MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE REMARKABLES SKI AREA UPGRADE AND DOOLANS SKI FIELD EXPANSION

27 October 2026

1. Introduction

1.1. This memorandum presents the assessment undertaken by the New Zealand Transport Agency Waka Kotahi (NZTA) of the substantive application for the Remarkables ski area upgrade and Doolans Ski Field Expansion (the Application/the proposed development) (NZTA reference 2026-0156), submitted by NZSki Limited (NZSki/the Applicant) under the Fast Track Approvals Act 2024 (FTAA).

1.2. NZTA appreciates the opportunity to comment on the Application.

1.3. The assessment has been prepared in response to an invitation from the Expert Panel (the Panel) to provide comment and includes a summary of preliminary findings relating to transportation considerations as they relate to the state highway network.

1.4. This assessment is based on the Application materials submitted to the Environmental Protection Agency (EPA).

1.5. NZTA has drawn on input from qualified and experienced internal staff when putting together its comments. Specifically, input was sought from:

(a) Roy Johnston: Principal Safety Engineer based out of the NZTA Dunedin Regional Office. Roy has been employed by NZTA for 19 years and holds a Diploma in Engineering (Level 6) (Civil) from Otago Polytechnic.

(b) Hilary Fowler: Senior Transport Planner based out of the NZTA Christchurch Office. Hilary has been employed by NZTA for four months, starting in July 2026. She holds the qualifications of Post-Graduate Certificate in Transport Engineering from University of Canterbury, Bachelor of Science (Geography) and Bachelor of Arts (Applied Statistics) from University of Otago.

(c) Stuart Pearson: Principal Planner based out of the NZTA Christchurch Office. Stuart has been employed by NZTA in their Environmental Planning team, since 2016. Stuart holds the qualifications of Bachelor of Environmental Management and Planning (Minor in Professional Planning) and Master of Applied Science (Environmental Planning) (First Class – Second Division) from Lincoln University.

(d) Lauren Barnett: Senior Legal Counsel in the Environment and Property section of the NZTA National Legal Team. Lauren has been in the Environment and Property industry since 2006, as both a planner and lawyer, and has been employed by NZTA for 3 years. Lauren holds a Bachelor of Law qualification from University of Otago and is an Associate member of the New Zealand Planning Institute.

2. Background

2.1. The proposed development seeks to enhance and future proof the existing Remarkables Ski Area, located approximately 24 km from central Queenstown within the Rastus Burn Recreation Reserve, and includes expansion into the adjacent Doolans Basin within the Remarkables Conservation Area. Access to the site is via the private Remarkables Ski Field Access Road, which connects to Kingston Road (State Highway 6; (SH6)). This section of the state highway network is also referred to as the SH6 Southern Corridor (the Southern Corridor).

2.2. NZTA provided preliminary feedback to NZSki on the substantive application on 23 July 2026. NZTA advised that further mitigation was required to manage the proposed development's transport effects, noting that the Integrated Transport Assessment (ITA) identified existing capacity constraints at the Remarkables Ski Field Access Road/SH6 private access. It was recommended that the access be upgraded prior to development, with further improvements completed prior to the Stage 2 development and secured through consent conditions at NZSki's cost. NZTA did not support reliance on recurring temporary traffic management or a variable speed limit and sought further justification and sensitivity testing of the mode shift assumptions, including assessment of the effects on the state highway network if the anticipated reduction in private vehicle use is not achieved.

2.3. A meeting was held between NZTA, Queenstown Lakes District Council (QLDC) and NZSki on 27 August 2026 to discuss the proposed development and NZTA's preliminary feedback. The discussion also addressed the Queenstown Strategic Network Plan for the Southern Corridor, subsequently published on 6 October 2026. The plan identifies the Southern Corridor as a key component of Queenstown's future integrated transport network, with a focus on capacity and resilience, reliable high capacity public transport, park and ride facilities and improved active travel connections. The preferred approach includes a new Kawarau crossing, with its ultimate form subject to further investigation. NZTA advised that no business case had been completed for the preferred Southern Corridor infrastructure upgrades and no funding had been secured. Consequently, future public investment can not be relied upon to mitigate the proposed development's effects. NZTA maintains that improvements to the Remarkables Ski Field Access Road/SH6 access should be operational before the ski field expansion, alongside measures to encourage public transport and greater vehicle occupancy to reduce private vehicle demand on the Southern Corridor.

2.4. NZTA does not oppose the proposed expansion of the Remarkables Ski Area in principle and acknowledges that the proposed land use is appropriate in this location. However, NZTA has concerns about the additional transport demand generated by the proposed development and its effects on SH6, particularly at the Remarkables Ski Field Access Road access and across the wider Queenstown transport network.

3. Assessment of proposal on NZTA's network and assets

3.1. NZTA's interest in the Application is confined to the robustness of the technical reports submitted and ensuring that transport effects, particularly as they relate to the state highway network, are appropriately managed.

3.2. NZTA wishes to comment on the following matters:

a. The proposed development's effects on state highway capacity;
b. Mode shift and travel demand;
c. Reliance on temporary traffic management;
d. Improvements to the Remarkables Ski Field Access Road/SH6 access; and
e. Proposed transport conditions.

4. The proposed development's effects on state highway capacity

4.1. NZTA notes that the ITA identifies existing capacity constraints at the Remarkables Ski Field Access Road/SH6 access, which was assessed as operating above its theoretical capacity on high demand weekdays in 2025. As background traffic on SH6 increases, the ITA predicts that ski area departure demand will exceed the existing capacity of the access on all days of the week during the operating season by 2028, even with the current temporary traffic management arrangement encouraging left turn exit movements only onto SH6. Under the 2028 baseline scenario, the ITA predicts PM peak delays exceeding 600 seconds and queues of approximately 800 m on the ski field access road. While the ITA attributes the short term deterioration primarily to background growth on SH6, it also recognises that the increased visitor numbers associated with the proposed development will generate additional vehicle movements at an already capacity constrained access with SH6.

4.2. In addition to the efficiency effects identified above, NZTA considers that the potential safety implications of increasing demand at an already capacity constrained access require further consideration. The forecast increase in delays and queuing indicates that vehicles accessing and departing the ski field will be operating under increasingly constrained conditions, with greater interaction between turning movements and through traffic on SH6. These conditions have the potential to influence driver behaviour, including gap selection for vehicles entering SH6, and therefore warrant consideration from a safety perspective in addition to the capacity and efficiency effects identified in the ITA. This is particularly relevant given that the proposed development will introduce additional demand at an access that is already forecast to operate beyond its available capacity.

4.3. It is noted that, even with the assumed shift towards buses, higher vehicle occupancies and use of the proposed SH6 park and ride facility, the ITA forecasts the number of visitors travelling by private vehicle increasing from 2,450 in the 2025 reference scenario to 2,600 under Stage 1 and 2,850 under Stage 2. Total visitor numbers are forecast to increase to 4,500 and 6,000 respectively. Stage 2 also anticipates 1,400 people using the SH6 park and ride facility, predominantly arriving by private vehicle, with approximately 500 to 600 parking spaces potentially required. While this facility may reduce vehicle demand on the ski field access road, it does not provide a corresponding reduction in private vehicle demand on SH6 for visitors who drive to the facility.

4.4. It is considered that the assumed mode shift has not been sufficiently demonstrated. Given the limited certainty about the measures required to achieve it, actual private vehicle demand may be higher than assessed. This is particularly relevant to the wider Southern Corridor, where the ITA identifies substantial forecast growth in SH6 demand and recognises the need to reduce private vehicle trips to address future capacity constraints.

4.5. NZTA acknowledges that wider network growth contributes to the need for improvements at the private access. However, this does not remove the need for NZSki to mitigate the additional demand generated by the proposed development. Further assessment should distinguish between background growth and development related demand when determining the appropriate form, timing and funding of the access improvements, rather than assuming that wider Southern Corridor improvements will provide the necessary mitigation.

5. Mode shift and travel demand

5.1. NZTA considers that further justification is required for the mode share / mode shift assumptions in the ITA. Table 7-5 identifies a target split of approximately 50% shuttle/bus and 50% private vehicle but does not sufficiently distinguish between visitors travelling by bus from Queenstown, Frankton or

another offsite origin and those driving along SH6 to the proposed park and ride facility before transferring to a shuttle. The latter does not reduce private vehicle demand on SH6. Table 4-4 identifies an existing offsite bus mode share of approximately 24% to 31%. Clarification is sought on the extent to which the proposed measures would reduce private vehicle trips on SH6, rather than transfer visitors to shuttles near the ski field access.

5.2. NZTA considers that more substantive travel demand management measures are required to demonstrate that the forecast mode shift can be achieved and sustained. Under the current arrangements, ski field parking is free while a return bus trip from Queenstown or Frankton costs approximately $49, providing limited financial incentive to travel by bus. Measures such as substantially reduced bus fares, parking charges and sufficiently frequent and convenient bus services would provide a stronger basis for the assumed mode share. NZTA also seeks sensitivity testing of a credible higher private vehicle demand scenario, particularly for Stage 2. Even with the assumed mode shift, Stage 2 is forecast to generate approximately 190 additional vehicles in the AM peak and 220 in the PM peak. If that mode shift is not achieved, the increase in private vehicle demand on SH6 could be materially greater.

5.3. The sensitivity testing sought by NZTA should also consider the safety implications of higher private vehicle demand at the Remarkables Ski Field Access Road access. If the forecast mode shift is not achieved, the resulting increase in turning movements would occur at an access already identified as capacity constrained. The assessment should therefore consider not only changes in delay and queue length under a higher private vehicle demand scenario, but whether those operating conditions alter the safety performance of the access or require additional safety mitigation.

5.4. NZTA considers that consent conditions should secure the travel demand management measures relied upon in the ITA, measurable mode share targets and monitoring following commencement of operation. Where monitoring identifies that the required outcomes are not being achieved, additional or amended measures should be implemented to reduce private vehicle demand. NZTA seeks amendments to proposed condition TRANS.10 to this end, as outlined in Section 8 below.

6. Reliance on temporary traffic management

6.1. NZTA does not support recurring temporary traffic management (TTM) as the means of providing the operational capacity required for a permanent development. The existing arrangement requires vehicles leaving the Remarkables Ski Field Access Road to turn left onto SH6, travel south to the downstream roundabout and turn around to travel north towards Queenstown. While this may assist during periods of high demand, it generates additional movements on SH6 and does not substitute for a permanent solution at the access that is capable of safely and efficiently accommodating demand related to the development. The ski season extends over several months and recurs annually; NZTA therefore does not consider this arrangement a genuinely temporary response to an intermittent transport issue.

6.2. It is understood that the downstream roundabout is intended to be replaced with traffic signals in association with future private development. Its continued availability for ski field traffic to reverse direction cannot therefore be assumed as a reliable long term component of the proposed development's transport solution. This reinforces the need for a permanent solution at the Remarkables Ski Field Access Road private access with SH6, rather than reliance on recurring TTM and other parts of the SH6 network.

6.3. NZTA is also concerned that recurring reliance on TTM does not provide an appropriate long-term means of addressing potential safety effects associated with increased development-generated

demand. TTM may be appropriate for managing temporary or discrete safety risks, but it should not substitute for permanent infrastructure capable of safely and efficiently accommodating the recurring traffic demand generated by the development. Where an identified operational constraint recurs throughout the ski season and on an annual basis, NZTA considers that the appropriate response is a permanent access solution designed to accommodate that demand.

6.4. NZTA considers that TTM should manage temporary safety risks arising from particular events, activities or circumstances, rather than provide ongoing capacity related to the development. The Application also identifies potential use of temporary traffic signals during the ski season. NZTA requests that the Panel does not rely on this measure as mitigation unless its statutory and technical feasibility has first been confirmed with NZTA.

7. Improvements to the Remarkables Ski Field Access Road/SH6 access

7.1. NZTA considers that improvements to the Remarkables Ski Field Access Road/SH6 access should be operational before the corresponding stages of the proposed development commence operation. The improvements should address the development's safety and efficiency effects, taking account of existing capacity constraints, additional development related demand and the potential for private vehicle demand to exceed the ITA forecasts if the assumed mode shift is not achieved.

7.2. The form of the permanent access improvement should be supported by an assessment demonstrating that it can safely and efficiently accommodate the forecast demand associated with the relevant development stage, together with the applicable background SH6 demand. This assessment should include an appropriate sensitivity scenario where the mode shift assumed in the ITA is not fully achieved. The assessment should demonstrate that the proposed access arrangement appropriately manages both the capacity and safety effects associated with the additional traffic generated from the development.

7.3. NZTA does not support reliance on future publicly funded state highway improvements to mitigate these effects. No funding has been secured and no business case has been completed to establish the form, timing or funding of the Southern Corridor infrastructure improvements. Therefore, there is no assurance that wider network improvements will be delivered within a timeframe that responds to the proposed development or will provide the mitigation it requires. NZTA considers that the necessary development related improvements at the private access should be determined, delivered and funded by the Applicant, with consent conditions requiring their completion before the corresponding stage commences operation.

8. Proposed transport conditions

8.1. NZTA seeks amendments to the proposed transport conditions to ensure that effects on the safe and efficient operation of SH6 are appropriately managed. The conditions should secure access improvements before the corresponding development related demand occurs and effective, measurable travel demand management measures to achieve the mode shift relied upon in the ITA. NZTA's comments on individual conditions are set out below.

8.2. **TRANS.1 – Timing of access improvements**

NZTA does not support determining whether access improvements are required only after the Doolans Base Building becomes operational. The ITA and existing operating conditions already identify capacity and operational constraints, and the proposed development will generate substantial additional demand. NZTA seeks an amendment to the proposed conditions requiring the necessary mitigation at the access with SH6 to be identified, approved, funded and implemented before the Doolans Base Building commences operation or the relevant increase in traffic generating activity occurs, whichever is earlier.

8.3. This requirement would ensure that infrastructure needed to manage the development's effects on SH6 is operational before those effects arise. For the reasons outlined in Section 7 above, the condition should not rely on future public investment; the necessary development related mitigation should be delivered and funded by the Applicant.

8.4. **TRANS.2 – Upfront mitigation and ongoing monitoring**
NZTA seek an amendment requiring the relevant access improvements to be completed before the additional demand associated with each development stage occurs. Monitoring after operation commences should not determine whether mitigation of already identified capacity and operational constraints is required.

8.5. Monitoring should assess whether the completed mitigation remains effective and whether further measures are required as demand changes. TRANS.2 should therefore distinguish between mitigation required before operation commences and subsequent monitoring of its effectiveness.

8.6. **TRANS.3 – Reliance on temporary traffic management**
NZTA does not support TRANS.3 insofar as it provides for recurring TTM as the principal means of accommodating permanent development related demand. As outlined in Section 6, the current left turn departure arrangement generates additional SH6 movements and is not an appropriate long term substitute for a permanent solution at the access.

8.7. Given the duration and annual recurrence of the ski season, NZTA seeks that this condition be deleted as it relates to the state highway network, as ongoing reliance on this measure is not considered an appropriate form of mitigation for the effects associated with the activity.

8.8. **TRANS.4 – Temporary traffic signals**
Consistent with its comments on TRANS.3, NZTA seeks an amendment to ensure that recurring TTM, including temporary traffic signals, is not relied upon to provide the additional operational capacity required by the proposed development. An appropriate permanent solution for the access should address the safety and efficiency effects of that additional demand.

8.9. If temporary traffic signals are contemplated, NZTA requests that the Panel does not rely on them as mitigation unless their statutory and technical feasibility has first been confirmed with NZTA. Such confirmation should not remove any requirement for permanent infrastructure necessary to mitigate the development's effects.

8.10. **TRANS.10(a) – Park and ride and mode share measurement**
NZTA seeks an amendment to TRANS.10(a) recognising that the proposed park and ride facility may reduce vehicle demand on the ski field access road but does not necessarily reduce private vehicle demand on SH6. Visitors driving along SH6 to reach the facility continue to generate state highway trips before transferring to a shuttle.

8.11. The condition should distinguish between passengers travelling directly by bus from offsite origins, such as Queenstown or Frankton, and visitors driving to the park and ride facility. This distinction is necessary to establish whether the reduction in private vehicle demand on SH6 relied upon in the ITA is being achieved.

8.12. **TRANS.10(b) – Travel demand management and monitoring**
NZTA supports measures that reduce private vehicle trips associated with the ski field but seeks

amendments to TRANS.10(b) to secure clear, measurable mode share outcomes supported by specific travel demand management measures. These should address the frequency and convenience of bus services and consideration of pricing mechanisms that provide a meaningful incentive to use alternatives to private vehicles.

8.13. As noted in Section 5, free ski field parking and the approximately $49 return bus fare provide limited financial incentive for bus travel. The condition should provide for measures capable of influencing travel behaviour, potentially including reduced bus fares and parking charges, alongside ongoing monitoring of actual mode share. Where the required outcomes are not achieved, TRANS.10(b) should require additional or strengthened measures, rather than simply record the shortfall.

8.14. **Summary of amendments sought on conditions**
NZTA seeks a condition framework that requires permanent access improvements and travel demand management measures to be implemented before the corresponding development stage commences operation. Subsequent monitoring should verify their effectiveness, with additional mitigation required where the specified mode share or transport outcomes are not achieved.

8.15. This framework should not rely on post development monitoring, recurring TTM, uncertain future public investment or unverified mode shift assumptions as substitutes for necessary mitigation. The development related access improvements should be delivered and funded by the Applicant before the corresponding stage becomes operational.

9. Conclusion

9.1. NZTA does not oppose the proposed expansion of the Remarkables Ski Area in principle. However, further information and amendments to the proposed transport conditions are required to demonstrate that the additional effects on SH6 will be appropriately managed. In particular, NZTA seeks further justification of the ITA's mode share assumptions and sensitivity testing of higher private vehicle demand, to inform the mitigation required at the Remarkables Ski Field Access Road/SH6 access and across the wider Southern Corridor.

9.2. NZTA considers that the necessary permanent access improvements should be identified, approved, funded and implemented by NZSki before the corresponding stages commence operation. Recurring TTM and future public investment should not be relied upon to accommodate development related demand. No funding has been secured and no business case has been completed to establish the form or timing of the Southern Corridor infrastructure improvements.

9.3. NZTA seeks amendments to TRANS.1–TRANS.4 and TRANS.10 to secure upfront access mitigation, effective travel demand management measures, measurable mode share outcomes and ongoing monitoring, with further measures required where those outcomes are not achieved. NZTA requests that the Panel seek the further information and condition amendments outlined above from NZSki, and that the resulting assessment and revised conditions be provided to NZTA for further comment.