to the south of Frankton. Overall, the traffic generation of the Project forms only a small proportion of the total traffic generation of the development along the Southern Corridor. Any transport effects directly associated with the ski activity are highly localised and are of short duration, predominantly in the late afternoon near the access road rather than across the wider transport network.



While wider growth in highway volumes and transport network upgrades are outside their control, the proposed conditions of consent have been structured to allow NZSki to manage their forecast growth in vehicle movements and inform decisions on intersection improvements on SH6 to effectively and flexibly manage their travel demand and localised traffic effects as changes on the wider transport network occur.



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Appendix A Wakatipu Travel Patterns

A.1	State Highway 6 – Ladies Mile
A.2	State Highway 6 – Kawarau Road
A.3	State Highway 6A – Frankton Road
A.4	SH6 South of Remarkables Ski Area
A.5	SH6 / SH6A Intersection



1 Introduction

Following the lodgement of the substantive application by NZSki Limited for the Remarkables Ski Area and Doolans Expansion Project under the Fast-track Approvals Act, the EPA has provided the following comments from QLDC with a request for additional information to be provided.

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

This report has been prepared as an addendum to the Integrated Transport Assessment to provide the additional information that has been requested. It has been structured to provide:

- An overview of the wide area transport network and network improvements;
- A description of traffic patterns within Frankton;
- A description of the transport network challenges;
- A summary of transport mitigation actions proposed by NZSki.



2 Transport Infrastructure

2.1 State Highway Network

Figure 2-1 shows the location of the Remarkables Ski Area (1) with respect to the state highway network and nearby residential areas. The bottom of the Remarkables Ski Field Access Road is about 10 km by road from central Queenstown (2) and less than 4 km from Frankton (3) and Queenstown Airport. Jack's Point (5) and Hanley Farm (6) are located about 5 km and 4 km to the south respectively. Homestead Bay (7) is located to the south of Jack's Point. The Coneburn industrial zone is about 1 km south of the access road. The Remarkables Ski Field Access Road is about 13 km long from its intersection with SH6 to the Rastus Burn Base Area.



Figure 2-1: Remarkables Ski Area location – wide area context (Source: Te Tapuae Structure Plan)

SH6 represents the primary strategic transport link in the wider area connecting the major settlements of Wānaka and Cromwell to the north with Queenstown and smaller towns to the south. Figure 2-2 shows that SH6 Ladies Mile follows an alignment along the northern side of the Frankton Flats area providing access to the Glenda Drive Industrial Area, Five Mile and the Queenstown Events Centre as well as new activities under development on the northern side of the highway. SH6 Kawarau Road provides access to Queenstown Airport, Remarkables Park and the residential parts of Frankton.

SH6A Frankton Road provides the connection between SH6 and central Queenstown. The SH6 / SH6A intersection is currently roundabout controlled but there are ongoing roadworks to signalise the intersection.



Figure 2-2: Frankton Area (Source: Open Street Maps)

3 Planned Network Improvements

3.1 NZUP Queenstown Package

QLDC and NZTA have formed the Kā Huanui a Tāhuna consortium along with four design and construction companies to implement the NZUP² Queenstown Package. The Queenstown Package comprises several smaller packages of work with an overall goal to deliver infrastructure that:

- improves safety and accessibility;
- enables an improved public transport system;
- provides more options for walking and cycling; and
- benefits the community and its visitors.

Figure 3-1 shows the package of works for Frankton which includes:

- New signals at SH6 / SH6A intersection;
- New signals at SH6 / Lucas Place (Primary airport access route);
- New signals at SH6 / Humphrey Street (Secondary access route to Remarkables Park);
- Expanded bus hub in Frankton; and
- Bus priority lane on SH6 Kawarau Road north of Humphrey Street.

The works in Frankton include signalisation of the SH6 / SH6A intersection and construction of an expanded bus transfer facility on Kawarau Road south of the intersection (Figure 3-2). A key focus of the works is improving bus travel times and reliability to promote higher mode share. The projects do not seek to add additional road capacity through provision of additional traffic lanes.

² New Zealand Upgrade Programme



Remarkables Expansion Project
3 Planned Network Improvements



Figure 3-1: NZUP Queenstown Package (Source: NZTA)

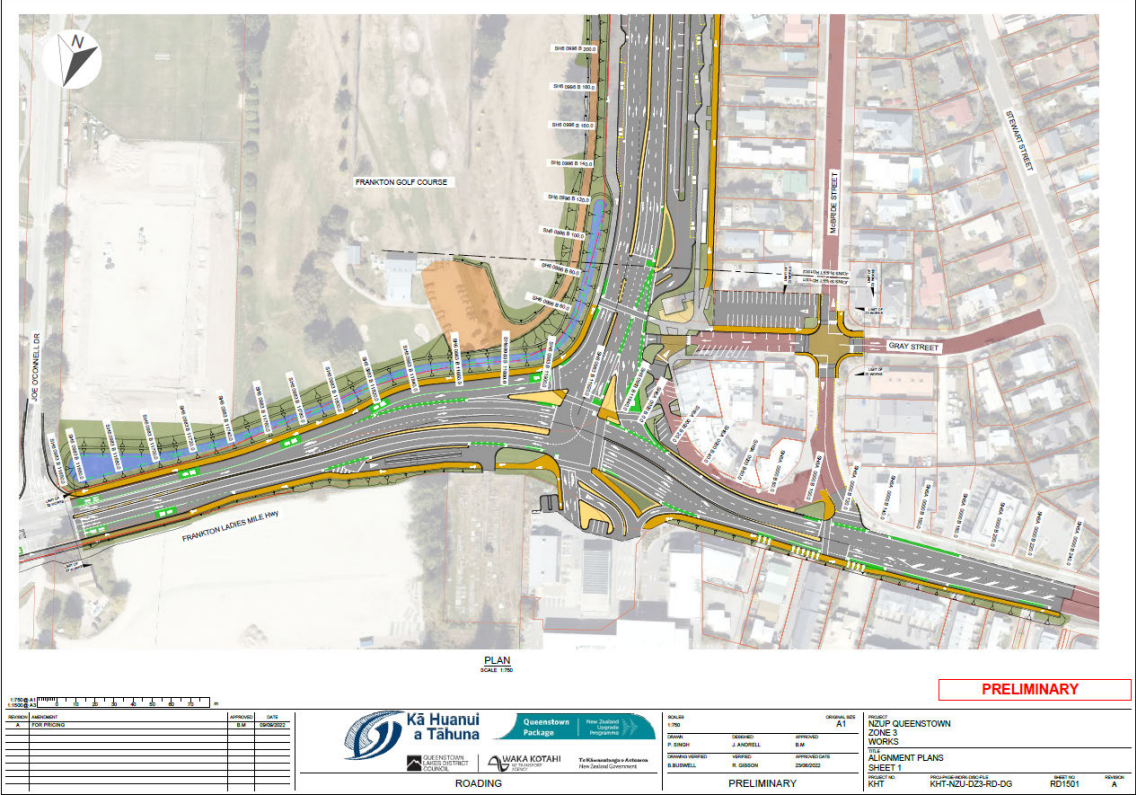


Figure 3-2: SH6 / SH6A Intersection improvements (Source: NZTA)



The transport assessment report for the Notice of Requirement to acquire land for the state highway improvements included a forecast of the level of service anticipated at the SH6 / SH6A intersection in 2028. The analysis indicated that the intersection would be operating at Level of Service (LOS) D in the morning peak and LOS E in the evening. Level of Service is a qualitative stratification of numerical performance measures to provide a simplified system to present road users' perceptions of the quality of service of a road or intersection. Table 3-2 shows the Austroads definitions for LOS C to LOS F.

Table 3-1: Level of Service Definitions (Source: Austroads)

Term	Definition
LOS C	In the zone of stable flow but most drivers are restricted to some extent in their freedom to select their desired speed and to manoeuvre within the traffic stream. The general level of comfort and convenience declines noticeably at this level.
LOS D	Close to the limit of stable flow and approaching unstable flow. All drivers are severely restricted in their freedom to select their desired speed and to manoeuvre within the traffic stream. The general level of comfort and convenience is poor, and small increases in traffic flow will generally cause operational problems.
LOS E	Traffic volumes are at or close to capacity, and there is virtually no freedom to select desired speeds or to manoeuvre within the traffic stream. Flow is unstable and minor disturbances within the traffic stream will cause breakdown.
LOS F	In the zone of forced flow, where the amount of traffic approaching the point under consideration exceeds that which can pass it. Flow breakdown occurs, and queuing and delays result.

The report notes that even with the proposed works, severe congestion could be expected beyond 2028 due to development in the immediate area (Ladies Mile and Southern Corridor) as well as continued growth in visitor numbers unless the public transport travel mode is increased. The report acknowledges that simply increasing capacity would not represent a good long-term solution and that there was a need to increase the mode share for active modes and public transport.

4 Long-term Planning Framework

4.1 Spatial Plan

Figure 4-1 shows the key spatial elements for the Wakatipu Basin within the QLDC Spatial Plan. It shows the primary metropolitan areas of Queenstown and Frankton, towns and future urban areas. The plan shows that growth is anticipated along the Southern Corridor with provision for new local centres at Coneburn and Homestead Bay.

Growth along the southern corridor will be supported with an enhanced public transport system. In the short term, this includes the introduction of a high frequency bus service between Queenstown and Frankton to provide a 'turn up and go' level of service. High frequency bus services will subsequently be extended to Ladies Mile and south to the Jack's Point / Homestead Bay.

A primary objective of the Project is to promote a modal shift from private vehicles by encouraging greater use of buses to travel to the Remarkables Ski Area. NZSki plans to increase the number of buses on its existing route between Queenstown and Remarkables Ski Area. It is also investigating the viability of operating new services along the Southern Corridor and in the longer term on the Eastern Corridor.



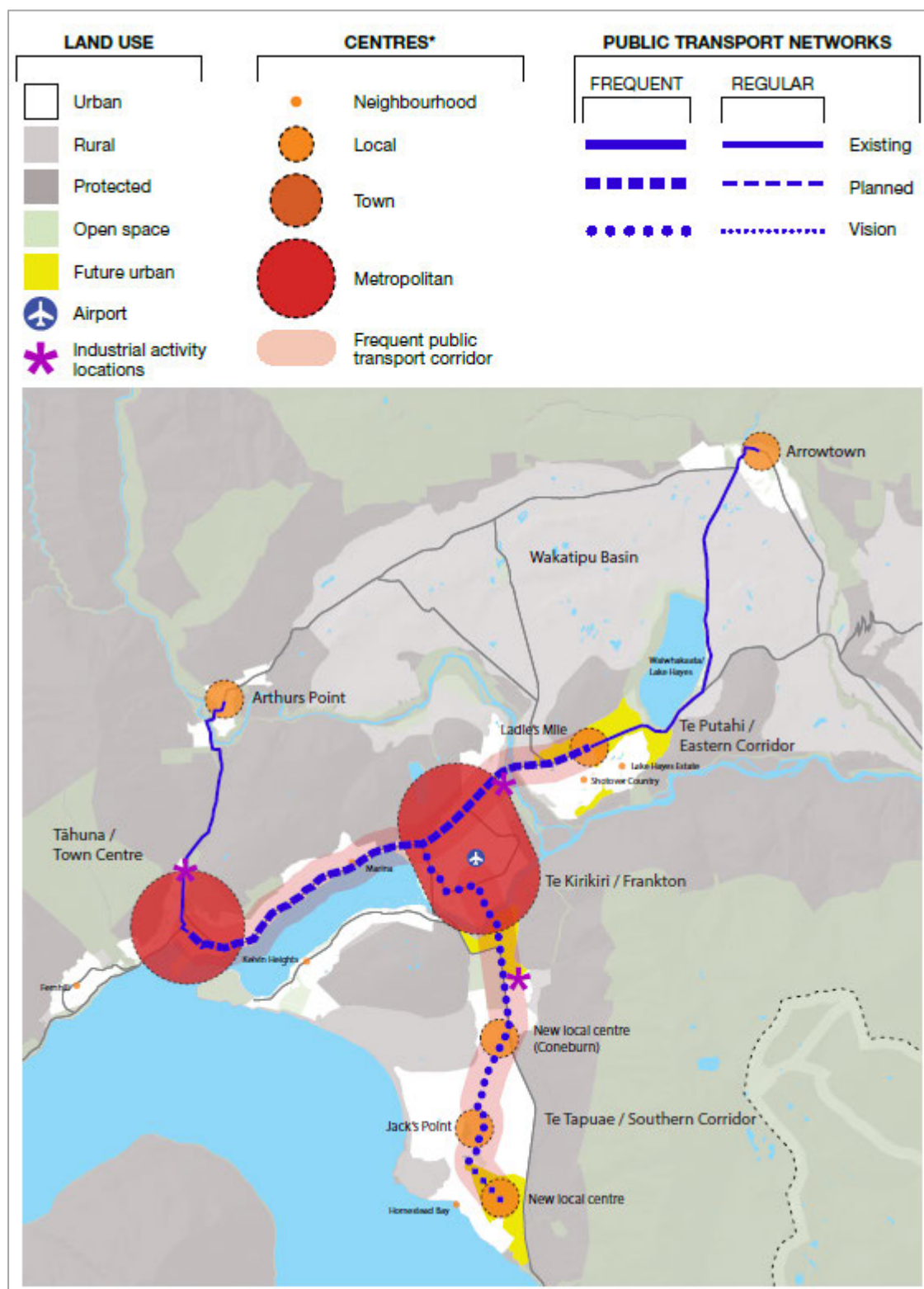


Figure 4-1: QLDC Spatial Plan - Wakatipu

4.2 Te Tapuae Southern Corridor Structure Plan

Te Tapuae Southern Corridor covers approximately 1,300 ha of land south of Kawarau River and includes the residential areas of Hanley's Farm, Jack's Point, and Homestead Bay. It represents a primary growth area for the district with an anticipated total development potential for over 9,000 houses. The access to the Remarkables is located towards the northern end of the Corridor.

QLDC has developed the Te Tapuae Southern Corridor Structure Plan (**TTSCSP**) to provide a framework for managing infrastructure development to support the community needs. The TTSCSP was adopted by Council in September 2025. Council initiated Plan Changes are anticipated in the future to achieve the objectives of the Structure Plan but have not yet occurred.

The TTSCSP proposal to service the Corridor revolves around reducing the number of single occupancy vehicles (cars) using Kawarau Falls Bridge because without action, the travel demands from Te Tapuae Southern Corridor (including Kelvin Heights and Kingston) north across the Kawarau Bridge are forecast to exceed the capacity of the current road and public transport services.

Achieving a reduction in vehicle volumes is proposed through a combination of providing alternative higher capacity and sustainable transport modes, providing more jobs and services in the Corridor so it becomes more self-sufficient, and implementing a Travel Demand Management programme.

Although the TTSCSP sets out short, medium and long term actions for the Southern Corridor, there is no confirmed funding for many of the improvements. Action Point 7 of the first three years of implementation includes construction of a roundabout at the Remarkables Ski Area Access Road with this being implemented by NZTA, ORC and QLDC.

NZSki will be monitoring the performance at the SH6 / Remarkables Ski Area Access Road intersection so that it can identify actions for improving safety and efficiency as well as informing decisions on the future configuration of the intersection.

5 Project Transport Effects

5.1 Existing Travel Patterns

The existing QLDC transport model is dated and does not provide the capability to model a range of public transport options or active modes. QLDC has commissioned a new transport model to reflect the changes in landuse across the district with capability to model a wide range of travel modes. Delivery of the new model is anticipated in early 2027. In the absence of a model, a high level assessment of the effects of ski field activity has been undertaken. However, it should be noted that it is not possible to distinguish between the effects generated by Coronet Ski Area and Remarkables Ski Area as both will contribute to increased movements on the transport network during the ski season.

Figure 5-1 shows the average daily winter and summer volumes³ recorded on the highway network in 2025. Within the Frankton area, the daily volumes are higher in the summer than during the winter. Traffic volumes on Frankton Road in the winter were similar to but lower than those recorded in the summer. South of the Kawarau River along the Southern Corridor, the winter volumes are higher than in the summer but the differences are modest.

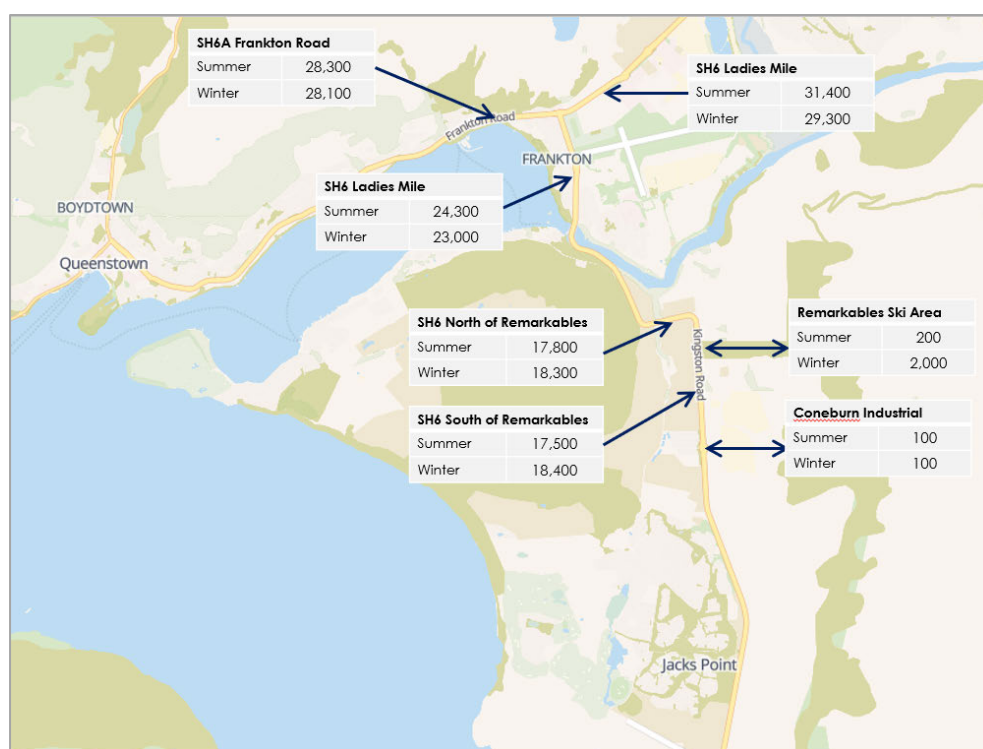


Figure 5-1: 2025 Summer and winter daily volumes

To provide greater context, Figure 5-2 shows the seasonal variation in daily traffic volumes recorded in 2025 on the state highway network within the Wakatipu Basin with the indicative daily traffic generation of the Remarkables Ski Areas in 2025 shown for comparison. Table 5-1 provides a comparison of the

³ Figure shows averages calculated for February and August

winter and summer traffic volumes with the annual average volumes. Daily traffic volumes in spring and autumn are below the annual average.

Within Frankton, the busiest period on the network is late summer with volumes on SH6 Ladies Mile reaching 31,400 vehicles per day in the busiest weeks of the summer. Traffic volumes on Frankton Road west of SH6 and on SH6 Kawarau Road were lower but exhibit similar seasonal variations.

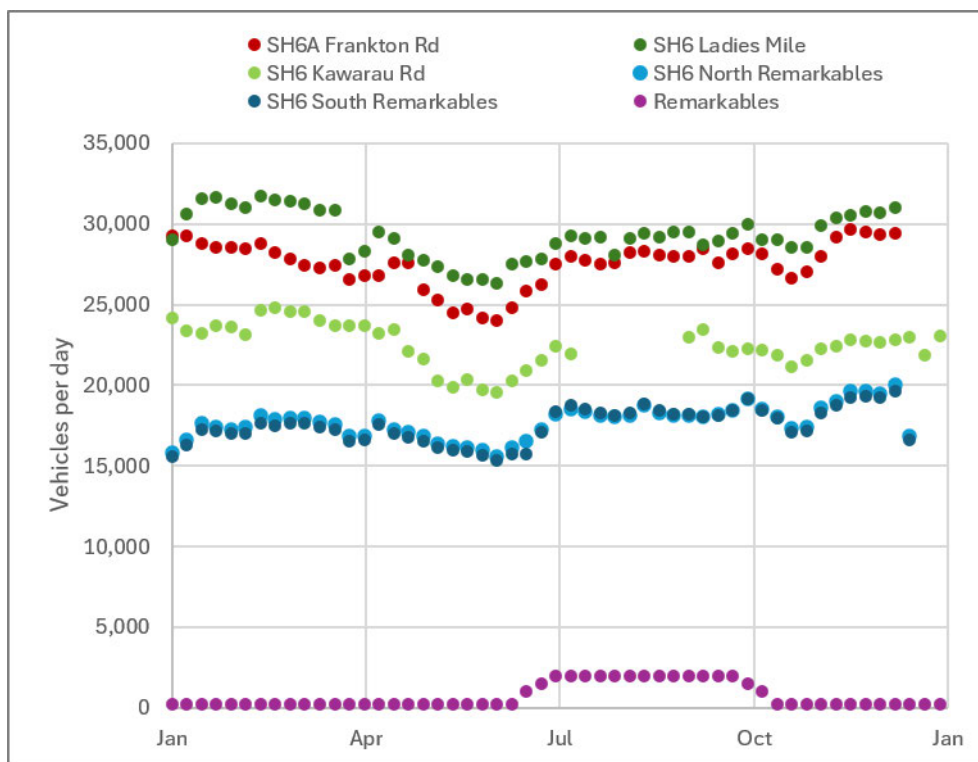


Figure 5-2: Seasonal variation in traffic volumes

Table 5-1: Comparison of winter and summer daily traffic volumes

Location	Summer	Average	Winter
SH6A Frankton Road	28,300	27,600	28,100
SH6 Ladies Mile	31,400	29,300	29,300
SH6 Kawarau Road	24,300	22,500	23,000
SH6 North of Remarkables	17,800	17,700	18,300
SH6 South of Remarkables	17,500	17,500	18,400

During the ski season, traffic volumes on SH6 Ladies Mile and Frankton Road were about 29,000 vpd and 28,000 vpd respectively and were similar to but higher than average volumes measured across the year.

Traffic volumes close to the Remarkables Ski Area Access Road exhibit a more noticeable increase in volumes during the ski season compared with volumes across the year. During the ski season, daily traffic volumes were about 500 vpd higher than the annual average on SH6 north of the Remarkables Ski Area Access Road which represents about 3% of the overall flow. There are only small differences in the traffic volumes recorded immediately to the north and south of the Remarkables Ski Area Access

Road because the count sites are closely spaced and because during the ski season, departing traffic initially travels south to the Coneburn roundabout before any Queenstown / Frankton traffic then turns to travel north. This movement pattern reflects the Temporary Traffic Management Plan that has been agreed with NZTA.

5.2 Future Traffic Generation

Table 5-1 provides a summary of the expected average daily traffic generation of the main activity centres along the Southern Corridor at full development based on a daily traffic generation rate of 6 vehicle movements per day per household for residential activity to reflect the fact that some movements would be local and not affect the state highway and also more travel being on public transport. Although the full level of currently approved development is expected to take 25 to 30 years, some areas such as Jack's Point and Hanley's Farm are already largely developed. The actual traffic generation may vary depending on the transport solutions provided for the Southern Corridor, this provides insight to the comparable demand.

Table 5-2: Indicative average daily traffic generation potential on Southern Corridor

Location	Households	Annual Average Daily Traffic Generation
Jack's Point	1,300	7,800
Hanley's Farm	2,200	13,200
Woolbrae	270	1,620
Woolsted Creek	100	600
Park Ridge	540	3,240
Homestead Bay	2,800	16,800
Coneburn	Industrial	900
Remarkables	Ski Area	900 ⁴

Although the Remarkables Ski Area could generate about 3,000 vehicle movements per day on the busiest days of the ski season once the Project is operational, it has very low traffic generation outside of the ski season compared with the residential development that is anticipated.

At a daily level, the Remarkables Ski Area could account for up to 6% of vehicle movements on the road network during the ski season with a negligible volume being generated outside the ski season. At an annual level, the Remarkables Ski Area could account for about 2% of all vehicle movements on the Southern Corridor.

Since the Remarkables Ski Area currently generates about 2,000 vpd on the busiest days of the ski season, the Project would contribute an additional 1,000 vpd on the busiest days but will not change the existing low level of traffic generation outside the ski season. The forecast growth in the annual average

⁴ Annualised to reflect 90 day ski season and 200 vpd average outside ski season

daily traffic volume represents a modest increase of about 250 vpd. This is comparable to the expected traffic generation of less than 40 dwellings compared with the current residential development rates reported by QLDC on the Southern Corridor of about 300 households per annum which contributes over 2,000 vpd per annum to the transport network.

The pattern of vehicle movements generated by the Remarkables Ski Area are generally in the opposite direction to commuter flows on the Southern Corridor at peak times because of its location outside the main employment centres. For example, on Kawarau Road the Remarkables Ski Area will generate southbound traffic in the morning with commuter traffic being northbound with this pattern reversing in the late afternoon. On Frankton Road and Ladies Mile, ski area traffic may contribute to some increase in local movement volumes in the same direction as commuter travel but based on the flows recorded by NZTA in 2025, the overall flows are expected to remain below the peak summer flows which are also expected to grow in the future.

6 NZSki Mitigation Actions

6.1 NZSki Bus Services

NZSki currently operates bus services between Queenstown and its ski areas at Remarkables and Coronet Peak. The number of services will be increased as part of the Project to enable more visitors to travel by bus rather than private vehicle. It is understood that NZSki could introduce new service routes if warranted by demand and also to increase travel mode choice. Potential new services routes could be provided for the Southern Corridor or the Eastern Corridor towards Arrowtown.

6.2 Travel Management Options

NZSki already implements controls at its car parks to reduce parking demands by encouraging visitors to share transport and increase average vehicle occupancy. With the proposed reductions in car park capacity at the upper car parks to accommodate additional buses and service infrastructure, NZSki will continue to implement minimum vehicle occupancy rates for the car parks to influence visitor travel choices.

The expansion of the lower car parks and provision of car park shuttle services forms part of the overall measures to encourage visitors to share vehicles to reduce travel demands.

Following consultation with NZTA, NZSki implements controls at the SH6 / Remarkables Ski Area Access Road intersection that restricts departure movements to left turn only during the ski season to prevent right turn egress across SH6. The operation of the controls will be monitored during the ski season with action taken to improve safety if necessary and efficiency where this is practical.

6.3 Proposed Conditions of Consent

The proposed resource consent conditions reflect the proportionately small traffic demand generated by the ski field (in context of the wider network) and reflect the uncertainty associated with the future configuration of the highway in relation to the provision of public transport services, potential second Kawarau Bridge, highway capacity and the effectiveness of any wide area travel demand management actions taken by QLDC or NZTA.

The TRANS.1 condition involves monitoring of SH6 / Remarkables Ski Area Access Road intersection performance to inform decisions on intersection improvements that may be required by TRANS.2.

Conditions TRANS.3, TRANS.4 and TRANS.5 relate to the Temporary Traffic Management Plan to ensure that the SH6 / Remarkables Ski Area Access Road intersection operates safely during the ski season until any improvements identified under TRANS.1 are implemented.

Conditions TRANS.6, TRANS.7 and TRANS.8 relate to the expanded parking areas that will be constructed at the base of the Remarkables Ski Area Access Road and will be required to support the shift from private vehicle to buses.

Conditions TRANS.9 to TRANS.13 relate to the Travel Demand and Parking Management Plan. The conditions set out the objectives of the plan, when it is required and how it will be maintained. The



objective of the plan is to ensure that NZSki takes appropriate actions to influence visitor travel choices with the overall goal of reducing travel demand from the ski field on the transport network.

The proposed conditions have been structured to allow NZSki to manage their forecast growth in vehicle movements and inform decisions on intersection improvements in an environment where the wider growth in highway volumes is outside their control.



7 Conclusion

Under the existing traffic environment:

- The Remarkables Ski Area makes a notable contribution to existing traffic volumes on the SH6 corridor during winter (ski) season only, and that relative contribution diminishes closer to Frankton.
- Outside of the ski season, the Remarkables Ski Area makes a negligible contribution to traffic volumes.
- The winter season is less critical than the summer season for operation of the transport network on SH6 and in Frankton, as traffic volumes are lower.

In the future:

- The Project is expected to increase the average daily traffic generation of the Remarkables Ski Area from 2,000 vpd to about 3,000 vpd. The growth in movements will be distributed to the north and south of the Ski Area. Growth to the north is expected to be about 700 vpd and will not occur until after the Project works are complete, that is, 2030.
- Annualised, the forecast increase in the Remarkables Ski Area traffic movements represents a very small proportion of the total anticipated traffic growth on the Southern Corridor. The Remarkables Ski Area could add 250 vpd by 2030 at an annualised level compared with more than 8,000 vpd over the same period from residential development along the Corridor.
- Such changes are not significant from a transport network planning perspective for the Southern Corridor, with transport network changes and upgrades to be driven primarily by other growth.
- Conditions of consent are proposed to promote greater use of buses to access the ski area and ensure that the SH6 / Remarkables Ski Area Access Road intersection operates safely.

This report provides supporting information to the ITA but does not change the conclusions with regards to effects management.





Appendix A Wakatipu Travel Patterns



A.1 State Highway 6 – Ladies Mile

Figure A-1 shows the average daily traffic volumes recorded on SH6 north-east of SH6A by year since 2018. It shows that apart from a dip in 2020 due to the COVID19 pandemic, daily flows have risen from about 25,000 vehicles per day (vpd) in 2018 to about 29,000 in 2025. The 90th and 98th percentile volumes provide an indication of traffic volumes in the busiest weeks of the year. In 2025, daily traffic volumes were around 32,000 vpd during the late summer which represents the busiest time of the year.



Figure A-1: Average traffic volumes on SH6 north-east of SH6A (Data Source: NZTA)

The seasonal variation in traffic volumes is shown in Figure A-2 by the changes in average daily volumes computed on a weekly basis. The highest average volumes of about 32,000 vpd were recorded in late summer with the lowest volumes of about 26,200 vpd occurring in May and early June prior to the start of the ski season. During the ski season which ran from mid June to mid September in 2025, daily traffic volumes on SH6 were about 29,000 vpd. This reflects average traffic volume conditions for the year as a whole.

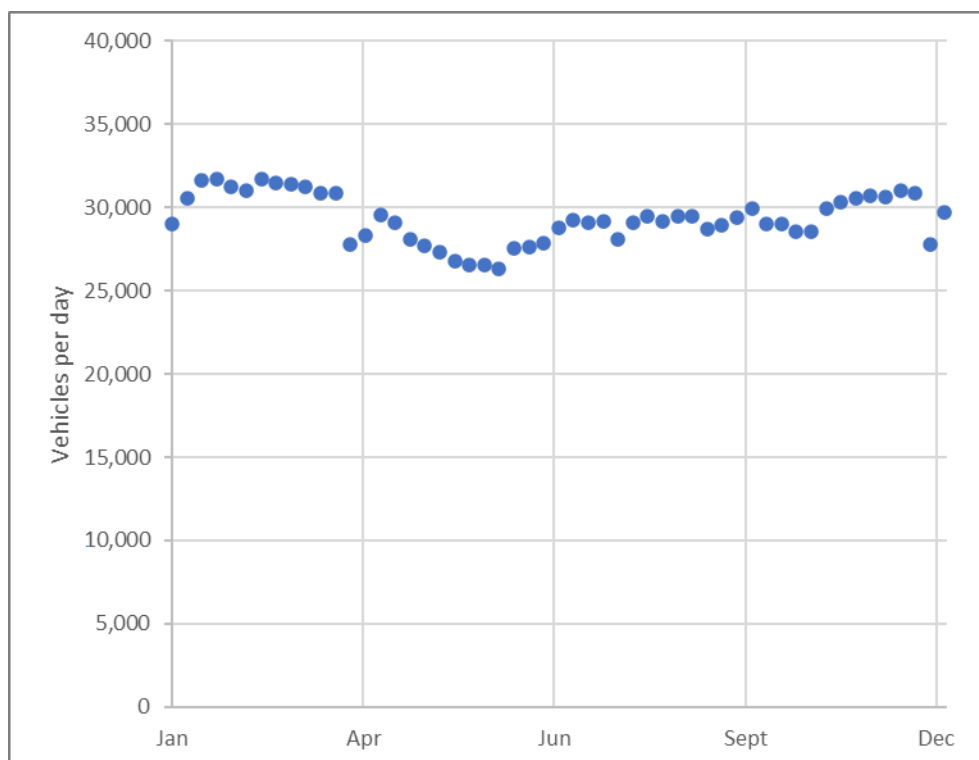
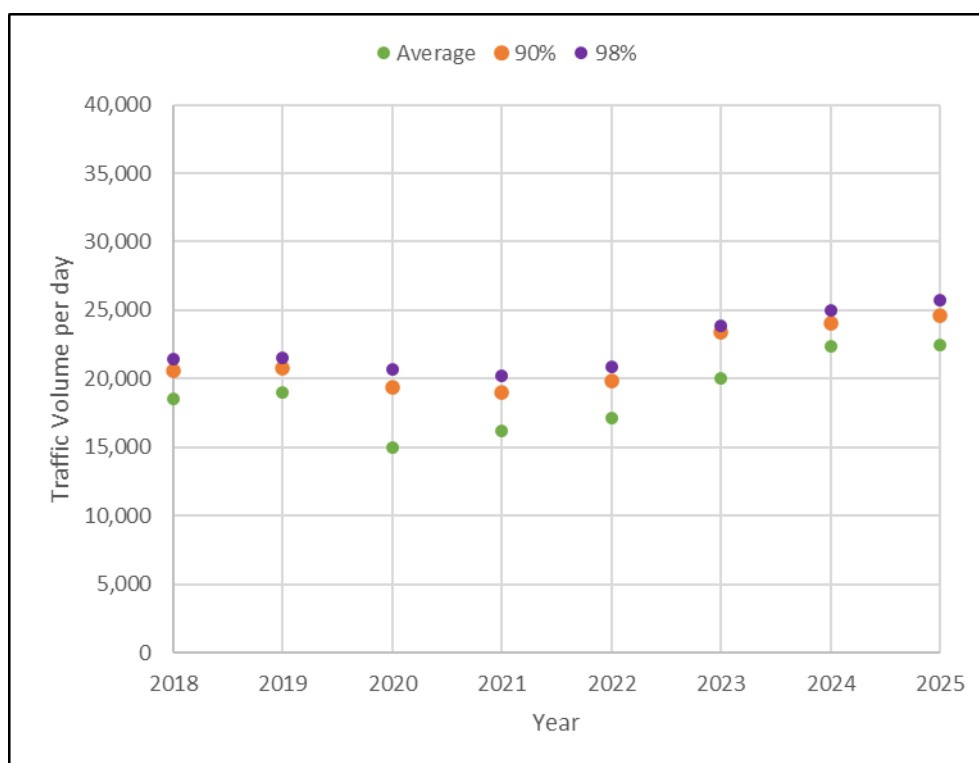


Figure A-2: Average daily volumes by week in 2025 (Data Source: NZTA)

A.2 State Highway 6 – Kawarau Road

Figure A-3 shows the average daily traffic volumes recorded by NZTA on SH6 south of the SH6A intersection. On an annual basis, the flows show a similar pattern to the flows on SH6 north-east of SH6A but are lower overall. Traffic volumes have risen from about 18,500 vpd in 2018 to about 22,500 vpd in 2025.

The daily traffic flows have a similar seasonal variation to those recorded on SH6 to the north (Figure A-4). While no data was recorded during the winter in 2025, reference to the volumes recorded in 2024 suggests that there would be no substantial variation in flows across that period. Again, the highest volumes occur in the summer with the winter ski season volumes being comparable to the average volumes measured across the year.



FigureA-3: Average daily traffic volumes on SH6 south of SH6A (Data Source: NZTA)

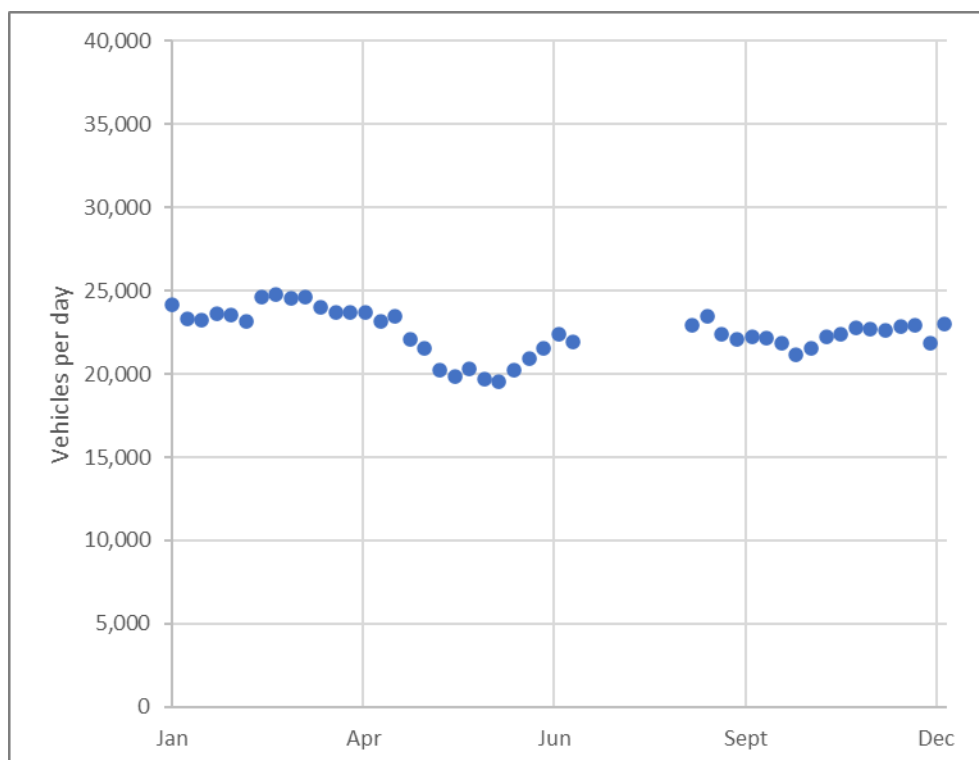


Figure A-4: Average daily traffic volumes by week in 2025 (Data Source: NZTA)

A.3 State Highway 6A – Frankton Road

The average daily traffic volumes recorded on SH6A west of the SH6 intersection are shown in Figure A-5. Volumes of nearly 27,000 vpd were recorded in 2018 and while this reduced following the COVID19 pandemic, the volume are now returned to a similar level and reached 27,500 vpd in 2025.

Figure A-6 shows that the seasonal variation in traffic volumes on SH6A has some similarity to the patterns recorded on SH6 in Frankton. The highest volumes were recorded in early summer with the lowest volumes in early winter. Again the traffic volumes in the ski season are similar to the average volumes measured across the year.



Figure A-5: Average daily traffic volumes on SH6A West of SH6 (Data Source: NZTA)

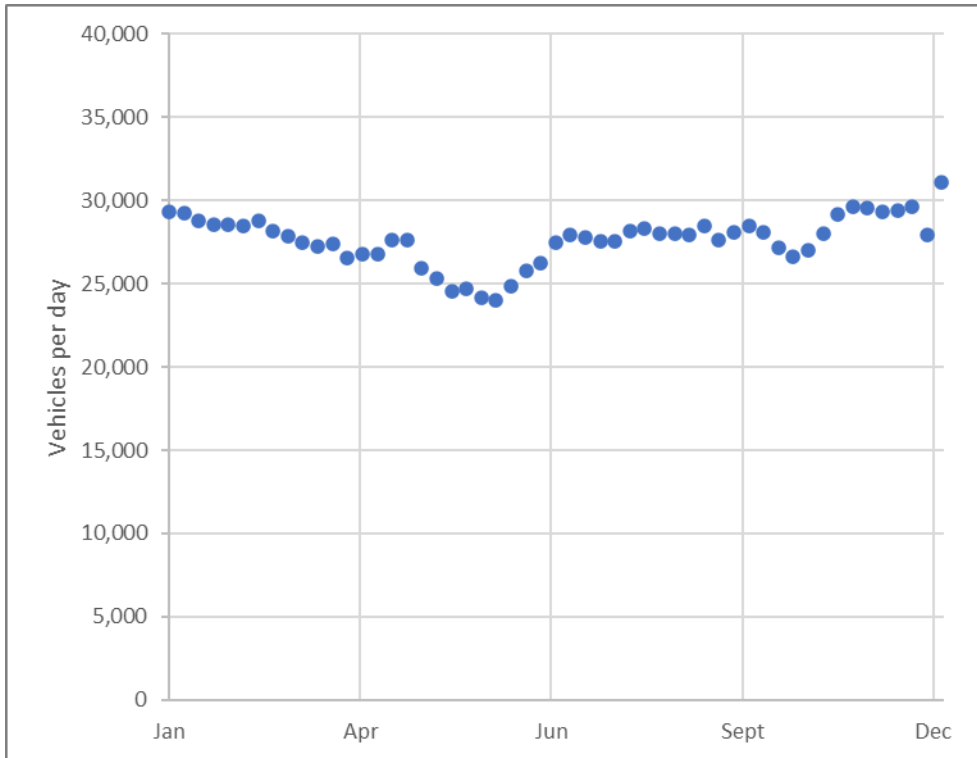


Figure A-6: Average daily volumes on SH6A by week in 2025 (Data source: NZTA)

A.4 SH6 South of Remarkables Ski Area

Figure A-7 shows the average daily traffic volumes recorded on SH6 south of the Remarkables Ski Area Access Road. It demonstrates that traffic volumes have been rising rapidly in recent years at more than 10% per annum. The seasonal variation in traffic volumes is shown in Figure A-8. During the ski season, the flows immediately to the south of the Remarkables Ski Area are very similar to those to the north because of the departure controls at the highway intersection. The traffic flows in this area are more strongly influenced by the Remarkables than in locations to the north with volumes being higher than during the summer. This effect is localised to the highway north of the Coneburn roundabout.



Figure A-7: Average daily volumes on SH6 south of Remarkables Ski Area (Data Source: NZTA)

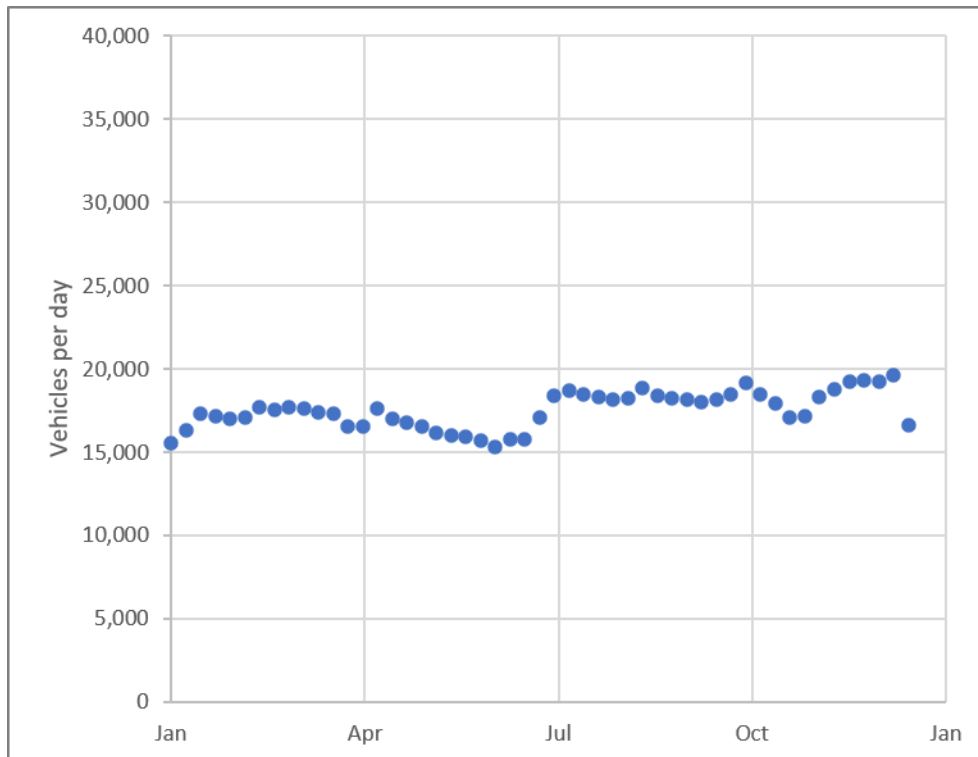


Figure A-8: Seasonal variation in traffic volumes on SH6 south of Remarkables Ski Area

A.5 SH6 / SH6A Intersection

Table A-1 shows the forecast turn count volumes at the SH6 / SH6A intersection from the existing QLDC transport model. In the morning peak hour, the dominant movement is from SH6 Ladies Mile into SH6A Frankton Road but there are high movement demands between the other state highway approaches. In the evening peak, the dominant movement is from Frankton Road to Ladies Mile but the 2039 forecast shows strong growth towards the south. Each of the modelled scenarios includes high movement volumes to and from the south on Kawarau Road.

Table A-1: Forecast turning movements at the SH6 / SH6A intersection (Source: QLDC transport model)

Approach	Destination	2027AM	2039AM	2027PM	2039PM
Frankton Rd	BP Corner	8	9	7	7
	Ladies Mile	306	350	582	690
	Kawarau Rd	188	211	355	702
BP Corner	Ladies Mile	6	8	20	26
	Kawarau Rd	3	4	12	22
	Frankton Road	6	8	17	19
Ladies Mile	Kawarau Rd	383	443	481	636
	Frankton Road	600	648	696	685
	BP Corner	23	27	19	23
Kawarau Rd	Frankton Road	368	557	368	467
	BP Corner	21	32	11	16
	Ladies Mile	485	677	452	525

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Appendix 3C: Further information response (Ecology)

Ref: 24043

1 July, 2026

C/O Kirsty O'Sullivan

NZSki Limited



RE: e3s 24043 – Remarkables Upgrade and Doolans Expansion EcIA EPA RFI Response

1 Purpose

The EPA has issued a request for further information (RFI) in relation to the NZSki Limited Remarkables Ski Area and Doolans Expansion Project. Information has been provided below in response to queries five through nine of the Fast Track EPA RFI. While e3Scientific is the primary author of this response, input has been provided by the project lead Entomologist Will Frost, and advisor John Marris, from Lincoln University regarding the response to the invertebrate related query.

2 Matters of the Request for Further Information

5. With reference to sub-clause (g), DoC has also noted a lack of detail in relation to the following potential effects of the proposal:

Vegetation and related ecosystems:

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

e3s response – The Terrestrial Ecology Impact Assessment (TEcIA) was attached in Part B (B.12) of the Substantive Application. The TEcIA utilises the EIANZ and DOC guidelines (Roper-Lindsay et al., 2018; Davis et al., 2016) for assessment of ecological significance and overall level of ecological effects. Determining the ecological significance is

achieved by assessing the site across multiple significance criteria, which is done using the Ecological District as the reference point and evident in the multiple references to the Ecological District, see Sections 5.2, and 6.1.1 of the TEcIA. One of the significance criteria is specifically Representativeness, for which all vegetation communities present within the study area have been assessed against, please refer to Table 9 of the TEcIA. Further, the assessment includes the value of faunal species and this is incorporated as an inherent part of the significance criteria assessment, please refer to Table 8 and Table 9 of the TEcIA, with attributed relevant weighting within relevant criterion.

The Ecological District was further incorporated into the determination of effects. All communities above 1,100m within the Ecological District were mapped. This mapping was used to provide a quantitative estimated magnitude of effect that the proposed development might have specifically relative to the Ecological District, as part of the assessment of effects; please refer to Figure 8 and Table 14 of the TEcIA.

Invertebrates

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

e3s response – Given the scope of TEcIAs and limitations in alpine sampling (discussed further below), invertebrate surveys are never expected to detect all invertebrate taxa. Consequently, given these standard limitations, a desktop review was completed to support fieldwork surveys. The primary focus for both surveys and desktop review, was upon groups of invertebrates that can be quantitatively assessed under the New Zealand Threat Classification System (NZTCS) and those that may be susceptible to environmental change as a result of behavioural or life cycles dependencies.

For the target Lepidoptera species, the sampling period of February-March was preferable, falling well within the flight periods for the majority of taxa. This is similarly reflected for Orthoptera and Coleoptera taxa, with work undertaken during periods of weather when these taxa are active. Due to the nature of unfavourable and unpredictable weather conditions in alpine zones, weather windows were maximised within periods of favourable weather. Noting that sampling generally cannot be

completed earlier or later due to extensive coverage of snow and variable wind and rain temperatures during spring and autumn months. It is acknowledged that there may be a small series of taxa which are under-represented by alpine sampling timeframes. However, as is common, this is dealt with via desktop review, with a larger range of additional taxa incorporated via desktop review, with a focus on identifying species with a threat classification greater than Not Threatened under the NZTCS and/or that are considered to be of ecological significance within the context of the Ecological District, and whose conservation may be at increased risk as a result of the project.

Specifically regarding cicada, *Maoricicada nigra* subsp. *frigida* and *Maoricicada otagoensis* subsp. *otagoensis* are recognised subspecies of the New Zealand endemic alpine cicada genus *Maoricicada*, known from the Otago alpine zone and could be present within the disturbance footprint. Initial taxonomic separation of these species was undertaken in the 1970s by morphology, acoustic characteristics, and geographic distributions, prior to the development of genetic analysis tools. While these taxa are taxonomically recognised, there is currently limited published evidence demonstrating that they represent Evolutionarily Significant Units (ESUs) or should be assessed as separate management units from their parent taxa. Furthermore, there has been no formal assessment of Cicadidae under the New Zealand Threat Classification System. Accordingly, these two species are considered distinct components of the indigenous alpine invertebrate fauna assemblages, as are many of the Not Threatened invertebrate species, however, are not assigned elevated ecological significance solely on the basis of their subspecies status.

Unlike other species that lack threat status, that were included within the TEcIA, *Maoricicada* are polyphagous and therefore the proposed disturbance is unlikely to have more than very low to low effect on the population. Therefore, the lack of a formal designation under the NZTCS does not warrant tentative elevation of a threat classification in the context of the project assessment.

Avifauna

A threatened avifauna species with potential to be affected but not recorded during field surveying is rock wren (*Xenicus gilviventris* – Nationally Endangered). Targeted surveying along the bottom of rocky bluffs and through boulderfields would be more likely to detect this species if they were present; as opposed the surveying undertaken. This species should be considered in the Terrestrial EIA. Construction of new access roads is mentioned in the Terrestrial EIA, but the potential indirect impacts of these roads are not addressed. These provide a track for predator access and there will likely be

an increased effect of introduced species, particularly feral cats which are known to use these access routes readily. Assessment of this increased risk is missing from the application.

e3s response – The avifauna fieldwork completed for the TEcIA included multiple field staff experienced in rock wren (*Xenicus gilviventris*) habitat, calls, and sighting. The primary method of identifying avifauna species was through 5MBCs and viewpoint surveys, however, additional extensive walking surveys were also conducted in boulder field habitat, specifically searching for presence of rock wren. Observed rockfield-boulderfield habitat lacked shrubland or isolated herbfield species often associated with suitable rock wren habitat and was particularly unstable being within active rock fall and avalanche paths, which limits vegetation growth and stable breeding and foraging habitat. Furthermore, there are no records of rock wren within the Remarkables Range or within the Remarkables Ecological District across any databases (eBird and iNaturalist) or published literature. Michelsen-Heath & Gaze (2007) identified the nearest historic or current population to be within the Eyre Mountains, separated by Lake Whakatipu, forming a natural barrier; also noting that populations east of the main divide are less prevalent with less than 2 % of all records being recorded within these easterly regions.

As there are no previous rock wren observations within the study area, nor wider Ecological District, and there were none observed during the extensive avifauna survey, rock wren are not stated within the TEcIA. It is noted that kea (*Nestor notabilis*), were also not observed during survey, however, as they are known to occur infrequently within the Remarkables Range and have large foraging ranges, they have therefore been included in the TEcIA.

There are already multiple unofficial formed tracks present from Gibbston Valley and Nevis Valleys into the Doolans. The addition of one track might see a minor increase in predation levels. Notwithstanding this, NZSki confirmed that, as part of their existing operations, they undertake regular pest management, including monitoring and management of feral cats. This pest management will be formalised further as part of its recently renewed concession for the Remarkables Ski Area, in which NZSki is committed to developing a Pest Control Plan to manage the distribution of pests within the Rastus Burn that are present as a result of, or exacerbated by, the activities authorised by its concession. NZSki is proposing to extend this Pest Control Plan into the Doolans Basin, as part of its expansion into this area. It is understood that this outcome is detailed in both the draft resource consent and concession conditions appended to

the substantive application (refer to Part H, Document H.02 Condition BIO.16 to BIO.19 and Document H.03 Special Conditions 48 to 54).

Wildlife Act Authority – Schedule 7 information requirements

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

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

Avifauna

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

e3s response – All avifauna queries relating to the Wildlife Act Authority – Schedule 7 have been responded to collectively under query eight below.

Lizards

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

e3s response – e3s acknowledges the concerns regarding the lack of salvage. The project herpetologist considers that the time and resources associated with salvaging and relocating 'Not Threatened' species (McCann's skink that numbers in the tens of millions), would be better allocated to research that will inform the management of more threatened lizard species in Otago.

Salvage and relocation of McCann's skinks from the project footprint would require a suitable release site where high survival of relocated skinks is guaranteed. No such site is available due to a release site needing to be devoid of both naturally occurring McCann's skinks and mice (that are a major predator of New Zealand skinks). It is not currently possible to reliably control mice on the mainland of New Zealand over a large enough area to benefit lizard populations, particularly in alpine environments. A predator-free offshore island or a mainland fenced sanctuary (that does not already

hold McCann's skinks) is not available within the distributional range of McCann's skinks.

The project herpetologist considers the current 'best practice' was not designed for lizards, is often not fit for purpose for New Zealand lizards, and, if applied incorrectly, can be detrimental or waste resources. The project herpetologist has formed this opinion after working on lizard mitigation projects across New Zealand for 16 years and is supported by other New Zealand herpetologists.

The project herpetologist notes that the LMP recommends alternative mitigation (being a reduction of suitable skink habitat within the earthworks footprint and reducing works to a suitable weather window). The purpose of these recommendations is to give any McCann's skink present the opportunity and incentive to occupy alternative habitats prior to works being undertaken, whilst acknowledging this is unlikely to be effective for all lizards present. It is expected that direct fatal, non-fatal and indirect impacts will occur. Should mitigation not be undertaken additional losses are expected to be incurred. The effects of both scenarios are addressed by the proposed compensation.

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

Avifauna

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

e3s response – All avifauna queries relating to the Wildlife Act Authority – Schedule 7 have been responded to collectively under query eight below.

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

Avifauna

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

remains insufficient. We acknowledge exact locations may not be known, but we expect a broad location for where they propose to move them to.

e3s response – NZSki have revised the need for inclusion of kārearea/eastern falcon (*Falco novaeseelandiae* subsp. *novaeseelandiae*) within the wildlife permit. A 200 m buffer from all works footprints will be surveyed by a Suitably Qualified and Experienced Person (SQEP) for the presence of potentially nesting kārearea. If a nest is identified a 200 m exclusion zone will be established around the location for all personnel and machinery. The exclusion will remain in place until the nest has either been identified to have failed due to natural causes or chicks fledge the nest. The suitability of the exclusion distance will be regularly reviewed by a SQEP for the safety of the birds and personnel. Consequently, eastern falcon will not need to be part of the Wildlife Act Authority.

New Zealand pipit/pīhoihoi (*Anthus novaeseelandiae* subsp. *novaeseelandiae*) are recorded to have a higher tolerance to disturbance with records of chick raising in close proximity to publicly maintained (mown) trails (Beauchamp, 2019). Further, breeding populations already occur within and adjacent to skifields (Coronet Peak and the Remarkables). Therefore, a 50 m exclusion around pipit nests will be suitable and monitored by a SQEP.

Figure 1 depicts the areas within 50 m of the disturbance footprint where suitable habitat is present (green). New Zealand pipit are in relatively low abundance within the Doolans Basin, as described within the TEcIA (e3Scientific, 2026c). Therefore, the presence of nesting individuals within the disturbance footprint and/or a 50 m surrounding this area is considered low. As noted in the reviewers comments, the exact locations where wildlife relocations will occur is not known. It is preferable that nests are not moved greater than a few metres from its origin, if at all, due to physical markers being important for birds to locate nests. Therefore, encouraging renesting of a new clutch is assessed as the most suitable alternative in the unlikely scenario of a nest being present, therefore the following mitigation methodology / steps are proposed to fulfill the queries seven to nine.



Figure 1: Pipit nesting habitat.

Step 1 - Prior to vegetation clearance or alteration (i.e. Step 2), a Suitably Qualified and Experienced Person (SQEP) will undertake a survey to identify any nests within the proposed disturbance footprint (see Figure 1) and the surrounding 50 m buffer. The nest survey will be completed within five days of proposed vegetation clearance or alteration. Where works are undertaken within five days of the survey and no nests are identified, works may proceed.

- a) **Step 2** – Below 1,700 m asl, in areas of suitable pipit habitat where no nests are identified during Step 1 and earthworks are scheduled to occur more than five days after the nest survey, the following vegetation reduction steps are proposed. These measures are intended to minimise the future risk of injury or mortality by removing suitable nesting habitat within the works footprint before egg laying occurs, thereby encouraging pipits to establish nests in adjacent, unaffected habitat. Vegetation will be reduced within the earthwork's footprint to a height of 20cm in places where suitable pipit nesting habitat overlaps with the earthworks footprint (hatched polygon in Figure 1).
- b) All work is to be undertaken as soon as able, immediately following the initial survey outlined in Step 1 (within five days).

- c) The area that is to be subject to vegetation clearance is to be clearly marked on site.
- d) Alternative vegetation reduction (for example scrub cutting) methodologies may be used if they are found to be more practical or efficient (in consultation with the Project Ornithologist/Ecologist).
- e) Alternatively to Step 2, Step 1 may be repeated by a SQEP in conjunction with other workflows, where the area of disturbance will be disturbed within five days of survey.

Following completion of the vegetation clearance, earthworks can occur within the cleared areas for the remainder of the construction season unless pipit nests are identified within the area after the vegetation clearance has occurred or extensive regrowth of tussock occurs that would result in the reestablishment of viable nesting habitat (characterised as natural tussock form and density, greater than 40cm in height).

Step 3 – If a nest is present within the earthworks footprint, the first action is to determine if it can be actively avoided through timing of works. If these avoidance measures are not possible the nest will be removed and eggs destroyed to encourage renesting outside of the disturbance footprint. The method in which the nest will be destroyed is as follows:

- a) The eggs will be collected, recorded (date, time, location, and number of eggs), transported in a protective and insulated casing, and candled to ascertain each egg's relative development.
- b) If the embryo is observed to be less than 80% developed (has not developed a nervous system yet), the egg will be placed in a standard freezer (-18°C) for 24 hours (Leary, et al., 2020).
- c) If the embryo is observed to be more than 80% developed – the egg will be destroyed via controlled and instantaneous crushing.
- d) All dispatched eggs are then to be handed to DOC for research, cultural, or storage purposes.

Step 4 – Where nests are present outside the disturbance footprint but within the 50 m buffer, monitoring of the nest will be undertaken by a SQEP, as the pair may be tolerant of nearby disturbance and may therefore be unaffected by disturbance within 50 m of their nest location. If the nest is observed to be abandoned (more than six hours of inactivity) the SQEP will record the date, time, location, number of eggs, and the distance from nearest point of disturbance. The eggs will then be collected and dispatched as per Step 3 above.

If disturbance within the works footprint is ongoing, does not cease for more than 5 days or expand in its extent and a pipit establishes a nest within 50 m of the disturbance extent no action is required to undertaken.

Step 5 – All losses of eggs will be recorded and need to be retrospectively compensated for.

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

See response to Query eight above.



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Appendix 3D: Further information response (Climate Change)

Memorandum

To Environmental Protection Authority

From Ross Lawrence, NZSki

Re: Request for Further Information FTAAQ-2605-1236

Climate Change Resilience and the Remarkables Ski Area
Upgrades and the Doolans Expansion Project

Introduction

In relation to the sought concession for the Remarkables Ski Area Upgrade and Doolans Expansion Project (“**the Project**”), the Environmental Protection Authority (“**EPA**”) requested the following further information from NZSki Limited (“**NZSki**”) under section 46(2) of the Fast-track Approvals Act (“**FTAA**”) in a letter dated 4 June 2026. This letter said:

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

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

- a. *With reference to sub-clause (d) - Information addressing Ski-fields Policy 3.25.2 of the Otago Conservation Management Strategy, which requires the*

application of a precautionary approach ... the likely longevity of the field in the face of climate change, and any appropriate land remediation and facility removal costs should the ski field cease to operate; and

- b. With reference to sub-clause (g) - Information addressing the potential climate change effects on the land and its conservation values should climate change make the activity unviable in the future.*

NZSki is the operator of three ski areas in the South Island, and it is aware of the potential risks that a warming climate and increasing snow lines has on the viability of its existing and future operations. Such matters influence NZSki's long term strategic planning and investment across its ski areas, including decisions such as to advance the proposed Remarkables Ski Area Upgrades and Doolans Expansion Project.

In response to the request by the EPA, the following memo will:

1. Provide an overview of the scientific evidence that has supported NZSki's decision to advance the Project;
2. Provide an overview of snow accumulation data spanning 40 years, as recorded by NZSki at the Remarkables Ski Area;
3. Provide relevant and applicable examples of recent technological advancements that have improved the reliability and longevity of the winter ski season elsewhere; and
4. Summarise the Project's proposed land remediation and facility removal requirements.

This memorandum responds directly to, and addresses the comments in, the request for further information that "*Climate change data and assessment supporting an expansion into the Doolans for the purpose of operating a ski area over the proposed term of the next 40 years, in the face of climate change, is absent*".

The Current State of Knowledge

In 2012, Hendrikx et al. published research on the potential effects of climate change on seasonal snow in New Zealand. The authors present their findings in two parts, with the first providing a nationwide assessment, and the second focusing on implications for the ski industry. Part II also includes an analysis of the ski industry's ability to mitigate or adapt to

climate change through technological intervention. Both papers are attached to this memorandum in Appendix A. Although this research is now almost 15 years old, its overall findings remain relevant. The papers are the most current assessments for climate change impacts on snow in New Zealand.

The authors' projections indicate a widespread decline in New Zealand's snowpack across all elevations under all climate change scenarios by the 2040s and 2090s. Key snow metrics (including snow water equivalent¹ ("**SWE**"), snow duration, and the fraction of precipitation falling as snow) all show consistent decreases, with the largest relative impacts occurring at lower elevations and in regions east and north of the Main Divide (2012, 613-614).

Additionally, Hendrikx et al. find that a rising snowline is also likely, with the elevations that support snow cover for at least three months of the year projected to increase by 0 to 200 m by the 2040s and 150 to 450 m by the 2090s (2012, 614).

Notably, whilst high elevations may experience increases in maximum SWE, this finding is of limited significance as such elevations (those greater than 2900 m) cover less than 0.01% of New Zealand's land area (2012, 615).

Hendrikx et al. conclude part I by outlining that the result of their modelling is aligned with their understanding and global knowledge of snow process – there are predicted to be relatively larger declines of SWE at lower elevations and potential increases of SWE at the highest elevations (2012, 615).

In part II Hendrikx & Hreinsson go on to examine the possibility that the ski industry in New Zealand may be able to make up the short fall in seasonal snow through technological measures (2012). The authors reiterate that climate change will reduce the natural snow available at all the sites considered in this study, with the number of snow-days negatively correlating to the elevation of the site (2012, 628). However, the analysis undertaken in this part demonstrates that, even under worst-case scenario, snowmaking is viable at all 10 examined sites into the 2090s, including at The Remarkables (2012, 629). Notably, areas located above 1650 m in elevation will experience more gradual changes as compared to areas lower in elevation. As such, ski areas such as The Remarkables will retain a

¹ Used as the rate of snow accumulation.

consistent winter snow season (though possibly shortened), with substantial and reliable snow depths suitable for snow-based activities (2012, 628).

Furthermore, Hendrikx & Hreinsson find that snowmaking can make-up the deficit in the natural snow, increasing the number of snow-days up to 1990s levels at all sites considered in this study (2012, 629). They do note a caveat that the analysis adopts minimum snow levels for operation. Additionally, although it remains possible at all sites, potential snow-making hours also decrease (again negatively correlated with elevation).

Overall, the authors summarise how their research highlights the importance of considering technological advancements (in terms of the ability to make snow) when considering climate change impacts on ski areas. Their analysis draws on similar conclusions made globally - adaptation to climate change (in this case being technological advancements) will be key to retaining operations at ski areas situated at lower elevations (2012, 629).

The Doolans Basin

Climate change will certainly impact the level of seasonal snow seen in New Zealand, however, both altitude and latitude are significant factors in shaping how this difference is felt. Overall, the findings presented by Hendrikx & Hreinsson indicate that The Remarkables ski area benefits from high altitude and favourable latitude (2012). Furthermore, the south-east/south-facing aspect of The Remarkables means that the sun does not reach many of the faces with direct sunlight. Each of these characteristics work to support greater snow retention and facilitate reliable winter operation as the climate warms. Supporting this assertion, Hendrikx & Hreinsson find that for the location representative of The Remarkables, even under the most severe scenarios evaluated it is likely that the area will have snow into the 2090s (2012, 627; Table 4).

For the reasons outlined above, the expansion into the Doolans Basin, with its higher altitude and south easterly aspect are central to the project rationale. Additionally, the Doolans Basin operates as a snow catchment, able to hold greater amounts of snow for longer periods. This is due to the prevailing west to north-west weather through The Remarkables, which constantly transports snow from the Rastus Burn basin to the Doolans.

NZSki also note that the basin contains sufficient water to enable snow making activities to occur, whilst maintaining key residual flows to avoid adverse downstream effects from water

take. These aspects of the Doolans Basin will enhance the resilience of the ski field as climate and weather patterns change and will secure the longevity of the ski field for the duration of the sought concession.

Tracking Snowfall in the Remarkables Ski Area

NZSki does not hold records for snow accumulation in The Doolans basin specifically but has kept records for The Remarkables Ski Area since its inception in 1985. Figure 1 below sets out this data and demonstrates an overall upwards trend in annual snow accumulation.

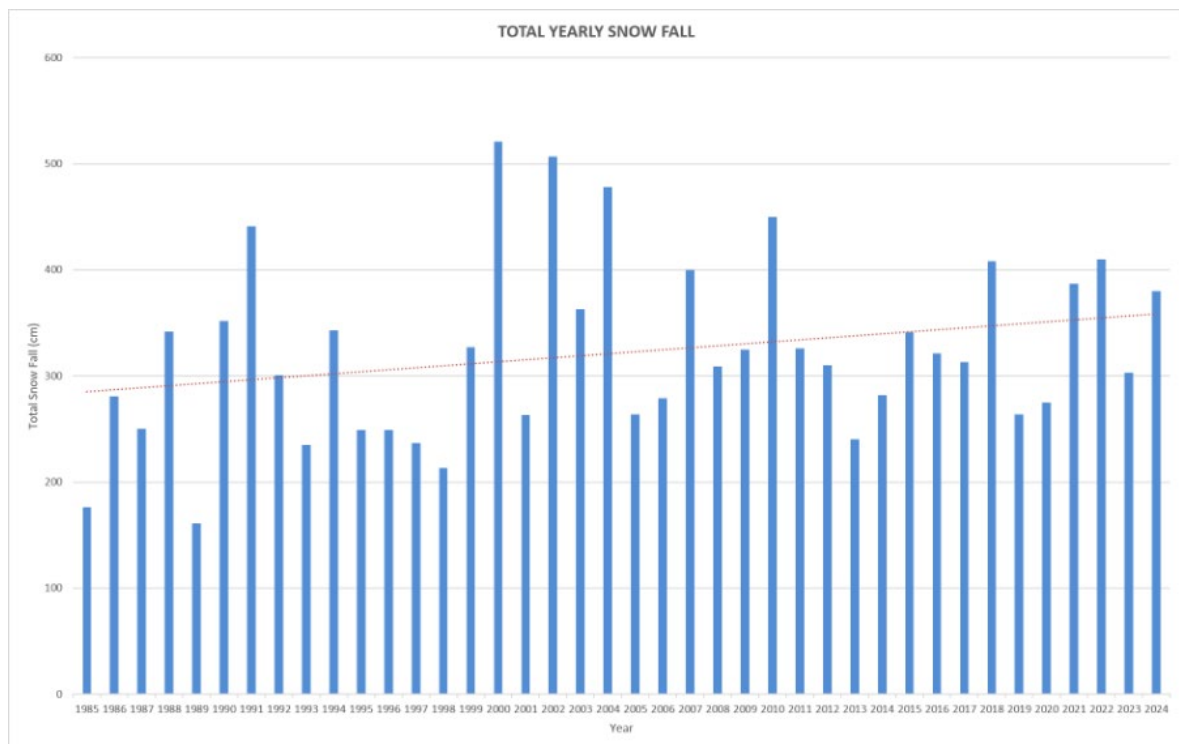


Figure 1: Snow accumulation at the Remarkables Ski Area - 1995 to 2024.

As illustrated by the graph above, NZSki is well accustomed to variations in yearly snowfall. This data combined with the findings of Hendrikx & Hreinsson (2012) provide reasonable confidence that NZSki will be able to adapt to any decreases in seasonal snow - particularly given any change is to be gradual at these elevations. Mitigating factors such as snow-making technology will assist in retaining suitable conditions for snow-based activities, with expansion into the Doolans Basin further securing resilience and longevity of the ski area overall.

Technological Advancements and Improved Reliability and Longevity

Advancements in snowmaking technology will continue to support the longevity of the Remarkables Ski Field by improving the efficiency of snow making and broadening the weather conditions under which snow can be produced and distributed. Advancements in snow making technology to date include:

- A modern snow producer is capable of producing 50% more snow than the technology of 15-20 years ago in New Zealand alpine ski field conditions.
- The start-up temperatures for a modern snow producer are now -1.5°C wet bulb whereas 15-20 years ago guns would not produce until -2.5°C and the product would be quite wet.
- Modern snow making creates light and dry real snow and makes for amazing trail skiing, which can be refreshed regularly with snowmaking to provide a great skier experience.
- This modern technology now uses 15- 20% less power per m³ of snow than the older snow making guns, and the efficiency of newer systems continues to improve.
- No two winter seasons are alike and snow making systems are designed to be reliable under a broad range of weather conditions, ensuring they can continue to operate in a variety of climate conditions.
- Based on data from over 100,000 snow producers worldwide, Technoalpin (the provider for NZSki's snow making technology) is confident that technology will keep up with current trends in climate change well into the future.
- Various ski industry suppliers are now refining a snow making 'factory' which utilises refrigeration techniques to produce snow /ice flakes regardless of the temperatures. These units are now available commercially and are in place in 2 NZ ski resorts producing up to 1,000m³ of snow per day each. NZSki has one in place at Coronet Peak and is already benefiting from the early season reliability of the product to accurately determine opening day each season. In most cases, natural refrigerants can be used to produce snow in an even more environmentally friendly, energy-efficient way. Refrigerant levels remain very low thanks to continuous innovation.

Advancements in snow making technology will therefore continue to support the longevity of alpine ski fields, including the Doolans Basin expansion, in the face of changing climate conditions.

Ceasing of Operations

NZSki's commitment to delivering high-quality snow experiences now and into the future sits at the core of its business values. The company has established a strong reputation for the consistent renewal and upgrade of infrastructure across all its operations. NZSki actively strives to remain at the forefront of innovation and sustainability, with a focus on enhancing the natural environment while delivering a product that meets and exceeds expectations.

Where questions have arisen regarding the remediation of sites altered under NZSki's concessions, the company's accountability and responsibility for reinstatement are clear and demonstrable. NZSki consistently exemplifies best practice in restoring the natural landscape, with a proven track record of returning sites to at least their original condition, and in some cases enhancing them as part of the remediation process.

NZSki anticipates the longevity of the ski area will extend well past the 40-year term of concession sought. However, in the unlikely event that the ski area should cease to operate by the end of the concession term, proposed Special Condition 102 of Schedule 3 of the Proposed Concession Document addresses land remediation and facility removal actions following termination or expiry of the concession in a manner that is consistent with other similar concession agreements ensuring the conservation values of the land will be appropriately protected following cessation of the activity.

Proposed Condition 102 requires NZSki to undertake required remediation at their cost. Specifically, condition 20.4 (proposed by Special Condition 102) requires that, following termination or expiry of the concession:

- The Concessionaire must remove any specified structures and other improvements on the Land if given written notice by the Grantor to do so.
- All above ground specified structures and other improvements must be removed to ground level unless otherwise agreed.
- Removal must occur within the time specified by the Grantor.

- The Concessionaire is to make good any damage and leave the Land and other public conservation land affected by the removal in a clean and tidy condition and replant the affected Land with indigenous vegetation of a similar abundance and diversity as that which existed generally in the vicinity prior to the structures or improvements being installed.¹

NZSki notes that these conditions are wholly consistent with NZSki's existing (and recently renewed) Remarkables Ski Area concession.

Conclusion

The evidence developed by Hendrikx et al. (2012) and Hendrikx & Hreinsson (2012) confirms that climate change will result in a reduction in natural snow availability across New Zealand over time, with the most pronounced impacts occurring at lower elevations. However, the research also demonstrates that high-altitude ski areas are comparatively well-positioned to retain viable snow conditions into the long term, particularly when supported by technological intervention. As such, the characteristics of The Remarkables Ski Area demonstrate the long-term reliability that can be gained by an expansion into the Doolans Basin. Its elevation, southerly aspect, and natural snow catchment benefits contribute to strong natural snow retention. Collectively, these factors significantly enhance the resilience of the ski area in the face of a changing climate.

In parallel, long-term snowfall records demonstrate that NZSki has successfully operated within a highly variable snow environment for decades. This operational experience, combined with ongoing investment in infrastructure and adaptive technologies, provides confidence in NZSki's ability to respond effectively to future climatic variability.

Overall, the evidence supports the conclusion that, with the implementation of technological measures and strategic expansion into the more resilient terrain of the basin, The Remarkables Ski Area can continue to provide reliable snow activities for future generations to enjoy.

Notes on the Author

Ross Lawrence is a respected, trusted, and highly knowledgeable figure within the ski industry. Over a distinguished 40-year career (17 of those years as Manager of The

Remarkables Ski Area until his retirement in 2025) he demonstrated strong leadership, overseeing and driving significant growth and development at the mountain. Widely regarded for his expertise, Ross remains deeply connected to the industry and retains a genuine passion for all things snow.

In the 2025 King's Birthday Honours, he was appointed a Member of the New Zealand Order of Merit in recognition of his extensive services to the ski industry.

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