Before the Expert Panel appointed under the Fast-track Approvals Act 2024

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

Statement of Evidence of **Yvonne Pfluger** on behalf of NZSki Limited in response to Section 53 Comments

Landscape

Dated: 3 November 2026

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INTRODUCTION

1. My name is Yvonne Pfluger. I am a registered landscape architect and have practiced for over 25 years. I am a partner in Boffa Miskell Ltd (**BML**) and have been based in Queenstown for eight years. I have assisted several District/ Regional Councils in the South Island with the review of their plans by preparing territorial landscape studies. I specialise in preparing landscape and visual assessments for development projects within sensitive environments, as well as presentation of evidence for Council and Environment Court hearings, mediation and expert conferencing. I have prepared numerous landscape assessments for a variety of projects, including resort and residential developments through to large-scale infrastructure developments, including airport, port, ski field, renewable energy and roading projects.

2. I regularly provide peer reviews and advice on consent applications to the EPA and various councils, including for MDC, QLDC and CODC where I am a member of the peer review panels. I am also a Certified Environmental Practitioner under the EIANZ, and a Certified Independent RMA Commissioner.

3. This statement is given as part of NZSki Limited's (**NZSki**) response to comments on the Remarkables Ski Area Upgrade and Doolans Expansion (**Project**) made under Section 53 of the Fast-track Approvals Act 2024 (**FTA**). This statement responds to specific comments raised by:

   (a) DOC Expert Statement Landscape – Jeremy Head, 12 October 2026.

   (b) Addendum to Statement of Advice – Jeremy Head, 27 October 2026.

   (c) DOC Expert statement Geomorphology – David Barrell.

   (d) QLDC/ CODC - Additional Peer Review Memorandum Regarding Landscape and Visual Effects Assessment – Ben Espie, 14 October 2026.

   (e) Kā Rūnaka, Statement of Evidence of Dr Alayna Rā, 27 October 2026.

   (f) Kā Rūnaka Treaty Rights and Interests Statement Remarkables Ski Area Upgrade and Doolans Expansion, 27 October 2026.

   (g) Kā Rūnaka, Statement of Evidence of Dr Gail Tipa, 27 October 2026.

   (h) Kā Rūnaka, Statement of Evidence of Edward Ellison, 27 October 2026.

   (i) Kā Rūnaka, Comment and Legal Submissions, 27 October 2026.

4. My original findings are provided in full in the Remarkables Ski Area Upgrade & Doolans Basin Ski Expansion Landscape Effects Assessment (**LEA**) prepared for NZSki Ltd, dated 7 May 2026.

5. Peer reviews of the LEA were provided by DOC (Jeremy Head Landscape Architect, dated 18 August 2026) and by QLDC/ CODC (Ben Espie Landscape Architect, dated 3 July 2026) and I provided a response to the matters raised in a Memorandum dated 27 August 2026.

6. Although this is not an Environment Court proceeding my confirmation of compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 is included in Section 1.4 of my LEA report, submitted as part of the substantive application.

SPECIFIC RESPONSE TO COMMENTS

Visual Effects Gondola Mid Station from Rastus Burn

7. There is general agreement between me (landscape expert for NZSki) and the landscape experts for DOC (Jeremy Head) and CODC/ QLDC (Ben Espie) regarding the level of effects and rationale regarding the visual and landscape effects of the proposal. I note that the landscape expert for Kā Rūnaka (Dr Alayna Rā) differs in her views, as outlined in the final section of my evidence on cultural landscape effects.

8. Following the review of the LEA, there was a small discrepancy in the assessment of the level of visual effects (overall moderate on Rastus Burn side and high on Doolans side), where Mr Head considered that the mid station will have a localised effect that is greater than moderate. In paragraph 25 of his peer review dated 18 August 2026 Mr Head considered that "*the mid-station building and associated elements as described will likely give rise to a 'High' level of adverse landscape effect due to its location in what is currently a highly natural part of the basin and ridgeline*." He remains of the view, "*that the effects of the midstation gondola building will likely have a localised level of effects that will lift the overall effects on landscape character generated by the proposal in the Rastus Burn above 'Moderate' to 'Moderate-high*'."

9. Following the preparation of Mr Head's Statement of Advice three additional visual simulations were prepared in response to a Request for Further Information by the Panel.[1] The additional visual simulation from FTR VS1 shows a view of the proposed mid station from the Rastus Burn side of Helicopter Ridge. As described in the LEA,

[1] RFI 1 Response - Boffa Miskell, Memo - Additional Visual Simulations, 13 October 2026.

views to the mid station building from this side are limited to long-distance viewpoints, such as those located along the ski field access road and in the vicinity of the base building. As the viewer approaches Helicopter Ridge from the north-west, the proposed retaining wall that will be required for the creation of a flat platform below the mid station will be the main element visible on the ridge, with the proposed structure obscured.

10. While the Mid Station would break the skyline of Helicopter Ridge to a minor extent in the long-distance view at 3.5km away on the ski field access road, in these views the structure is a comparatively small element. However, the structure would be out of view from the base building and viewpoints closer to Helicopter Ridge. The additional visual simulation FTS VS 1 illustrates further that the structure would not be visible on the skyline as the viewer approaches within the existing Remarkables ski field. While the mid station building will not be visible, the earthworks required to establish the structure, including the proposed retaining walls and lift towers, would form part of the visible ridgeline. For more distant views, the mid station will partially appear on the skyline (see visual simulation 3).

11. The visual simulation FTR VS2 illustrates the mid station in close-up views along the ridgeline to show the cut (Doolans side) and fill (Rastus Burn side) required to construct the platform. It is acknowledged that the visual effects of the mid station will be high when viewed within its immediate context along the ridge or from immediately below on the Doolans side. However, I maintain the view that visual effects of the mid station from the Rastus Burn side are mostly moderate, as the retaining wall partially obscures the structure in short-distance views and in long-distance views the structure is a relatively small element on a rocky ridgeline.

12. Based on Mr Head's Statement of Advice dated 12 October 2026 (Page 8, Para 29), he considers that this discrepancy regarding the visual effects of the mid station from the Rastus Burn catchment has been resolved as follows: *"Having reviewed Ms Pfluger's 'View Comparison' visualisations and the Applicant's further information on retaining-wall construction (discussed below), J Head agrees that the overall effects on the Rastus Burn side will be 'Moderate' adverse. This equates to a 'more than minor' adverse effect under the RMA scale and is, I believe, a fair appraisal given the current level of modification in the catchment."*

Earthworks and Retaining Walls

13. As stated by Mr Head (Page 6, Para 21), *"points of disagreement limited to the landscape effects of the proposed mid-station building and its attendant earthworks and retaining wall."* The effects of the mid station and the subsequent resolution of any differences in opinion are addressed in the previous section.

14. A conference call was held on 3 August 2026 with representatives of the two councils, DOC and the applicant's team to ascertain what further work and information is required to satisfy the peer reviewers' information requirements. In this call, Mr Head requested additional graphic material to better understand how the mid station integrates into the local landscape context, including the retaining walls (up to 8.5 m high and 70 m long) that is proposed below the mid-station building. In his Statement of Advice dated 12 October 2026 Mr Head (Page 10, Para 35) opines that *"any large retaining walling should be as unobtrusive as possible. Further confirmation from the Applicant would provide greater certainty about how the retaining walls will be built. An overtly engineered construction methodology, such as smooth vertical concrete, is not yet ruled out and would be inappropriate in such a highly natural setting."*

15. The application shows areas where retaining walls may be required due to the height of the proposed cut or fill and Section 3.3 of the LEA explains the proposed earthworks and retaining walls.

16. The detail design of earthworks based on underlying local geology will be required to determine the exact extent and height of retaining walls and cuts, but the LEA has assumed the worst case scenario as stated on the plans. Depending on snow conditions, it is likely that the snow would cover the cut/fill areas near Helicopter Ridge in winter, apart from areas where vertical retaining walls are required. As visible in Figure 1 of Mr Head's Statement of Advice, snow cover can vary and unnatural lines created by earthworks can be accentuated in certain conditions. This effect is, in my view, similar to the difference in colour of scree/ rock on cut slopes in summer. His Figure 1 shows the earthworks of the existing ski field access road below the snow-covered slopes which form a visible element on the lower slopes of the northern face of the Remarkables.

17. It is understood that the majority of cut and fill batters can be rehabilitated by transplanting snow tussocks when undertaking earthworks. This would reduce the visual effects of earthworks in areas where snow tussocks are currently present, such as the lower part of the Doolans catchment. High-lying, wind-exposed ridgelines currently contain rock or scree with limited cushionfield and herbfield vegetation. It is understood that these cannot be transplanted and exposed scree or rock will remain in these areas.

18. Based on the Construction Management framework, where level changes, space constraints, ground conditions, or construction requirements require additional support, retaining structures and batter slopes are incorporated into the earthworks methodology. Retaining and slope support solutions are selected to suit:

    (a) Local ground conditions and geotechnical recommendations.

    (b) Height and extent of cut-and-fill interfaces.

    (c) Constructability within constrained alpine environments.

    (d) Long-term performance and integration with permanent works.

19. Where practicable, geogrid-reinforced slopes are preferred in place of structural retaining, as these can reduce reliance on conventional wall systems and support more landform-responsive outcomes. Their suitability will depend on the availability and performance of fill material capable of meeting the required engineering specification.

20. Where geogrid-reinforced slopes are not suitable, other retaining solutions may be adopted to respond to local conditions and constructability requirements. These may include gabion retaining structures, or timber pole and lagging walls, including where necessary supplementary support such as buried ‘deadman’ anchors / piles.

21. The final retaining solution adopted in any location will be informed by detailed design and geotechnical assessment. For the purposes of the FTA application, indicative wall extents, lengths, and heights have been identified to define the assessed construction methodology and effects envelope. NZSki now proposes consent conditions that limit the retaining wall structures to either gabion baskets or natural rock or rock-faced walls. If concrete walls are required, a facing of natural local rock would be installed to achieve a natural appearance. The example images (Images 1-3) below show rock and gabion basket retaining walls around the existing base station and large scale earthworks within Sugar Basin that did not require retaining walls.



Image 1: Rock retaining wall below base station drop off area



Image 2: Gabion basket retaining wall adjacent to base station



Image 3: View of existing earth-worked areas within Sugar Basin where a terrain park was created.

22. I concur with what Mr Espie states in para 15(3) of his statement (27 October 2026) that "*it was agreed that stacked rock or rock filled gabions would be suitably visually recessive and would visually blend with their context, while other materials (such as plain concrete) would not*." In his opinion, rock facing is also appropriate and that a condition requiring retaining structures to be of gabion baskets or stone facing should be included. As outlined above, I support this approach.

23. As shown in Image 4, unnatural lines are less distinguishable within the high-lying areas where the earthworks occurred within scree than where they occurred within existing vegetation. The viewshaft within the basin where Helicopter Ridge and the proposed return trail to Curvey Basin would be visible is narrow and at least 10km away, as shown on the ZTV mapping provided with the application.



Image 4: Zoomed in photo from Whakatipu Basin where existing Curvey lift and earthworks for creation of ski tracks is visible. The proposed cut for the return trail from Helicopter Ridge would be visible to the left.

Geomorphology of the Doolans Basin

24. The notable geomorphology of the Doolans Basin was outlined in detail in Mr Barrell's Statement of Advice and referred to by Mr Head in relation to its landscape values as a geomorphological feature. Mr Head (Page 15, Para 45) considers that "*other than the high geomorphological values associated with the moraine sequencing missing from the Applicant's reporting, J Head, generally satisfied that the Applicant's assessment provides a reasonable basis for understanding the likely landscape effects of the proposal."*

25. Mr Head considers (Page 6, Para 21) that the geomorphology of the Doolans Basin needs to be addressed. In Section 4.2.1.1 of the LEA, the geomorphology of the project area is described under the physical values of the landscape[2]. For the preparation of the LEA, a review of the New Zealand Geopreservation Inventory[3] (Inventory and Maps of Important Geological Sites and Landforms in the Otago Region, edited by Kenny & Hayward, Geological Society of New Zealand Miscellaneous Publication 99) was undertaken[4].

[2] P.11: The landscape is characterised by a highly articulated alpine geomorphology dominated by steep schist slopes, extensive scree fields, and large-scale post-glacial landslide formations. These landforms exhibit a high degree of visual and structural complexity, representing active erosional and depositional processes.
[3] https://maps.main.net.nz/mapstore/#/viewer/openlayers/792.
[4] P.11: Key geological features such as the Remarkables Terrane Boundary, Block Field, and the Lake Alta cirque represent regionally and nationally significant Geopreservation Sites.

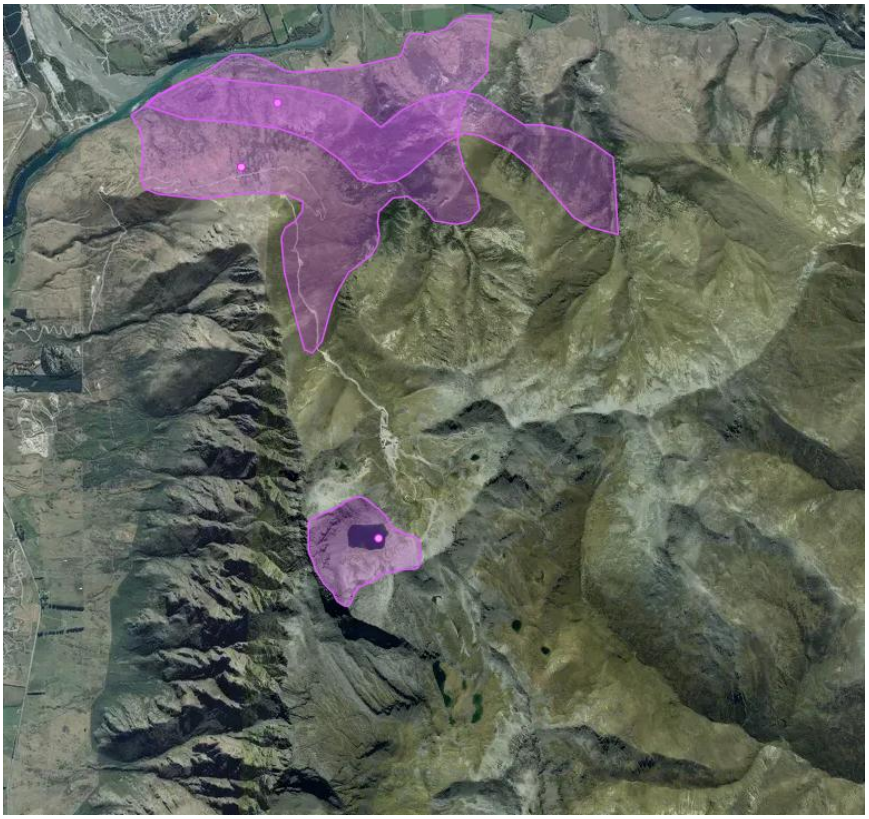


Image 5: Geopreservation Sites in vicinity of the project area.

26. The closest identified Geopreservation Site is Lake Alta,[5] with the Frankton Block Field[6] and Remarkables Terrane[7] located below the ski field road in the lower reaches of the Rastus Burn. No Geopreservation Site has been identified within the project area of the Upper Doolans Creek Right Branch (see Image 5 below).

27. The Blakely Wallace Associates; Kawarau Remarkables Conservation Area Landscape and Visual Assessment; 2010 (p10-11) described the landscape character area that the Doolans Basin falls into as follows: "*The Nevis side (within the CA) includes the rugged, spectacular glaciated peaks and alpine zone including the many glacial and peri-glacial features common to the whole of the summit area. These characteristics include high alpine cirque basins, small lakes or tarns contained within the high basins, nivation features, large areas of bare rock, scree and long periods of snow lie.*"

28. I agree with Mr Head (Page 11, Para 38-39) that, *"geomorphological processes are central to the physical landscape"* and that, *"the basin's geomorphological expression is a key contributor to its landscape character and its natural values."* While the LEA, *"does not interpret the various features as distinct geomorphic*

[5] A classic lake-filled cirque with steep rocky sides and back, and patches of moraine over schist bedrock at the front lip.
[6] A good, accessible example of a block field with a debris slide close by.
[7] The best exposed and most easily accessible section of the Caples/Aspiring terrane boundary.

features or explain their formative processes", Section 8 of the LEA concluded (p.54) that, "*the Doolans Basin, by comparison, has high values relating to fauna, flora and geomorphological processes and the integrity of the landscape in this part of the Site is currently very high*." In light of the additional geomorphological information provided by Mr Barrell (which neither Mr Espie, Mr Head nor I were aware of), this conclusion still applies.

29. I agree with Mr Head (Page 12, Para 40) that, *"earthworked and non-earthworked groomed trails and the earthworked Doolans access road traverse the lower five ridges of the moraine sequence. Because of this, parts of the moraine sequence will be physically and permanently altered through landform modification."*

30. However, given that only part of the moraine sequence will be modified I consider that the landscape effects associated with the modifications to the physical and perceptual values, in particular its legibility and aesthetic attributes, I consider the effects to be high as outlined in the LEA and not very high as assessed by Mr Head (Page 12, Para 41)[8]. Mr Head (p13 para 41) and I agree that "*the overall adverse effects at the basin-wide scale will remain '**High**'.*"

31. Mr Barrell suggests (Page 14 Para 42) that "*mitigations could include reconfiguring the proposed development to avoid this landform feature, or the collection of scientific information prior to development."* I agree with Mr Barrell that it would be prudent to collect scientific information from the moraine, given its apparent importance based on Mr Barrell's evidence, before any modifications through the ski trail and proposed reservoir storage occur. I understand that the ski/ access track was located in this area east of the gondola alignment due to gradient requirements and to avoid ecological values, in particular wetlands/ seepages and vegetation communities. Any realignment of infrastructure and earthworks would give rise to different effects which would need to be assessed separately.

32. An addendum was provided by Mr Head on 27 October 2026, separately assessing the potential to utilise water from Lake Alta for snow making. He considered the reduction of effects on Tarn 3 in the Doolans Basin and minimisation of earthworks effects on the moraine described above (para 6-8). In his view, the alternative water source for snow making would reduce the effects on the Doolans catchment. He considers that, "*if the application was revised to avoid the loss of Tarn 3 and avoid the proposed infrastructure between it and the Doolans Creek water intake, and notwithstanding any adverse effects at an alternative water source location, levels of adverse effects on landscape character (partly informed by changes to natural character) at the Doolans Basin-wide scale would, in my opinion, reduce slightly to*

[8] Because of the value and rarity of the moraine landforms in the Doolans Basin, Mr Head's opinion is that any earthworks modifications will have a 'Very high' adverse effect on the moraine sequence.

'Moderate-high' ('More than minor') overall, but no lower than this. The moraine sequence would still be compromised by other ski field infrastructure and earthworks, with a 'Very high' localised adverse effect on this natural feature."

33. While I agree that the landscape and natural character effects on Tarn 3 and the Doolans catchment would be lower, I consider the alternative of effects on Lake Alta to be at least high adverse since pumping infrastructure and extensive earthworks will be required to convey the water into the Doolans catchment over 1km away. Currently, Lake Alta is largely unmodified and highly frequented by visitors year-round. I do not consider that high adverse effects on this identified Geopreservation Site would be preferable to the water take from Doolans Creek Right Branch.

34. The mixing of waters from two different catchments may also give rise to cultural impacts; however, Kā Rūnaka would need to speak to this aspect.

Landscape Management Plan

35. In his Statement of Advice, Mr Head (Page 14/15, Para 44) considers that a dedicated Landscape Management Plan or Landscape Monitoring Plan is critical in light of the magnitude of change being proposed in the Doolans Basin. In his view, this landscape management plan should include the following:

    (a) Landscape monitoring by a landscape architect.

    (b) Landscape compliance reporting.

    (c) Photo-point landscape monitoring.

    (d) Landscape performance standards.

    (e) Review triggers where rehabilitation does not achieve specified landscape outcomes.

    (f) Independent certification of landscape rehabilitation success.

    (g) Ongoing monitoring of visual effects after operation commences.

    (h) Visual treatment of retaining walls.

36. As outlined above, I agree that the visual treatment of retaining walls should be included as a condition. I also largely agree that, "*landscape-related conditions proffered by the Applicant rely largely on rehabilitation, colour controls, planting, ecology/monitoring and management plans."* While I consider that a dedicated Landscape Management Plan or Landscape Monitoring Plan would provide similar information to monitoring the ecological performance of rehabilitation or earthworks

areas, there may be merit in landscape monitoring in relation to assessment of mitigation of long-term effects.

37. In my view, the successful rehabilitation of earthworks is crucial in terms of managing landscape effects, however there may be an overlap in terms of the results of ecological monitoring in terms of the success of mitigation (e.g. survival of relocated tussocks in Doolans Basin following earthworks).

38. The effectiveness of this revegetation process in achieving the mitigation in the timeframes anticipated could be addressed through a landscape management plan as suggested by Mr Head. This would provide some flexibility to account for challenges associated with plant growth and survival and appearance of cut/ batter slopes in this dynamic alpine environment. This could consider contingency measures if the proposed mitigation measures are insufficiently effective to provide effective mitigation.

39. A range of more 'static' landscape and visual effects raised by Mr Head have already been addressed through conditions, such as lighting, colours of buildings and structures, earthworks and the addition of conditions relating to retaining walls. Dynamic aspects, such as ongoing performance of planting over time and appearance of earthworks, could be addressed through a separate landscape management plan. Alternatively, it may be possible to incorporate these matters as part of an ecological monitoring plan that recognises the dual purpose the planting provides (however, this would only be useful if the landscape matters are all vegetation related).

Cultural Landscape Effects Assessment

40. Kā Rūnaka have provided evidence on landscape and visual effects from Dr Alayna Rā, who raises concerns (para 12a) that the LEA:

> *"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."*

41. Dr Rā considers that, "*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.*" In her view, the LEA contains the following deficiencies and inconsistencies (para 12c):

    (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.

Assessment of Landscape Effects

42. I did not attend the site visit with Kā Rūnaka representatives (23 January 2026) and have not been provided with the early guidance on Kā Rūnaka expectations by the LEA Advisor for Kā Rūnaka in terms of methodology and approach for the landscape and visual assessment (13 February 2026). For the preparation of the LEA I reviewed the report, 'Remarkables Conservation Area, Summary of Ngāi Tahu Values, Practices and Associations' (Kauati, Dec 2020) to gain an understanding of the cultural values, associations, and practices present in the Remarkables Conservation Area, as outlined in section 4.3.1.3 Associative Values. As stated on p.18 of the LEA, the "*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, and no Cultural Values Assessment has been prepared by Ngāi Tahu for the proposal.*"

43. As stated in a joint statement between Kauati and Isthmus: [9]

    "Āpiti Hono Tātai Hono and Te Tangi a te Manu methodologies have different purposes. Āpiti Hono Tātai Hono details how Ngāi Tahu ki Murihiku understand that place and what is and is not appropriate. Te Tangi a te Manu is a framework to undertake tailored landscape assessments within a statutory planning context. There are matters that Te Tangi a te Manu considers and assesses, such as significance, that sit outside the functionality of Āpiti Hono Tātai Hono, and vice versa. These two methodologies work alongside each other; they do not misappropriate, isolate, or validate points raised in the other. They respectively

[9] Memorandum to Fast Track Panel for Hananui Aquaculture Project, dated 21 November 2025, prepared by Ailsa Cain (Kauati) and Brad Coombs (Isthmus).

> *identify and contextualise relevant matters and are clear as to how and why the respective assessments are undertaken. In reading them together, the two methodologies intersect at appropriateness and effects rather than cultural contexts and definitions."*

44. In my view, mana whenua have the appropriate framing, mātauranga, and methodology to determine the understanding of cultural effects. In light of that I consider it more appropriate for me to use their work and link my assessment to these findings rather than validate their findings or speak on behalf of mana whenua, I acknowledged (and still acknowledge) that the landscape value assessment has some limitations due to the extent of information available at the time. I support the approach to integrate the findings of the assessment of cultural effects into my landscape assessment, as established best practice by Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines (**TTatM**) (NZILA, 2022). I, therefore, have reviewed the evidence provided by Kā Rūnaka to assess if the information provided on 27 October 2026 in relation to cultural values and effects requires amendments to my findings in the LEA.

45. While the evidence from Dr Alayna Rā does not provide information about the values and effects, I consider that the Treaty Rights and Interests Statement and Mr Edward Ellison's evidence provided particularly helpful context and outline their understanding of place.

46. In relation to para 15 in Dr Rā's evidence, which refers to landscape hearing for the Bendigo-Ophir Gold Project Fast Track Application[10], I note that in the same transcript the Panel Chair Hon Mr Muir KC states that *"we just got to make sure that in our process we don't – if I could use a shorthand – double count."*[11]

47. Dr Rā's evidence (para 14) highlights that the LEA (p.14), "*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*" but, "*treated as contextual information rather than matters which materially inform the assessment of landscape effects*".

48. In para 17 Dr Rā expresses the criticism that, *"cultural landscape values are therefore relegated only to associative values"* and that, "*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 hikoi".* Based on my review of the Kā Rūnaka report, evidence and legal submission, I understand that Kā Rūnaka

[10] on 9 June 2026 (Transcript at 11:14–21)
[11] P 12: https://www.fasttrack.govt.nz/__data/assets/pdf_file/0021/31395/09-June-2026-Landscape-hearing.pdf.

evidence identifies effects extending beyond the immediate development footprint, including effects on the integrity and experience of the ancestral landscape, access and customary relationships, taoka species, kaitiakitaka, and the ability to transmit mātauraka and cultural identity between generations.

49. Kā Rūnaka evidence highlights[12] that, "*the Kawarau, Doolans Basin, Whakatipu Waimāori and the Kawarau River are not discrete geographic features or isolated mapped sites, but form part of an interconnected ancestral and wāhi tīpuna landscape that needs to be considered at this scale.*" Based on the report findings:[13]

> *"Whakatipu catchment must be understood as a unified ki uta ki tai system, where:*
>
> *(i) the mauka are the origin of life and authority*
>
> *(ii) these mauka, and the associated puna and awa are the pathways through which that life moves*
>
> *(iii) the lakes are dynamic nodes within a connected network, not contained basins*
>
> *(iv) and all downstream environments are directly shaped by conditions at the headwaters"*

50. It is understood (p.33) that, "*what occurs at the mauka determines the condition of the wai, and therefore the health and wellbeing of the entire landscape system.*" The fact that (p.34) the highest peaks "*represent the closest physical and visual point of connection with the atua and that this proximity is not abstract, it is experienced through elevation, exposure, and visibility*" means that the cultural impacts of the proposal would affect physical, perceptual and associative attributes of the landscape. The continuous movement of people, water, plants and animals (including taoka species) across interconnected domains forms part of a nested system within the wider ki uta ki tai framework (p.35).

51. In relation to mahika kai (p.36), "*the cultural significance of the project area derives not from the presence of a single resource or harvesting site, but from its position within the wider Whakatipu catchment and te riu hopuwai o Kawarau."* The seasonal journeys along ara tawhito that linked coastal settlements with inland lakes, rivers, valleys and alpine environments enabled whānau to access a diverse range of resources and were fundamental to the exercise of ahi kā, the maintenance of cultural knowledge and the transmission of mātauraka between generations. As a result, the value of the project area extends beyond its immediate capacity to support resource harvesting and includes its role in sustaining the wider cultural and

[12] Treaty Rights and Interests Statement, p.32.
[13] Ibid, p.33.

ecological systems upon which mahika kai systems and practices depend. Protection of water quality, habitat integrity, ecological connectivity and natural processes is therefore inseparable from the protection of mahika kai values.

52. These vegetation communities detailed in the ecological assessment (e3Scientific) are, "*significant not only as botanical assemblages but as the habitat base supporting taoka species and potential rauemi (resources/materials)*."

53. In relation to landscape effects, the LEA found that (p. ii of executive summary) within the lower part of the Rastus Burn catchment would be low overall within the Rastus Burn catchment, since the existing ski field development has modified landscape character and lower gondola alignment, would be perceived as consistent with the established ski field context. However, moderate adverse landscape effects are identified where new infrastructure extends into less modified areas, particularly around the gondola mid station on Helicopter Ridge and along the associated ski return trails. In contrast, within the Doolans Basin, the proposal was assessed as resulting in high landscape effects, as the introduction of buildings, gondola infrastructure, ski trails and associated activity into a previously undeveloped alpine basin would noticeably reduce landscape naturalness, intactness and sense of remoteness.

54. Mr Ellison (para 52-53) explains that the "*Doolans Basin is a significant wāhi tīpuna within the wider ancestral landscape of mana whenua, where physical features, waterways, indigenous ecosystems, and cultural traditions are interconnected. A key concern is that the proposal would diminish the legibility and intactness of Doolans Basin as a wāhi tīpuna and ancestral cultural landscape. The proposal raises concern of potential for adverse effects on the legibility, intactness, customary experience, tranquillity, remoteness and the ability to recognise the landscape of the tīpuna.*" In my view, this supports the findings in the LEA assessment that the landscape effects in the Doolans Basin would be high, and would remain high following construction even in light of the proposed mitigation measures. Similarly, the impact on taoka species and mahika kai in the context of the proposed changes to the Doolans Basin ecosystem would support the conclusion that landscape effects would remain high in the long-term.

55. While the area affected by the landscape change is spatially and visually confined within a small part of the wider ONL as stated in the ONL, it is understood based on Kā Rūnaka evidence that the effects need to be assessed in the context of the inherent ecological and cultural interconnectedness when assessed at the scale of te riu hopuwai o Kawarau as a culturally cohesive landscape unit, rather than being confined to the proposal's physical footprint. The legal submissions outline (para 69) that the proposal, "*would alter the character, integrity and functioning of the wider*

landscape and, in turn, affect the ability of Kā Rūnaka to maintain relationships with that landscape and to exercise the rakatirataka, kaitiakitaka, rights and responsibilities recognised through the Ngāi Tahu Settlement framework." In my view, this is more applicable to the currently unmodified landscape in the Doolans Basin, where landscape effects were assessed as high.

56. In summary, Kā Rūnaka evidence brings cultural perspectives that deepen my understanding of the landscape's values and the implications of the proposal across its physical, perceptual and associative dimensions. It reinforces my assessment of high adverse landscape effects in Doolans Basin and explains how effects on cultural relationships extend beyond the basin itself. Having considered these perspectives, I retain the LEA's landscape effects ratings, while recognising that, from a mana whenua perspective, the spatial and visual extent of change alone does not fully capture the significance of those relationships or the effects on them.

Assessment of Natural Character Effects

57. I consider that Dr Rā's interpretation of TTatM in relation to natural character is unclear and somewhat misleading. In para 20 she states that "*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)*" which is correct; however, she omits that TTatM in this context (para 9.05, second bullet point) refers to Policy 13(2) of the New Zealand Coastal Policy Statement which refers to the following matter. Notwithstanding that this application falls well outside the coastal environment, it is these relevant matters which have all been addressed in the LEA[14].

> *(2) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:*
>
> *(a) natural elements, processes and patterns;*
>
> *(b) biophysical, ecological, geological and geomorphological aspects;*
>
> *(c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;*
>
> *(d) the natural movement of water and sediment;*
>
> *(e) the natural darkness of the night sky;*
>
> *(f) places or areas that are wild or scenic;*
>
> *(g) a range of natural character from pristine to modified; and*

[14] New Zealand Coastal Policy Statement, Policy 13(2).

(h) experiential attributes, including the sounds and smell of the sea; and their context or setting.

58. Hence, I disagree with Dr Rā's finding (para 20) that "*the LEA is therefore methodologically inconsistent with TTatM in how it defines natural character.*" I also note that case law (*Preserve New Chum* [2025] NZHC 2688) supports my view, as the Court (paras 26 and 48-49) treats naturalness as the underlying concept connecting the characteristics and qualities contributing to natural character. Importantly, *"Since mātauranga Māori and tikanga do not affect the naturalness of an environment, decision-makers to whom s 6(a) and Policy 13 are directed are not required to adjust this aspect of their decision-making.*"

59. I also disagree with Dr Rā that it is inappropriate to assess the natural character effects individually on the various freshwater features (tarns, seepages, streams and wetland areas), given that the level of effect will differ substantially, with some not being affected at all. I consider that Dr Rā's conclusion (para 21(c)) that "*the LEA therefore lacks internal consistency in its natural character effects ratings, rendering it incomplete and unreliable*" to be broad-brush and not based on best practice guidance in TTatM.

60. It is correct that the natural character assessment in the LEA does not address the catchment-wide effects on freshwater in relation to the Doolans and Rastus Burn catchments, which both drain into the Kawarau River. In para 22, Dr Rā opines that, "*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"*. While I agree that water underpins the functioning of a wide range of ecosystems in the broadest sense, the LEA assesses natural character with a focus on environments that fall under s6(a) of the RMA. In my view, Dr Rā conflates ecology, landscape and natural character concepts in her para 23, which reflects the holistic view that mana whenua take but does not align with TTatM.

Assessment of Cumulative Effects

61. The Kā Rūnaka legal submissions outline (para 62) that "*Dr Rā considers that the Applicant's assessment fails to recognise the inherent ecological and cultural interconnectedness of the wider landscape and catchment, and that cumulative effects should be assessed at the scale of te riu hopuwai o Kawarau as a culturally cohesive landscape unit.*" Dr Alayna Rā considers that cumulative effects should be assessed at the scale of te riu hopuwai o Kawarau as a culturally cohesive landscape unit and that successive modification gives rise to increasing

intergenerational effects on cultural identity, practice and continuity of relationship with whenua and atua. As I understand it, this assessment needs to be undertaken across a range of expertise, not solely as a landscape assessment. While I appreciate and acknowledge that this comprehensive view of the natural resource at this scale relates to the broader system that mana whenua relate to, it has to be balanced, in my view, with 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. I note that the ecologists considered the cumulative effect of loss in vegetation on the wider ecological district, as described in the Ecological Assessment (e3Scientific), which I drew on to arrive at my conclusion in the LEA (p.50) that the cumulative effect at a broader scale would be low to moderate, while it would be moderate within the limited spatial extent of the upper Doolans Basin due to the number of components proposed (p.49).

62. In para 26, Dr Rā outlines that "*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.*" I agree that the effects of climate change is an issue worthy of consideration (also addressed by Dr Tipa and Mr Ellison), however, it is beyond the scope of my assessment and expertise. I therefore disagree with her view (para 28) that "*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.*"

Conclusion

63. Having considered the comments and additional evidence, I retain the landscape and visual effects conclusions in the LEA. Adverse landscape effects would remain high within Doolans Basin, while effects across the wider landscape would be more limited, reflecting the extent and visibility of the proposed changes and their landscape context. Geomorphological evidence from the Department of Conservation and cultural perspectives provided by Kā Rūnaka deepen my understanding of the values affected. I recognise that, from a mana whenua perspective, effects on the interconnected ancestral landscape and cultural relationships extend beyond Doolans Basin and cannot be understood solely by reference to the proposal's physical and visual footprint. The proposed conditions

and landscape monitoring would assist in managing adverse effects, but would not remove the enduring changes to landscape character.



Yvonne Pfluger

3 November 2026