

Before the Expert Panel

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by NZSki Limited to 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

**Memorandum of Counsel on behalf of
NZSki Limited**

Dated: 25 September 2026

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MAY IT PLEASE THE EXPERT PANEL

Introduction

1. This Memorandum of Counsel is filed on behalf of NZSki Limited (**NZSki**) following the Remarkables Ski Area Upgrades and Doolans Expansion Project (**Project**) Overview Conference held on 22 September 2026.
2. During the Overview Conference the Expert Panel invited NZSki to make further comments on the identification of adjacent landowners.

The Fast Track Approvals Act 2024

3. The Fast Track Approvals Act 2024 (**FTA**) refers to *adjacent land* at Schedule 5, Clause 5(1)(d) and at Section 53(2).
4. Schedule 5(1)(d) requires a resource consent application to include the full name and address of:
 - (a) *“each owner of the site and of land adjacent to the site”*; and
 - (b) *“each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry”*.
5. Section 53(2) provides that for a substantive application the Expert Panel must invite comments from the following groups (among others):
 - (a) *“the owners of the land to which the substantive application relates and the land adjacent to that land”*; and
 - (b) *“the occupiers of the land to which the substantive application relates and the land adjacent to that land unless, after reasonable inquiry, an occupier cannot be identified.”*
6. The Environmental Protection Authority (**EPA**) has published guidance material on identifying adjacent land under the FTA. That guidance provides that adjacent land *“can be land that is near or next to land to which the substantive application relates”*. It could include:
 - (a) *“Land that has a common boundary or is contiguous with the application land”*; and
 - (b) *“Land that is close enough to be considered to form part of the context of the application land...This could be land that is not contiguous but is directly across from, or separated by, a road, rail corridor or watercourse”*.

7. The term adjacent land is not defined, and is to be determined by the Expert Panel on the facts of the application.

The Substantive Application

8. The Substantive Application lists Adjacent Landowners at Part I.02. The Substantive Application sought to follow the EPA Guidance as closely as possible, whilst keeping consistent with the purpose of the FTA.
9. The Substantive Application therefore identified land that has a common boundary or is contiguous with the application land, where that land is near to the Project.
10. The majority of the land parcels comprising of the Remarkables Conservation Area are large, and therefore not all parcels have been included where a common legal boundary is shared. NZSki has taken a geographical distance approach to avoid capturing land well beyond any ambit of effect. This approach is consistent with the purpose of the FTA, and has been recognised in other decisions made under the FTA.¹
11. The land and the development surrounding the transit hub differs, and this therefore necessitated a different approach. The land parcels are significantly smaller, and the development confined. Only parcels directly adjoining or near to the parcels comprising of the Project Site were identified in the Substantive Application

Additional Information

12. In order to best assist the Expert Panel NZSki has provided updated maps and landowner information at **Annexure A** to this Memorandum.
13. Map I02A.1 provided at Annexure A identifies the landowners of additional parcels within the Remarkables Conservation Area (Parcels A – F). NZSki does not consider those parcels to be near to the land to which the application relates nor to form part of the context of the application land. In accordance with the EPA guidance and decisions of prior Expert Panels, details of those parcels were not included within the Substantive Application.
14. In addition, Map 102A.2 provided at Annexure A identifies landowners in the general vicinity of the transit hub. NZSki now recognises that the parcel identified as Parcel L on Map 102A.2 should have been included in the list of adjacent landowners in the Substantive Application as the landowners utilise the Remarkables Ski Field Access Road for access and therefore an effect may be felt. Likewise, the parcels identified as Parcel P, Parcel R and Parcel U are near to the Project Site.

¹ Port of Auckland Project, Expert Panel Decision, 21 August 2025 at [78].

15. Additional landowner information is now provided in the event that the Expert Panel wishes to exercise its discretion under Section 53 of the FTA and invite comments from the landowners of Parcels L, P, R and U.

Dated 25 September 2026

A handwritten signature in blue ink, appearing to read 'Joshua Leckie'.

Joshua Leckie and Charlotte Coyle
Counsel for NZSki Limited

ANNEXURE A

I.02 Original List of Adjacent Landowners

Legal Owners	Title Reference	Legal Description	Address (if applicable)
The Crown	-	Section 10 Block V Coneburn	-
QTN Farm Limited	203506	Lot 4 DP 349682	505 Chard Road, Gibbston, Queenstown
Remarkables Park Stud Limited	203505	Lot 2 DP 349682	-
Remarkables Park Stud Limited	203505	Lot 1 DP 349682	-
Kim Maree Boyd and William Irvine Boyd	3198	Lot 1 DP 300643	249 Kingston Road, Kawarau Falls
James Bartholomew Hennessey	926518	Lot 1 DP 545527	247 Kingston Road, Kawarau Falls and 247A Kingston Road, Kawarau Falls
Spencer Michael Mee	OT5B/518	Section 39 Block XII Coneburn SD	38 Boyd Road, Kawarau Falls
Cowan Corporate Trustee Limited, James Patrick Cowan, Maree Rita Cowan	926517	Lot 2 DP 545527	-
Mark Desmond Turner, Rebecca Jeanne Turner, Sandra May Turner	7816	Lot 3 DP 301946	216 Remarkables Ski Field Access Road, Kawarau Falls
Neil Thomas McDonald	990741	Lot 1 DP 560833	7 and 10 Stoney Creek Lane, Kawarau Falls
Grant Hylton Hensman, Noel Thomas van Wichen	638709	Lot 1 DP 471143	4 and 6 Stoney Creek Lane, Kawarau Falls
Banco Trustees Limited, Fraser James Mackenzie	OT17B/838	Lot 1 DP 25350	83 Stoney Creek Lane, Kawarau Falls
Karen Elizabeth Hanson, Garret Karl Pasquale	845448	Lot 3 DP 526483	86 Stoney Creek Lane, Kawarau Falls

Legal Owners	Title Reference	Legal Description	Address (if applicable)
Russell Cairns Reddell, Joymarie Ruth White	1208421	Lot 2 DP 610302	88 Stoney Creek Lane, Kawarau
Dickson Stewart Jardine, Jillian Frances Jardine, Phillip John Stevenson	1046657	Lot 1 DP 573262	-
Grant Hylton Hensman, Noel Thomas van Wichen	638709	Lot 1 DP 471143	-
David Lee, Diana Sue	7814	Lot 1 DP 301946	-

Map I02A.1 – Ski Field Expansion Neighbours

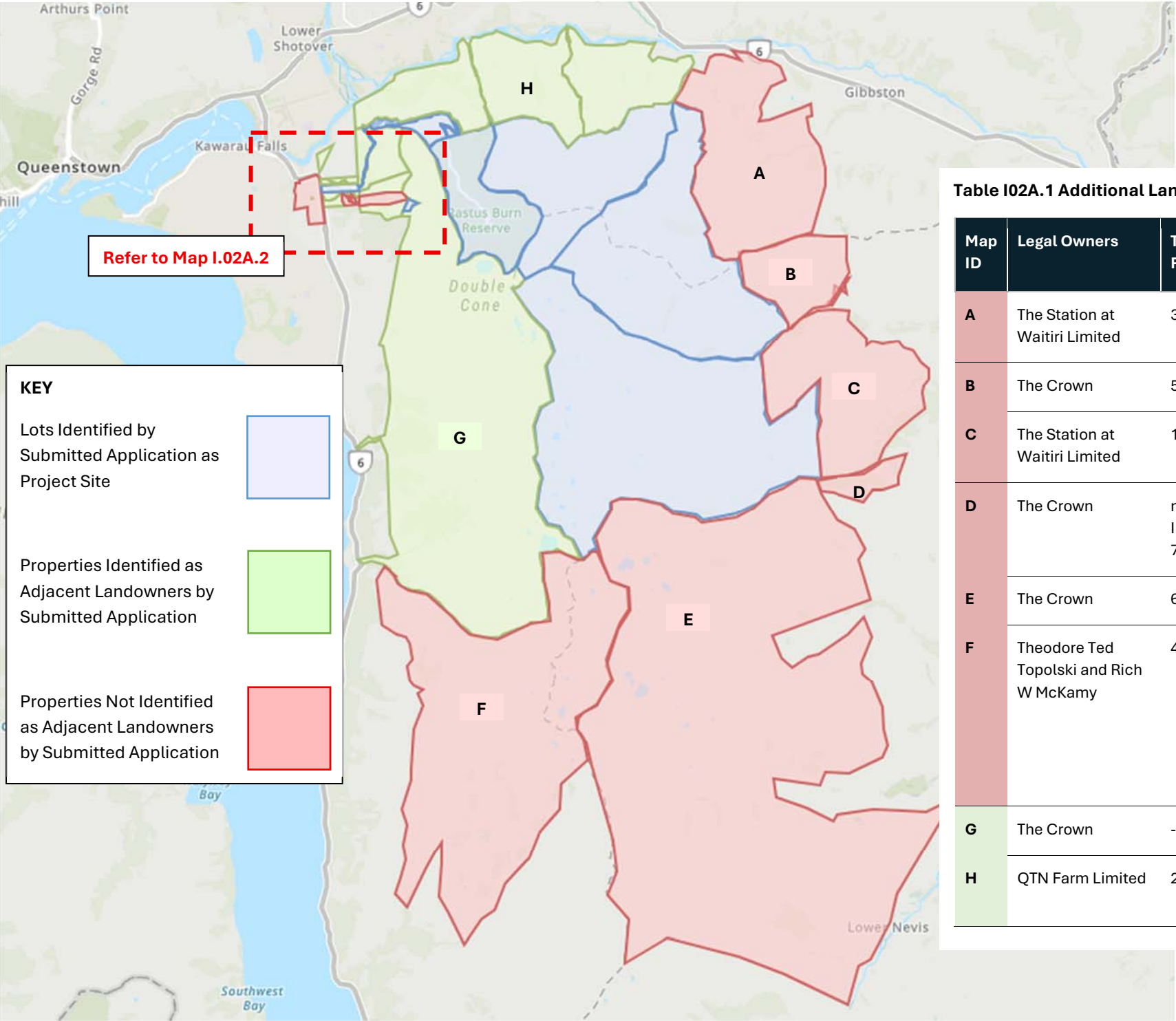


Table I02A.1 Additional Landowners

Map ID	Legal Owners	Title Reference	Legal Description	Address (if applicable)
A	The Station at Waitiri Limited	348958	Lots 1-2 DP 387160 Secs 9 18 35 41-42 49-50 Blk I Secs 2 Blk IV Kawarau SD	1786 Gibbston Highway
B	The Crown	519523	Section 9, 11, 16 Survey Office Plan 24636	-
C	The Station at Waitiri Limited	1062257	Lot 3 DP 576750 Lot 5-7 DP 402448 PT Lot 1 DP 27527 Lot 5 DP 379651 Sec 6 SO 24547	-
D	The Crown	n/a (Parcel ID 7532138)	Secs 13 15-17 19-20 22 SO 475739 - CONSERVATION	-
E	The Crown	685484	Section 14 Survey Office Plan 475739	-
F	Theodore Ted Topolski and Rich W McKamy	43848	Part Run 345B and Part Run 345A and Part Run 339B and Part Run 339E and Part Run 354A and Part Run 354B and Part Section 2-3 Survey Office Plan 23882 and Section 16 Block XIII Nevis Survey District and Part Section 1 Block I Nevis Survey District and Section 4, 15, 18-20 Block I and Part Section 3, 27-29 Block III Nevis Survey District and Part Section 30 Block III Nevis Survey District and Part Section 31, 34 Block III Nevis Survey District	-
G	The Crown	-	Section 10 Block V Coneburn	-
H	QTN Farm Limited	203506	Lot 4 DP 349682	505 Chard Road, Gibbston, Queenstown

Map I02A.2 – Lower Remarkables Transit Hub

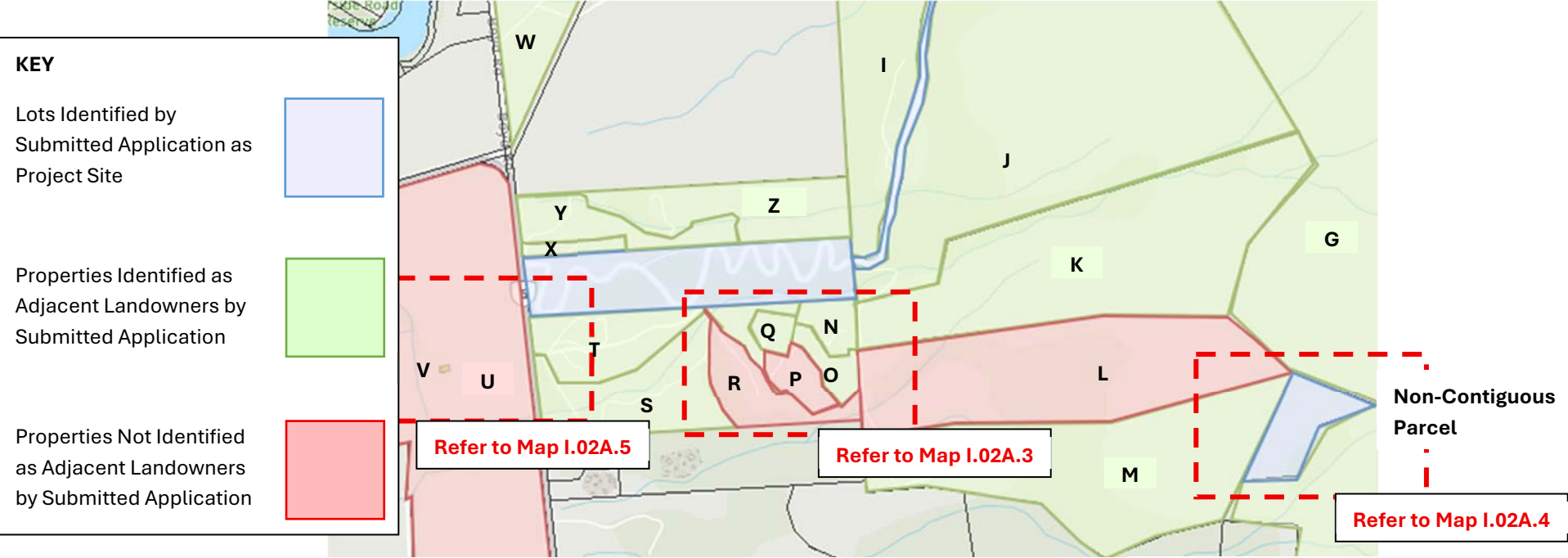
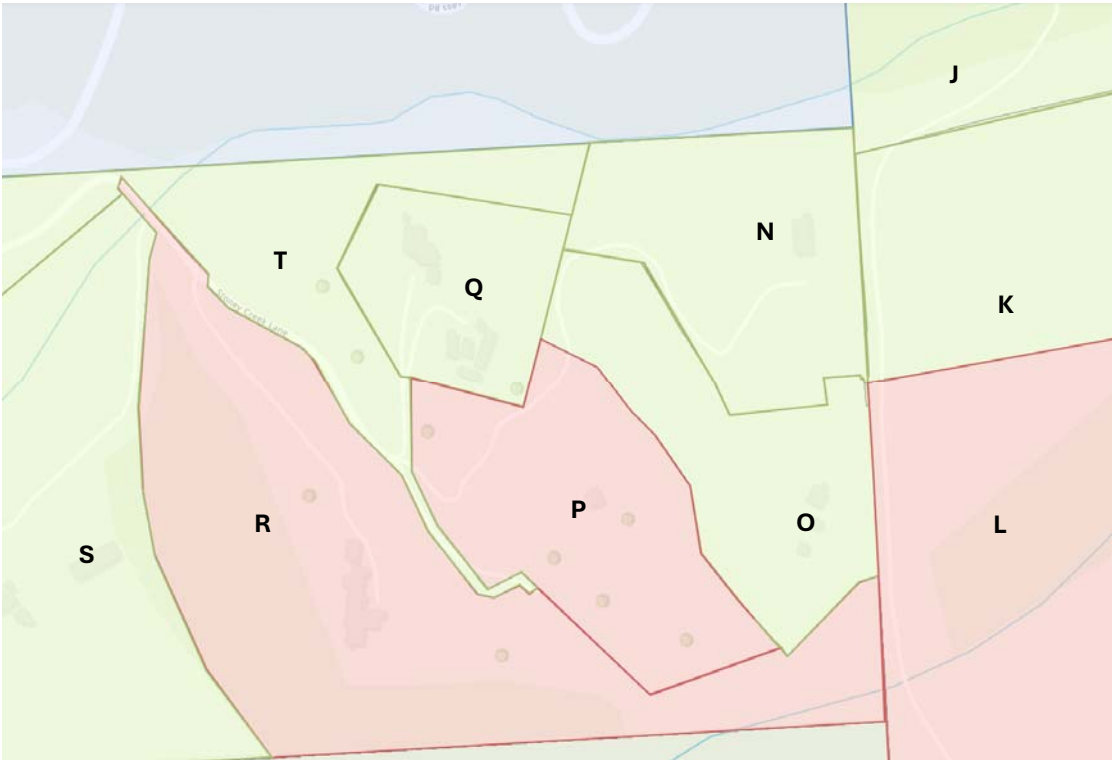


Table I02A.2 Additional Landowners

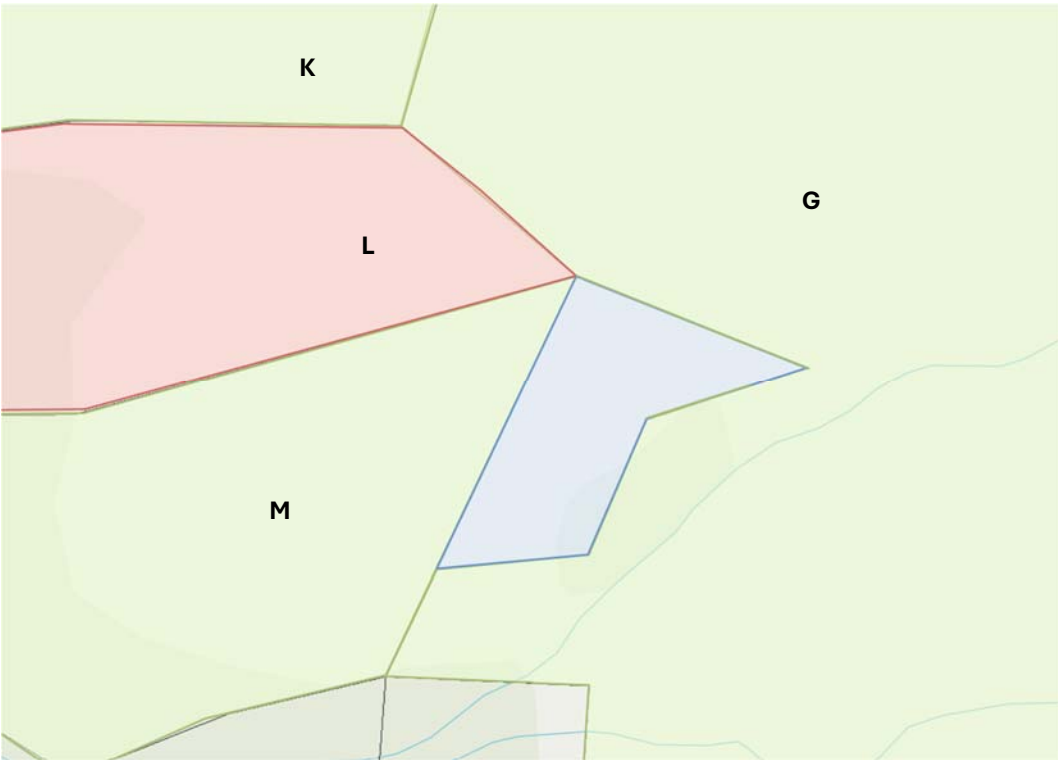
Map ID	Legal Owners	Title Reference	Legal Description	Address (if applicable)	Notes
I	Remarkables Park Stud Limited	203505	Lot 2 DP 349682	-	
J	Remarkables Park Stud Limited	203505	Lot 1 DP 349682	-	
K	David Lee, Diana Sue	7814	Lot 1 DP 301946	-	
L	Matthew John Hickey	7815	Lot 2 DP 301946	-	Does not directly adjoin Site but utilizes Remarkables Ski Field Access Road for vehicle access.
M	Mark Desmond Turner, Rebecca Jeanne Turner, Sandra May Turner	7816	Lot 3 DP 301946	216 Remarkables Ski Field Access Road, Kawarau Falls	
N	Karen Elizabeth Hanson, Garret Karl Pasquale	845448	Lot 3 DP 526483	86 Stoney Creek Lane, Kawarau Falls	
O	Russell Cairns Reddell, Joymarie Ruth White	1208421	Lot 2 DP 610302	88 Stoney Creek Lane, Kawarau	
P	Pekepeke Limited	1208420	Lot 1 DP 610302	-	Does not directly adjoin Site but utilises Site T (which is adjacent to the Site) for vehicle access.
Q	Banco Trustees Limited, Fraser James Mackenzie	OT17B/838	Lot 1 DP 25350	83 Stoney Creek Lane, Kawarau Falls	

R	Grant Hylton Hensman and Noel Thomas van Wichen	990742	Lot 2 DP 560833	68 Stoney Creek Road	Does not directly adjoin Site but utilises Site T (which is adjacent to the Site) for vehicle access.
S	Grant Hylton Hensman, Noel Thomas van Wichen	638709	Lot 1 DP 471143	4 and 6 Stoney Creek Lane, Kawarau Falls	
T	Neil Thomas McDonald	990741	Lot 1 DP 560833	7 and 10 Stoney Creek Lane, Kawarau Falls	
U	Remarkables Station National Trust	1046656	Lot 2 DP 573262	284 Kingston Road	Directly opposite across SH6.
V	Dickson Stewart Jardine, Jillian Frances Jardine, Phillip John Stevenson	1046657	Lot 1 DP 573262	-	
W	Spencer Michael Mee	OT5B/518	Section 39 Block XII Coneburn SD	38 Boyd Road, Kawarau Falls	
X	Kim Maree Boyd and William Irvine Boyd	3198	Lot 1 DP 300643	249 Kingston Road, Kawarau Falls	
Y	James Bartholomew Hennessey	926518	Lot 1 DP 545527	247 - 247A Kingston Road, Kawarau Falls	
Z	Cowan Corporate Trustee Limited, James Patrick Cowan, Maree Rita Cowan	926517	Lot 2 DP 545527	-	

Map I02A.3 – Lower Remarkables Transit Hub Zoom



Map I02A.4 – Non-Contiguous Parcel Zoom



Map I02A.5 – Opposing Properties Zoom

