In the matter of	an application by NZSki Limited to upgrade the Remarkables Ski Area and the Doolans Expansion [FTAA-2605-1236]
By	**NZSki Limited**
	Applicant

Statement of Evidence of Dr Alayna Ada Pakinui Rā behalf of Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, Waihōpai Rūnanga, Te Rūnanga o Awarua, Te Rūnanga o Ōtaka Aparima, Te Ao Marama Incorporated and Aukaha (1997) Limited

27 October 2026

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Introduction

Qualifications and experience

1 He uri au nō Mere Titope Kaikanui Pakinui, nō reira ko Tahu Potiki te tīpuna, ko Puketeraki te papatipu marae, ko Kāti Huirapa ki Puketeraki te Rūnaka. Ko Dr. Alayna Ada Pakinui Rā tōhoku ikoa.

2 I hold a Doctorate of Philosophy in Landscape Architecture and Kāi Tahu voice in Landscape Policy from Queensland University of Technology. I also hold a Bachelor of Landscape Architecture (Hons) from Lincoln University, Diploma in Māori He Tohu Pōkairia from Ara Institute of Canterbury, Diploma in Te Rōnakitanga ki te Reo Kairangi (Rumaki Level 5) from the Southern Institute of Technology, and a Certificate in Iwi Environmental Management from Te Wānanga o Aotearoa.

3 My current position is Technical Director, Infrastructure Advisory, WSP. I am a Registered Landscape Architect with Tuia Pito New Zealand Institute of Landscape Architects (NZILA) and the Australian Institute of Landscape Architects (AILA). I am the Chair of Te Papa Tū Whirinaki Landscape Foundation of Aotearoa and Chair of Te Tī Māori Advisory to the Infrastructure Commission. I am a core member of Te Tau-a-Nuku Māori Landscape Architects rōpū and Pae Matua with Ngā Aho Māori Design Institute. I am a recent outgoing board member of both Infrastructure New Zealand (INZ) and NZILA.

4 I have 20 years of experience as a landscape architect and landscape planner from across Aotearoa, Canada and Australia. I was a lead author of the Australian Institute of Landscape Architects (AILA) 'Guidance Note for Landscape and Visual Assessment (GNLVA)' and a contributor to the New Zealand Institute of Landscape Architects (NZILA) 'Te Tangi a Te Manu Aotearoa Landscape Assessment Guidelines'. My impact assessment experience spans an array of built environment and infrastructure sectors, including large scale open cut mining in Australia, pit-to-port infrastructure, broader linear rail/road infrastructure, transmission lines and substations, water treatment plants, subdivision and high-rise development, among other infrastructure typologies. I have prepared landscape character assessments which consider the amenity and character of suburbs, towns and whole districts.

5 For a decade I was a key contributor to the AILA Queensland Landscape Planning Committee and was awarded two institute awards for my service to the advancement of the landscape planning profession, being the AILA QLD Presidents Award and the AILA National Presidents Award.

6 My work has included preparing and giving expert evidence.

Purpose and scope of evidence

Whakarongo ake au ki te tangi a te manu nei, a te mā-tui; Tui, tui, tui, tuia.

Tuia i runga, tuia i raro;
Tuia i roto, tuia i waho.
Tuia te here tangata;
Ka rongo te ao, ka rongo te pō.
Tuia te muka tangata i takea mai i Hawaiki-nui,
i Hawaiki-roa, i Hawaiki pāmāmao.
Te hono i wairua;
Ki te whai ao, ki te ao marama.
Tihei Mauri Ora!

I listen to the cry of the mā-tui; binding and uniting.

Binding that which is from above, with that below;
Binding that which is from within, with that outwards;
Binding together the threads of people;
Through the peace of day, through the peace of night.

Binding the threads of humankind, from the great homeland, from the far homeland, from the remote homeland Connecting with the spirit;
From the world of light, and the world of consciousness.

Behold the sneeze of life!

7 The primary purpose of this evidence is to provide an assessment of the Application's landscape and natural character effects in accordance with *Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines* (NZILA, 2022), and to assess and reflect the relationship between Kā Rūnaka rights and interests and the lands, waters and skies affected by the Application.

8 This primary purpose extends to upholding the ihi and vital force held in the whakapapa of Kā Rūnaka and the mana of the places that they care for. It therefore encompasses the interconnected worlds of ira tangata, the realm of human occupation and lived experience, and ira atua, the realm of the atua and of original forces, elemental authority, and generative presence which is immanent within the landscape itself. The tihi o Kawarau, the highest summits within the Kawarau mountain system, are points of convergence between the two realms. These summits serve not only as points of origin for water, but also sites of heightened presence, where visibility extends across the entire catchment from Whakatipu Waimāori to

Kawarau awa and Papapuni, and where the physical form of the land allows an unbroken visual and metaphoric connection to the atua. In this way, Kawarau represents both the pinnacle of the landscape and the point from which all continuity flows: a place of encounter, of generation, and of authority, from which the interconnected system of te riu hopuwai o Kawarau is both formed and understood.

9 I have visited a range of publicly accessible locations noted in documents (d) through (i), and have considered the following documents as matters relevant to this kaupapa:

(a) Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines (TTatM) (NZILA, 2022);

(b) Āpiti Hono Tātai Hono: Ngā Whenua o Ngāi Tahu ki Murihiku (2021);

(c) B-02A Remarkables Ski Area Upgrades and Doolans Expansion - Treaty Settlements Redacted;

(d) B-03A Remarkables Ski Area Upgrade and Doolans Expansion Landscape Effects Assessment Redacted (LEA, collectively with documents (e) – (i), the Assessments);

(e) B-03.1 Remarkables Ski Area Upgrade and Doolans Expansion Landscape Graphics;

(f) B-03.2 Remarkables Ski Area Upgrade and Doolans Expansion Landscape Graphic Simulations;

(g) B-03.3 Remarkables Ski Area Upgrade and Doolans Expansion Landscape Simulations High Res;

(h) B-04A Remarkables Ski Area Upgrade & Doolan Expansion - Carpark and Bus Hub Landscape Effects Assessment Redacted;

(i) B-04.1 Remarkables Ski Area Upgrade & Doolan Expansion - Carpark & Bus Hub Landscape Graphics;

(j) B-09 Remarkables Ski Area Upgrade and Doolans Expansion - Freshwater Ecological Impact Assessment;

(k) B-10 Remarkables Ski Area Upgrades and Doolans Expansion - Rastus Burn Wastewater Freshwater Ecological Impact Assessment;

(l) Schedule 21.22.14 Northern Remarkables ONL of the Queenstown Lakes Proposed District Plan; and

(m) Schedule 21.22.9 Kawarau River ONF of the Queenstown Lakes Proposed District Plan.

10 I have attended a meeting and a site visit (23 January 2026) with NZSki representatives and the landscape assessment authors.

Expert Witness Code of Conduct

11 Although these proceedings are not before the Environment Court, I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving oral evidence before the Expert Panel. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Summary

12 The key points of my evidence are:

(a) The Applicant's approach contains methodological fatal flaws relative to Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines, NZILA (2022), these being:

(i) Cultural landscape values have not been evaluated to inform the determination of effects; and

(ii) The Assessments do not apply a bicultural evaluative framework consistent with TTatM and instead separates cultural values from the effects assessment process.

(b) The interconnected ecological, cultural and landscape relationships recognised through ki uta ki tai and the Application's location within the Kawarau catchment have not been appropriately considered.

(c) The LEA contains the following deficiencies and inconsistencies:

(i) The inadequate identification and application of the landscape's capacity to absorb change;

(ii) The failure to assess cumulative effects at appropriate landscape and catchment scales, including cumulative effects on cultural landscape values;

(iii) The failure to adequately consider natural character effects beyond the immediate catchments affected by the Application; and

(iv) The absence of consideration of how climate change intersects with the proposed landscape and natural character effects.

Peer review of Applicant's Assessment

Cultural landscape values are not evaluated to inform the determination of effects

13 The LEA acknowledges the significance of this area to mana whenua. It describes cultural landscape values as "both historical and contemporary, tangible and intangible" (LEA, p14) and recognises values including whakapapa connections to the land and water, kaitiaki responsibilities to protect their mauri, links to the atua, mahika kai, ara tawhito, nohoaka, wāhi tapu, and wāhi tīpuna.

14 However, these mana whenua values are treated as contextual information rather than matters which materially inform the assessment of landscape effects. The report states that "Assessment of effects on cultural landscape values is acknowledged as the domain of mana whenua. Therefore, this report does not attempt to assess the effects on cultural values" (LEA, p19). Cultural landscape values are subsequently not considered in effects judgments.

15 It is established practice that landscape architects rely on expert inputs outside their own area of expertise, such as ecology, archaeology, and heritage. TTatM establishes that "integrating different types of information is central to landscape architecture expertise", including "tāngata whenua perspectives" and "cultural narratives" (TTatM, 4.37). Assessors applying TTatM have an obligation to defer to mana whenua and pūkenga/pūkeka on cultural considerations, accept and acknowledge concerns raised, and synthesise that information into their landscape effects assessment. This requirement was described by expert witness, Ms Bridget Gilbert, during the landscape hearing for the Bendigo-Ophir Gold Project Fast Track Application on 9 June 2026 (Transcript at 11:14–21).

16 The Assessments acknowledge that "landscape draws on diverse sources" including "cultural perspectives" and "is perceived and experienced as a unified phenomenon. It is an integrated whole" (LEA, p10). Despite this, the Assessments fail to consider cultural perspectives in their effects judgments and are thereby unable to assess landscape as an integrated whole.

17 The LEA identifies that physical landscape values associated with this landscape relate to “Tāngata whenua” (LEA, p11) but otherwise does not describe any cultural values related to physical or perceptual values in Sections 4.2.1.1 to 4.2.1.2 (LEA, p11-13). Cultural landscape values are therefore relegated only to associative values (LEA, p13-14). This is inconsistent with TTatM, which conceptualises ‘inextricably linked’ elements in a Venn diagram illustration (TTatM, p72), whereby the physical, perceptual and associative dimensions link to whakapapa, kōrero tuku iho and hīkoi. This omission restricts Kā Rūnaka values to an Anglo-planning lens of effects assessment that does not give due agency to the way in which tangata whenua experience the cultural landscape.

18 The Assessments fail to mention or consider Āpiti Hono Tātai Hono, which was released by Ngāi Tahu ki Murihiku in 2021. Āpiti Hono Tātai Hono is the authoritative methodology for cultural landscape assessment across Murihiku and parts of Otago:

(a) Āpiti Hono Tātai Hono requires recognition of Ira Atua and Ira Tangata, whakapapa-based assessment, and a holistic view of landscape relationships. The methodology is premised on a holistic perspective of Ira Atua Ira Tangata which “makes no distinction between ‘cultural’ or ‘natural’ or any other dissociative classifications” (Kitson & Cain, 2023, p20). It anchors mana whenua associations with and relationships to place.

(b) Āpiti Hono Tātai Hono enables a comprehensive understanding of landscape as known to Ngāi Tahu ki Murihiku, which represents the collective of four of the seven Papatipu Rūnanga which make up Kā Rūnaka: Te Rūnaka o Waihōpai, Te Rūnanga o Awarua, Te Rūnanga o Ōraka Aparima, and Hokonui Rūnanga.

(c) The absence of Āpiti Hono Tātai Hono from the LEA underscores its failure to integrate cultural landscape values and mana whenua perspectives as required by TTatM. In my opinion, this omission has resulted in an under-assessment of the proposal's landscape and natural character effects, particularly in relation to ancestral and cultural landscapes, and creates uncertainty as to whether all relevant adverse effects have been adequately identified and evaluated.

19 The Assessments are fundamentally incomplete. They do not consider cultural landscape values in the assessment of effects. They do not document or evaluate what effects may mean for takata whenua, and therefore do not successfully apply TTatM landscape evaluation methods to inform effects findings, despite stating that the methodology is consistent

with TTatM. This presents a methodological fatal flaw, due to the failure to give proper consideration to the bicultural framing of TTatM, in particular Section 2 – Mātanga Hoahoa Whenua and Section 2 – Te Ao Māori, and thus renders the Assessments incomplete.

Natural character assessment

20 The LEA's assessment of natural character is also inconsistent with TTatM as well as internally inconsistent in how it presents effects ratings. The LEA considers natural character in reference to section 6(a) of the RMA. In the absence of an RMA definition of natural character, and in the context of a landscape assessment that claims to be consistent with the methodology of TTatM, I would expect the LEA to align with the TTatM definition of natural character. In Section 4.5 of the LEA, the natural character of freshwater bodies in the Rastus Burn and Doolans Creek Right Branch catchments is consistently defined by the degree of and proximity to human modification, with "the highest degree of natural character occur[ing] where there is the least apparent modification. Conversely, rivers, wetland and their margins that have been highly modified will have a lower (but retain some) level of natural character" (LEA, p23). In contrast, TTatM clearly and explicitly identifies that "the range of natural character between pristine and modified (i.e. naturalness) is only one matter" of the characteristics and qualities that contribute to natural character (TTatM, 9.05). The LEA is therefore methodologically inconsistent with TTatM in how it defines natural character.

21 The LEA is inconsistent in assessing existing natural character and natural character effects across a) catchment scale versus specific freshwater bodies; b) during construction versus operation; c) overall effects versus effects specifically on freshwater communities and habitats; and d) natural character as a whole versus "perceptual" and "direct" effects.

(a) For example, existing natural character within the Rastus Burn catchment is described individually as very high for Lake Alta and its margins, high for Swan Lake tarn, and moderate to high for "tributaries of the Rastus Burn (streams draining the tarn and Lake Alta) and the Rastus Burn below the confluence" (LEA, p23-24).

(b) Meanwhile, natural character effects are assessed as "low temporary effects" and "very low natural character effects on the Rastus Burn once access roads to towers are rehabilitated" (LEA, p34); low "perceptual" natural character effects on the freshwater environment of Swan Lake tarn and its margins (LEA, p35); and "overall, the natural character effects on freshwater vegetation communities are

assessed as low within the Rastus Burn catchment" while "perceptual aspects of natural character will not be substantially impacted" (LEA, p35).

(c) The LEA therefore lacks internal consistency in its natural character effects ratings, rendering it incomplete and unreliable.

22 Given that water feeds the whenua and underpins the functioning and integrity of local ecosystems, hydrological changes triggered by the Application components could impact flora and fauna, not only in water bodies and their margins themselves, but also in the broader catchment ecosystems. The LEA has failed to consider this in its natural character judgments.

23 Furthermore, the LEA fails to consider natural character effects beyond the immediate catchment areas where the Application components are located. The Rastus Burn and Doolans Basin catchments and their associated tributaries are neither ecologically nor culturally isolated hydrological units. TTatM requires assessors to explain the broader context of the relevant area identified for natural character assessment (TTatM, 9.17), which the LEA fails to do:

(a) As identified in the Applicant's own Freshwater Ecological Impact Assessment and Rastus Burn Wastewater Freshwater Ecological Impact Assessment, the Doolans Creek is itself a tributary to Papapuni (Nevis) awa, with water from both catchments draining to the Kawarau awa and subsequently the Clutha Mata-Au awa.

(b) The Kawarau River is identified as an Outstanding Natural Feature (ONF) in the Queenstown Lakes Proposed District Plan Schedule 21.22.9, which documents its hydrological and ecological importance, identifies it as a wāhi tīpuna, and describes associated mana whenua values including ara tawhito, mahika kai, nohoaka, kāika, and tauraka waka.

(c) The Application falls within te riu hopuwai o Kawarau, the Kawarau catchment as it was culturally conceptualised and experientially defined by mana whenua. Te riu hopuwai o Kawarau must be understood as a nested system within the wider ki uta ki tai framework, where the processes initiated at the highest alpine environments, both physical and cultural, are transmitted through interconnected systems, shaping cultural and environmental effects downstream.

Broader catchment, climate change and cumulative effects

24 The Application's failure to recognise the interconnectedness of the Rastus Burn and Doolans Creek catchments with the wider landscape and downstream communities results in effects determinations which do not give due consideration to the ecological and cultural aspects of natural character.

25 The LEA identifies "Climate and Soils" as physical landscape values associated with this landscape (LEA, p11). However, there is no discussion of how the Application components interact with and affect the landscape in the context of a changing climate. As per Dr Dixon's evidence, the Application does not demonstrate an integrated assessment of climate change, including natural character effects, which is considered an omission given the dependence of the Application on freshwater take, conveyance, and storage for snow making purposes in the Doolans Basin.

26 Among other aspects, the LEA has assessed the natural character effects from disturbance to freshwater communities, the modification of the existing tarn to create a storage lake, and flow reduction associated with water take. None of these effects ratings have considered the pressure applied by the Application to a sensitive alpine environment stressed by climatic changes, nor the impacts on cultural values associated with the natural character of the hydrological system and freshwater communities over time.

27 As noted in point 12 above, and discussed throughout the evidence of Mr Dale, the LEA fails to consider cascading impacts on the broader Kawarau catchment and downstream hydrological and ecological effects of the Application. Furthermore, interdependent social and cultural effects within the District that are of interest to Kā Rūnaka, and as described by Dr Tipa and Mr Ellison, remain unaddressed in the LEA. It also fails to consider how these converge with projected climate change.

28 Therefore, I consider determinations of natural character effects relative to freshwater bodies and the ecosystems they support as incomplete and unreliable given the lack of consideration of long-term effects and the fundamental viability of climate-related components of the Application.

29 The LEA's cumulative effects assessment provides insufficient reasoning for its effects judgments in relation to the capacity of the landscape to absorb change. The LEA assesses cumulative landscape effects on the Rastus Burn catchment as low "due to the capacity of the area to absorb this additional change that is expected as part of the existing ski field development and zoning of the area" (LEA, p49). Despite the reliance on landscape capacity for effects determinations, there is an absence of

discussion on the overall landscape sensitivity to change beyond specific reference to the limited landscape capacity for the establishment of gondolas (LEA, pp iii, 52), despite further information available in Schedule 21.22.14 Northern Remarkables ONL of the QLPDP. In addition, zoning itself does not diminish the potential for landscape effects nor does it define the capacity of the landscape to absorb change. Consideration of broader landscape sensitivity in relation to the established landscape values has the potential to result in an elevated assessment of cumulative effects for the catchment.

30 The LEA further assesses cumulative effects on the wider ecological district as low to moderate given that the affected area "equate[s] to 0.05% of the subalpine and alpine environments of the Ecological District above 1100 metres" (LEA, p50). The LEA does not explain why cumulative landscape effects have been assessed relative to the Ecological District rather than other relevant landscape scales. Cumulative effects should be assessed at the scale of te riu hopuwai o Kawarau, the Kawarau catchment as it was conceptualised and experienced by mana whenua, to have relevance to a culturally cohesive landscape unit.

31 The LEA explicitly assesses cumulative *visual* effects for the Doolans Basin and cumulative *landscape* effects for the Rastus Burn catchment and Ecological District. It does not include an assessment of cumulative natural character effects for any landscape units. The LEA is therefore incomplete for failing to assess the set of cumulative visual, landscape, and natural character effects at relevant spatial scales.

32 The LEA does not properly account for associated cultural effects triggered by successive changes to landscape and natural character, including that of the Application. This undermines the cultural values that contribute to the way natural character is experienced and valued at place, including ancestral and spiritual connections to Kawarau, in a landscape recognised as inherently interconnected. These cultural connections and relationships will exist in perpetuity and forever hold inherent significance for Kāi Tahu despite the ongoing disruption to those areas and their 'naturalness', as perpetuated by the Application. Cultural landscape connectedness does not diminish with cumulative effects, but is instead met with ever growing intergenerational effects on cultural identity, practice, and continuity of relationship with whenua and atua.

Conclusion

33 In my professional opinion, the Assessments contain a series of methodological flaws which have resulted in an inaccurate determination of

landscape and natural character effects for Kā Rūnaka. In particular, while the Assessments reference the adoption of industry best practice guidance, it does not fulfil its obligation under Te Tangi a te Manu to apply an informed, bicultural evaluative framework. It acknowledges cultural landscape values and then excuses itself from carrying those values through into the determination of effects.

34 The Assessments ignore the inherent ecological and cultural interconnectedness with the broader landscape and catchment, as recognised through ki uta ki tai and the Application's location within te riu hopuwai o Kawarau.

35 Moreover, the Assessments present other methodological inconsistencies and flaws which compromise their reliability for an accurate assessment of landscape and natural character effects. These include the:

(a) inadequate identification and application of landscape capacity to absorb change;

(b) lack of cumulative effects assessment at appropriate spatial scales;

(c) lack of consistency in the assessment of types of effects and across relevant landscape units;

(d) lack of consideration of cumulative effects on cultural landscape values;

(e) failure to consider natural character effects beyond the immediate catchment areas where the Application components are located, despite their inherent ecological and cultural connectedness with the broader landscape; and

(f) absence of consideration of how future climate change intersects with changes proposed by the Application to affect landscape and natural character, both within the immediate site as well as the broader landscape and catchment.

36 Taken together, these flaws materially undermine the reliability of the Assessment's conclusions. The approach ignores structurally underpinning aspects of TTatM, resulting in effects findings which are not a robust product of the TTatM method but rather of a constrained, conventional effects lens that fails to integrate mana whenua perspectives.

37 Accordingly, I consider that the current Assessments contain significant methodological deficiencies and do not provide a reliable basis for assessing the landscape and natural character effects of the Application. In

my opinion, there is potential for significant adverse effects that have not been adequately identified, assessed or mitigated. The Application should not proceed on the basis of the current assessments and should instead be supported by a reassessment that fully complies with TTatM, integrates cultural landscape values into the effects evaluation, and resolves the methodological flaws and inconsistencies identified in this evidence.

Dr Alayna Ada Pakinui Rā
27 October 2026