QUEENSTOWN LAKES DISTRICT COUNCIL

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FTAA-2605-1236

Chair and Members of the Expert Panel
Environmental Protection Authority
Private Bag 63002
Waterloo Quay Wellington 6140
New Zealand

By email: fasttrack@epa.govt.nz

Dear Expert Panel,

Section 53 Comment from QLDC on the Remarkables Ski Area Upgrade and Doolans Expansion [FTAA-2508-1093]

1. Introduction

1.1. In response to a request to comment under s53 of the Fast-track Approvals Act 2024 (FTAA) we provide Queenstown-Lakes District Council's (Council or QLDC) written comment for the substantive application for the Remarkables Ski Area Upgrade and Doolans Expansion (the Project).

1.2. This Memorandum provides the Council's overview comments on the Application and should be read alongside, and is supported by the following technical memoranda attached as appendices:

- **Appendix 1 –** Transport Peer review – *Prepared by Mat Collins/Dave Smith – Transport Consultants*
- **Appendix 2** – Landscape Peer Review – *Prepared by Ben Espie – Consultant Landscape Architect*
- **Appendix 3** – Economic Peer Review – *Prepared by John Williamson – Consultant Economist*

- **Appendix 4** – Property and Infrastructure Technical Memo – *Prepared by Robert Galvin/Jeremy Martin/Xinghao Chen, Property & Infrastructure, QLDC*

- **Appendix 5** – Natural Hazards Peer Review – *Prepared by Mark Cruden – Engineering Consultant*

- **Appendix 6** – QLDC's Recommended Draft Conditions – with QLDC's changes to the Applicant's conditions shown in track change, including some explanatory text – *Prepared by Marcus Langman – Planning Consultant*. *Please note these are QLDC's initial comments on draft conditions and QLDC reserves it right to provide further comment on conditions under the formal opportunity afforded to it under the FTAA and as directed by the Panel.*

2. Summary

2.1. The application involves an upgrade and extension of the Remarkables Skifield into the Doolans Basin, including the development of a new gondola and associated stations, upgrade of the Rastus Burn base building, access roads to establish the infrastructure and for future trails, snowmaking facilities, wastewater treatment upgrades and development of the Lower Remarkables Transport Hub.

2.2. The development of the site includes works within the territorial authority boundaries for both QLDC and Central Otago District Council (CODC). From a consenting and land-use perspective, Council is focused on those effects generated within the Queenstown Lakes District. The activities for upgrades within the Queenstown Lakes District align with the policy intent of the Ski-Area Subzone in the Rural Zone for the Rastus Burn (in the Proposed District Plan), while the development of the Remarkables Transport Hub takes place in the Rural Zone, outside of the Outstanding Natural Landscape (ONL).

2.3. Council has reviewed the documents lodged with the substantive application and the further information provided by the applicant on 3 September 2026.

2.4. In principle, the Council supports the extension to the skifield, subject to the four key issues outlined below being addressed by the Panel. Tourism remains the most important drawcard for the Queenstown District, while at the same time the district faces increased pressure on its infrastructure and roading network. As such, much of the focus of the Council's comments are on the transport component of the Project as a result of increased visitor numbers.

2.5. The key matters for Council relate to:

a. transport and traffic effects on SH6 and subsequently the Council's transport network,
b. the effects upon landscape character and visual amenity,
c. accurate assessment of regional benefits associated with the Project, and
d. mitigation of natural hazards

1.1. For transport, QLDC considers that the Applicant's proposed monitoring-based triggers for road upgrades create uncertainty and delay mitigation. Council's position is that necessary upgrades to the SH6/skifield access road should be designed and constructed before the development becomes operational. Council also disagrees on the form of upgrades.

1.2. The Council has not peer-reviewed the ecological impacts of the Project. Council notes the extensive work undertaken by the Department of Conservation in relation to Wildlife approvals required for the Project and acknowledges the ecological assessment undertaken by the applicant. Should the Panel seek any further ecological assessment, powers under s67 FTAA are available to it.

2. Key Issues

2.1. The following are the key matters that QLDC has elected to address in this written comment:

- **Transport**
- **Landscape**
- **Economics**
- **Natural hazards**
- **QLDC condition recommendations**

3. Transport

3.1. The applicant has provided an Integrated Transport Assessment (ITA) prepared by Stantec, along with updates to the documentation. Council has engaged Mat Collins and Dave Smith (Abley Limited), to peer review the traffic assessments undertaken, attached at **Appendix 1**. QLDC has also provided comment from Council's Property and Infrastructure team, attached at Appendix 4, which focuses on transport issues.

3.2. A number of issues remain outstanding that have not been resolved between the applicant and QLDC, in particular the impact of access onto State Highway 6 (SH6). This is a particular issue for both QLDC and (we understand) NZTA. While acknowledging that NZTA is the road controlling authority for SH6, this is of particular interest to QLDC in relation to performance of the local roading network connecting to the state highway, and also because of the traffic safety for Queenstown residents using the state highway network. While the QLDC Te Tapuae Southern Corridor Structure Plan addressed potential transport intersection upgrades, the structure plan does not mean that QLDC is delivering those upgrades as has been suggested by the applicant in documentation and meetings. In addition, no detailed analysis was undertaken as part of the development of the Southern Corridor Structure Plan as to the appropriate treatment or form of intersections within the structure plan. QLDC notes that the structure plan was not developed in the context of the Project application. The interventions remain indicative, are subject to further investigation and funding, and do not remove the need to assess and appropriately mitigate the specific transport effects arising from the application

which relate directly to effects on the state highway network and performance of local roads.

3.3. QLDC considers from the Abley Report that the impact from additional vehicle traffic associated with the Project will be substantial. The function of the intersection between SH6 and the Skifield access road serves a singular purpose, which is access to the skifield. In QLDC's view, the responsibility to ensure that adequate safety and efficient transport transition between the skifield road and SH6 is achieved, is an effect for the applicant to mitigate, not QLDC.

3.4. The access road is not currently functioning satisfactorily during the ski season, causing delays associated with Skifield traffic, and falls well short of NZTA guidance in terms of design standards. This, combined with additional growth along the southern corridor, will cause significant delay, with additional costs as a result. Part of the issue is caused by a current, temporary / seasonal informal[1] requirement for a left turn exiting the skifield road (to avoid a right turn onto state highway), with vehicles travelling towards Frankton and Queenstown then needing to use the Coneburn/Park Ridge roundabout to the south before returning to the north.

3.5. QLDC does not support additional traffic generation that would exacerbate the current level of queuing and delays being experienced, unless further mitigation beyond the current traffic management measures is identified and implemented by the applicant. QLDC strongly recommends, and supported evidentially by the Abley Report, that traffic signals are assessed as a permanent control on the intersection. This will avoid the requirement for a left only exit and has the potential to address both morning and evening peak congestion.

3.6. QLDC is firmly of the view that the existing situation should not be left to continue, and that the cumulative effects of additional visitors as a result of the Skifield upgrade and expansion must be addressed.

3.7. As such, QLDC seeks conditions to address the need for an intersection upgrade. These should:

a. Cap the peak hour vehicle movements at the SH6 Remarkables access at current levels until a satisfactory SH6 Remarkables access upgrade is operational.

b. Require the applicant to upgrade the access from SH6 to the Remarkables skifield access road in a manner that is also appropriately futureproofed in the context of the SH6 Southern Growth corridor. QLDC's advice from Abley Limited is that traffic signals are likely to suit the tidal nature of ski traffic, but the form of upgrade should be confirmed through this assessment.

c. Require binding mode-share and vehicle occupancy targets (or maximum vehicle movements), monitoring of queue lengths and vehicle movements at the SH6 access, annual reporting, and defined actions if targets are not met.

d. Require a traffic management plan for the lower car parks that manages inbound queues to

[1] Road cones and a temporary small traffic sign on SH6 further south saying no U-Turn.

avoid queuing onto SH6, and to manage outbound queues to ensure that efficient operation of the transit hub is maintained.

3.8. Should the above matters not be addressed, QLDC considers that granting consent for additional parking capacity through development of increased private vehicle parking should not occur. This will have the result of forcing mode-share approaches (such as, use of park and ride, minimum car occupancy or rideshare) to maintain vehicle numbers within existing levels.

4. Landscape

4.1. To assess the effects on the Outstanding Natural Landscape in which the Project is located, Council has commissioned peer reviews of the Applicant's landscape assessments. A landscape peer review prepared by Mr Ben Espie (Vivian + Espie) is attached as Appendix 2. Mr Espie has worked with the applicant on behalf of CODC and QLDC to refine the issues in contention, which have largely been resolved.

4.2. In relation to those effects that fall within the QLDC territorial authority boundary, the peer review agrees with the assessments undertaken by Boffa Miskell on behalf of the applicant, including as to the scale of landscape effects. The peer review identifies a single point of difference from the applicant, which Council considers can be addressed by way of conditions. That issue relates to the form of retaining to be used for retaining structures.

4.3. QLDC seeks that where retaining structures are required, that gabion baskets or stone-facing of any concrete structures is required. This will ensure that effects of these structures will be visually recessive and visually blend with their context. A recommended condition is included in **Appendix 6**.

4.4. Subject to the inclusion of a condition requiring this to be undertaken, QLDC is satisfied that the effects of the Project in relation to landscape effects will protect the values of the Outstanding Natural Landscape and that other landscape effects can be adequately avoided, remedied or mitigated.

5. Economics

5.1. Council commissioned a peer review of the applicant's economic assessment prepared by Benje Patterson. The Economics Peer review by John Williamson (Ascari Partners Limited) is provided as **Appendix 3**.

5.2. Mr Williamson's conclusions are two fold:

a. that the Benje Patterson assessment is focused on the gross benefits associated with the Project, and not the net benefits; and
b. the assessment does not adequately identify genuine additional GDP from expenditure that would not have occurred without the Project.

5.3. QLDC has been consistent on its approach to consideration of regional or national benefits across fast-track applications. QLDC does not dispute that the benefits of this Project are likely to be regionally significant. However, to ensure consistency across fast-track applications, QLDC considers it is important to consider the *net* benefits arising from fast-track projects regardless of whether they meet or exceed the test of contributing to a regional or national benefit. This removes the possibility of benefits arising from a particular project being overstated.

5.4. Mr Williamson considers that the assessment does not adequately identify genuine additional GDP from expenditure that would not have occurred without the Project.

5.5. In addition, given that the Project gives rise to adverse traffic effects as proposed, consideration should be given to the cost of traffic congestion, which Mr Williamson quantifies in his assessment, based on traffic modelling undertaken by Abley Limited.

5.6. QLDC recommends that the Panel seek an update to the economic assessment to provide an accurate understanding of the net benefits associated with the Project taking into account the peer review, to assist with its decision-making and ensure a robust assessment of the Project in meeting the purpose of the FTAA.

6. Natural hazards

6.1. Council commissioned a peer review of the applicant's natural hazards assessment prepared by Derek Chinn (Stantec). The Natural Hazards peer review by Mark Cruden (Meyer Cruden Engineering Limited) is provided as **Appendix 5**. Mr Cruden has prepared advice for both CODC and QLDC. Mr Cruden's attached comments only relate to those matters that are within the QLDC territorial authority boundary. Mr Cruden has worked with the applicant's consultants to refine matters of contention.

6.2. As a result of Mr Cruden's assessment, QLDC only has two remaining issues it wishes to comment on in relation to natural hazards. These relate to flooding risk of the Gondola Base Station in Rastus Burn, and rockfall risk associated with the ridge above Swan Lake. This ridge is an important access for construction and will also form a future groomed access return trail.

6.3. In relation to the flooding risk associated with the Gondola Base Building, QLDC seeks that a condition is placed on the consent that hydrological and hydraulic modelling be completed to determine the flood flow extent, depth and velocity where it passes the proposed development area. This assessment should be used to confirm minimum floor levels for buildings and to check that the flow depths and velocities across areas to be used for egress are appropriate. This work should be completed as part of the detailed design for the development and reviewed by QLDC at engineering acceptance stage and should be undertaken by a suitably qualified stormwater engineering professional.

6.4. QLDC's comment in relation to the rockfall risk is more consequential, and QLDC does not consider that this can be solely addressed by conditions.

6.5. An expert conferencing meeting was held on 19 August, during which Mr Cruden recommended that a temporal risk assessment be undertaken for the area in question. He explained that such an assessment does not require evidence of when the last rockfall occurred but rather relies on engineering judgement regarding the likelihood of rockfall events and the probability of people being present within the affected area. He noted that this approach is recognised good practice and would assist in identifying a practical and proportionate management response. In his view, without a temporal risk assessment the hazard may need to be assessed in the same manner as a permanently occupied activity, which could result in a more conservative outcome. He therefore considered that a temporal risk assessment would assist in determining the actual level of risk and any mitigation measures required.

6.6. During the discussion, the applicant advised that no buildings were proposed within the area and that the route's primary purpose was to provide temporary construction access into Doolans Basin. The applicant explained that the access road would be used only during summer for construction activities, including transporting heavy equipment required for construction of the Doolans Basin base station. The road would not be used during adverse weather conditions or periods of thaw and could remain closed during winter if necessary.

6.7. In response, Mr Cruden indicated that he would likely recommend a condition requiring a detailed assessment at the design stage to determine whether the route was appropriate and, if so, what mitigation measures would be required. When the applicant clarified that the route was not proposed as a ski trail, Mr Cruden suggested that, if the intention was solely temporary construction access, it may be appropriate to expressly provide that the route would not become a permanent skier access route and would remain closed to skiers. The discussion concluded without agreement on whether such a restriction should be fixed at that stage. QLDC understands that the access road is indicated in the consent documentation as a return ski trail.

6.8. Mr Cruden also indicated that conditions would likely be required to give effect to this approach and suggested that the applicant's team prepare draft wording for consideration, noting that they may be best placed to draft the conditions in the first instance. He indicated that he would then review and comment on the proposed wording. This reflected a collaborative approach to developing conditions aimed at addressing the identified geotechnical risks while enabling a practical and workable outcome for the project.

6.9. However, neither QLDC nor Mr Cruden has subsequently been provided with draft conditions giving effect to the approach discussed during expert conferencing. While Mr Cruden identified a pathway by which the matter could potentially be addressed through a temporal risk assessment, detailed design review, and associated conditions, and expressly invited the applicant to prepare draft wording for his review, no such conditions have been provided to QLDC or its geotechnical expert. Consequently, the mitigation framework contemplated during expert conferencing has not been developed, reviewed, or tested, and there remains no agreed condition suite before the Panel that would implement the approach discussed by Mr Cruden.

6.10. QLDC considers that the applicant should confirm in writing to the Hearing Panel that they believe the "high" risk rating they have identified for the rock fall hazard can be adequately mitigated in the context of the temporary construction access. This should be provided to support the fast-track application.

6.11. Subject to the above, QLDC recommends that a condition be imposed for a temporal hazard assessment to be completed in relation to the Swan Lake rockfall hazard that considers both the construction access track scenario and the permanent ski run scenario. These assessments should detail and assess the effectiveness of any proposed mitigation measures. QLDC recommends that the assessments are provided at the detailed design stage and reviewed by QLDC during the engineering acceptance process. The assessment and the design of mitigation measures should be undertaken by a suitably qualified geotechnical engineering professional. The outcome of these assessments should also consider realigning any ski trails away from the hazard area if that is deemed the most appropriate mitigation measure.

7. QLDC condition requests

7.1. A full set of requested changes to the applicant's proposed draft conditions is included at **Appendix 6** of this report with rationale for the changes sought included. The key requested changes to these conditions are set out in the Council's overall comments above. Council has sought other changes, including:

a. The ability to recover costs associated with management plans and monitoring reports;
b. For matters related to Queenstown Lakes District, terminology and conditions that reflect the requirements of the Queenstown Lakes District Council Land Development and Subdivision Code of Practice (2025) and Queenstown Lakes District Guidelines for Environmental Management Plans (June 2019);
c. Removal of requirements for certification of monitoring plans;
d. Requirements for cleaning of mud or loose materials on roads;
e. Identification of an environmental representative;
f. Conditions in relation to construction noise for the Lower Remarkables Transit Hub, including notification of commencement of work to adjacent property owners;
g. Requirements for site induction;
h. Requirements for a Monthly Environmental Report;
i. Reporting Environmental Incidents.

7.2. As a general observation, the condition set does not distinguish those conditions that relate to the operation of regional council functions, versus territorial authority functions, and are not tied to the granting of specific consents. As any resource consents approved under this application will fall down to ORC, CODC and QLDC to monitor and enforce and administer any other conditioned post approval processes (i.e. engineering acceptance), it is critical that the conditions are clear as to what pertains to each authority to enable an efficient post approval process.

8. Conclusion

8.1. QLDC has reviewed the Remarkables Ski Area Upgrade and Doolans Expansion Project and the further information provided, with input from specialist transport, landscape, economics, and natural hazard experts and Property and Infrastructure staff. The key matters identified in this comment relate to traffic and natural hazards effects, with further comment on landscape and economics.

8.2. Technical assessments note that further information is required from the applicant on matters related to transport and natural hazards.

8.3. QLDC has also provided requested changes to conditions in **Appendix 6** to address the key issues identified in the technical reviews and to identify any drafting issues. These technical reviews and requested conditions are provided to assist the Expert Panel in its consideration of the application under the Fast-track Approvals Act 2024.

Fiona Blight



Manager Resource Consents
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