

Before the Fast-track Panel

Under: Fast-track Approvals Act 2024

In the matter of: FTAA-2605-1236 – NZSki Limited Remarkables – Doolans Basin

Statement of advice: Jeremy Head
Landscape
Independent consultant
12 October 2026



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Introduction

1. My full name is Jeremy Everett Head.

Instruction

2. I have been requested to provide expert advice to the Director-General of Conservation (DOC/the Department) for the purposes of his comments on the Remarkables Ski Area Upgrade and Doolans Expansion Project Fast-track application.

Qualification and experience

3. I am an independent Consultant Landscape Architect based in Christchurch. I have a Bachelor of Landscape Architecture (hons) from Lincoln University (1993) and am a Registered member of the Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA). I have over 30 years' experience as a Landscape Architect including eight years experience working at Lucas Associates and four years experience working for WSP in Christchurch where I held the role of South Island Team Leader Urban Design. Otherwise I have been self-employed.
4. My role in this project to date includes peer review of the Applicant's draft Landscape Effects Assessment, including two conference calls - one with the Applicant and their landscape expert, Yvonne Plugger, along with Ben Espie (Queenstown Lakes District Council's and Central Otago District Council's landscape expert). The second conference call was with the Applicant's landscape expert, Yvonne Pfluger. Both conference calls and other correspondences have helped clarify project details, establish any points of agreement and distil any outstanding points of disagreement for the benefit of the Fast track Panel.
5. I have not conducted a site visit onto the site itself, but have regularly observed the Rastus Burn catchment from the Wakatipu basin while in Queenstown for other work, including since my engagement by DOC on this project. I am reasonably familiar with the setting as I have been heavily involved with the Queenstown Lakes District Council's team working on the Priority Area Schedules for the Proposed District Plan since November 2022 up until now. Otherwise, I

have relied on others' reporting of the site and its contextual setting and the project specifics.

6. I have a good understanding of the Applicant's Landscape Assessment of the project.

Code of conduct

7. Whilst it is acknowledged that this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of advice and expert opinion

8. My expert advice focusses on landscape and natural character and relates to the following:
 - i. Adequacy of the Applicant's Landscape Effects Assessment, including identification of any valued attributes that have not been assessed or have been insufficiently characterised.
 - ii. Adequacy of the Applicant's assessment of effects on existing natural landscape character and its values with specific reference to any values that are incomplete, understated, or not addressed.
 - iii. Adequacy of the Applicant's proposed mitigation, rehabilitation and management measures.
 - iv. Comments on conditions.

Material considered

9. In preparing this advice I have reviewed and rely on the following documents prepared by Yvonne Pfluger, Landscape Planner, Boffa Miskell Ltd as part of the application:

- **Remarkables Ski Area Upgrade & Doolans Basin Ski Expansion: Landscape Effects Assessment;** 7 May 2026 (Technical Report B-03) (herein referred to as the 'Landscape Report').
- **Remarkables Ski Doolans Extension: Graphic Supplement;** 6 May 2026 (Technical Report B-03.1).
- **Remarkables Ski Doolans Extension: Visual Simulation Graphic Supplements;** 7 May 2026 (Technical Report B-03.2, B-03.3 Parts 1 & 2).
- **Remarkables Ski Area Carpark & Bus Hub: Landscape Effects Assessment;** 5 May 2026 (Technical Report B-04).
- **Remarkables Ski Bus Hub & Carpark Graphic Supplement;** 5 May 2026 (Technical Report B-04.1).
- **Response to DOC QLDC and CODC re B.03 and B.04 Landscape, 27 August 2026** (included with the 4 September 2026 updated application documents), including the memorandum from Yvonne Plugger dated 26 August 2026, and the memorandum of Ben Espie, Vivian+Espie, prepared on behalf of Queenstown Lakes District Council and Central Otago District Council.

10. I have attended regular Microsoft Teams calls with DOC experts since late March 2026 to contribute to, share and discuss others' assessments of the project specifics. This has enabled me to better and more fully assess the landscape characteristics and values of the site and its contextual setting for the project.

Peer review methodology

11. The peer review methodology is based on that set out in Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines (TTatM) and utilises information lodged by the Applicant. As such this statement is largely desktop-based. The widely accepted NZILA Seven-Point scale has been used to help describe the landscape quality, the same scale that Ms Pfluger has used.
12. This statement forms an impartial and focussed appraisal of the Landscape Report and is not intended to be a parallel assessment.

Points of agreement with the applicant's Landscape Report

13. I broadly agree with the approach, content and conclusions reached in Sections 1.0, 2.0, 3.0, 4.0 and 5.0. Sections 6.0 and 7.0 have been further addressed by the Applicant since the Landscape Report was written and is supported by the 26 August Memorandum prepared by Ms Pfluger. In this regard there is now a high level of alignment between Ms Pfluger's conclusions and my own regarding the landscape effects and natural character effects of the project, subject to a few outstanding matters discussed later in this statement.
14. The Landscape Report has helped inform the design which is a generally encouraged approach - in theory any adverse landscape effects can be identified early on and responded to through an iterative design process (Section 1.2).
15. The Zone of Theoretical Visibility ('ZTV') analysis used is appropriate to help determine the extent and location of any potentially affected parties (Section 4.6). A ZTV is solely based on topographical change and as such will often illustrate a 'worse-case scenario' (Section 5.1). Further, the limitations of ZTV analysis are correctly stated.
16. The methodology in selecting public viewpoint locations is logical and broadly represents an appropriate range of views (Section 5.2).
17. The site and surrounding context have been visited several times by Ms Pfluger both with and without snow cover, enabling among other things, a fuller understanding of the effects of existing earthworks, buildings and structures in different seasons and therefore the likely effects of the project.
18. I agree with the explanation / definition of what 'natural character' means and how it is used in the Landscape Report (Section 4.5).
19. I agree that change is not of itself an effect (Section 6.0) and agree with the statement "...a change in a landscape (or view of a landscape) does not, of itself, necessarily constitute an adverse landscape effect..." (Landscape Report Appendix 1 Method Statement).

20. I agree with the explanation / definition of what ‘cumulative effects’ are (Section 6.4). I also add that, how, where and when cumulative effects occur needs to be carefully considered.

“Cumulative effects should be considered carefully because in one sense all effects are cumulative. Previous lawfully established activities are part of the existing environment against which the effects of a new activity are assessed. Mostly, the effects of a proposal are simply the effects on the existing environment. Likewise, a proposal’s different types of effect (for instance noise and visual effects) are simply the proposal’s combined effects rather than what is meant by cumulative effects.” (from Te Tangi a te Manu [6.47])

Limitations / information gaps

21. As mentioned above, through various correspondences with the Applicant any limitations and information gaps have now been largely resolved. Any remaining points of disagreement are discussed below, in large part limited to the landscape effects of the proposed mid-station building and its attendant earthworks and retaining wall. Geomorphology in the Doolans Basin is also addressed.

Mid-station building

22. The ridge-located mid-station building is illustrated in the ‘View Comparison’ document provided with Ms Plugger’s 26 August 2026 memorandum. The imagery is not digitally rendered to a ‘visually realistic’ level; however, the imagery is sufficient to enable an understanding of how the building and its surrounds will appear and what its effects on landscape character will be. Of note, the winter setting depicted helpfully demonstrates a ‘worst-case’ scenario as the softly textured snow cover provides a strong contrast with the building in terms of colour and texture. In summer, the buildings’ recessive colours will blend in more with the surrounding textured rock surfaces and outcrops.
23. It is understood that the mid-station building itself will be fully within Central Otago District (‘CODC’). The boundary between Queenstown Lakes District Council (‘QLDC’) and CODC is on the Rastus Burn side of the ridgeline, and some way below the ridgeline.

24. These recently provided 'View Comparison' visualisations demonstrate that the mid-station building will be located centrally on what is a broad, gently convex ridge crest, where the brow of the ridge at either side helps visually screen the building from lower elevations relative to the building from both the Rastus Burn and Doolans Basin sides (View Comparison pages 11 – 16).
25. Part of the changes associated with the mid station-building is the retaining wall, proposed to be up to 8.5 m high and 70 m long (View Comparison pages 2, 6, 8, 10 and 14) which is a substantial structure. This retaining wall combined with the proposed new ski trails: 'Return Trail to Sugar Basin' and 'Return Trail to Curvey Basin' and their required cuts and fill batters excavated into previously unmodified terrain will add cumulatively to the change introduced by the retaining wall and mid-station building where the latter element is visible.

Conservation Management Strategy Otago 2016

26. Ridgelines are important parts of the landscape, particularly in this area where they are often demarcated with jagged edges and spectacular rock outcrops. For the Remarkables-Hector area, the Conservation Management Strategy Otago 2016 ('CMS') appears to seek a balance where ridgelines and mountain tops are recognised as prominent landscape features that should generally remain natural or largely unmodified, while the Remarkables Ski Field is a recognised exception area where further sensitively designed and sited development may occur. The CMS states at Section 2.3 Outcome for the Western Lakes and Mountains / Ngā Puna Wai Karikari a Rākaihautū Place:

*"Prominent landscape and geological features (**ridgelines, and mountain tops**) remain in their natural state or are unmodified beyond their state at the time of becoming public conservation lands and waters."*

And:

"Ski fields are managed in a precautionary approach in terms of new and additional structures and terrain modification. Further development of existing ski fields may occur, in preference to any new ski fields. Disturbed areas are restored to an agreed standard comparable with that which was present prior to any development."

27. Policy 2.3.22 of the CMS is key to the project and states:

*“May allow further development and/or expansion of The Remarkables ski field (with the exception of the upper Wye Creek valley) in accordance with Policies 3.25.1- 3.25.6 in Part Three, provided that adverse effects (including cumulative effects) are **avoided, remedied or mitigated** on the following values:*

*a) the **outstanding natural landscapes** and ecological **values** of The Remarkables and the Tapuae-o-Uenuku/Hector Mountains;*

b) the landscape and ecological (including water quantity and quality) values of the priority ecosystem unit at Lake Alta;

c) the recreational experiences of other users; and

d) the ability of users to access the area year round.”

(My emphases added in **bold**).

28. The CMS therefore directs that the effects, (including cumulative effects) on certain values arising from any new development including expansion of The Remarkables ski field are avoided, remedied or mitigated. For these reasons, the proposed changes fall within the type of development contemplated by Policy 2.3.22, so long as any adverse landscape and other effects are avoided, remedied or mitigated.
29. Ms Pfluger states that the overall residual landscape effects of the project will be ‘**Moderate**’ adverse on the Rastus Burn side and ‘**High**’ adverse on the Doolans Basin side. My earlier opinion was that the effects on the Rastus Burn side will be slightly higher at ‘**Moderate-high**’ (I agree that the overall effects will be ‘High’ adverse on the Doolans side). Having now seen the ‘View Comparison’ visualisations Ms Pfluger has provided, along with further information provided by the Applicant regarding how the retaining walls are constructed (discussed below), I agree with Ms Pfluger that the overall effects on the Rastus Burn side will be ‘**Moderate**’ adverse. I note that a ‘Moderate’ adverse effect is synonymous with a ‘more than minor’ adverse effect on the RMA scale which I believe is a fair and reasonable appraisal given the current levels of modification in the Rastus Burn catchment.

30. To clarify, a residual '**Moderate**' effect implies adverse effects remain and are more than minor - mitigation has reduced impacts but has not fully addressed them. A '**Moderate-high**' effect is where material adverse effects remain despite mitigation and, a '**High**' adverse effect is a situation where serious adverse effects remain - mitigation has not prevented a substantial loss of values. A '**High**' adverse effect is considered a significant adverse effect on the equivalent RMA scale (see below, taken from TTatM).

						SIGNIFICANT	
LESS THAN MINOR		MINOR		MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH	

31. In this regard, the Applicant has acknowledged that Policy 2.3.22 of the CMS cannot be met by the project.
32. In her 21 August Memorandum, Ms Pfluger includes Policy 3.25.1 from the CMS where it states: *"May allow further development of existing authorised ski fields, where their natural values are already modified, in preference to the development of new ski fields."* This policy may provide a pathway for ski field expansion proximate to where ski field activities currently exist. However, care must be taken when considering ski field development in the Doolans Basin. While adjacent (in the context of a bird's eye view), the Doolans Basin is in a physically separate landscape from the Remarkables ski area, and its natural values are not 'already modified'. In my assessment, its natural values remain very high. As such, I consider the Doolans expansion should not be considered as 'further development of existing ski fields' which is otherwise provided for in Policy 3.25.1.

Retaining walls

33. In its 'Response to DOC QLDC and CODC re B.03 and B.04 Landscape, 27 August 2026' the Applicant has provided the following information regarding retaining walls:

"Subject to detailed engineering design and constructability assessments, NZSki's preferred approach is to utilise gabion basket retaining structures. Should alternative retaining solutions be required,

NZSki intends that any retaining structures will be designed and constructed to minimise visual effects wherever practicable. This may include facing structures with rock material sourced from earthworks undertaken within the surrounding area.”

34. As discussed above, one of the retaining walls is 8.5 m high and 70 m long. Another lower retaining wall is 3.5 m high and 180 – 190 m long. These are both very large structures, with the taller one located high in the Rastus Burn landscape, above existing ski field infrastructure and near the ridgeline. These retaining walls are substantial structures and could potentially stand out from afar as incongruous, depicting ‘bare’ horizontal ‘lines’ in an otherwise mountainous and irregular landscape where horizontal natural patterns are largely absent. Snow cover above and below bare retaining walls would exacerbate the contrast with natural patterns (**Figure 1**).



Figure 1 Zoomed-in image to the Rastus Burn catchment. Note the upper trails visible as horizontal patterns accentuated where snow does not accumulate on the steepened faces above and below trails (*image (undated) provided by DOC*).

35. For the above reasons, any large retaining walling should be as unobtrusive as possible. Gabion baskets or facing the wall/s with local rock will assist in this regard, helping the wall to blend in with surrounding natural rock in summer, and any rock texture/stepping of the walls will help retain some snow cover in winter.

36. Of note, the Applicant has also included a caveat that gabion basket walls are NZSki's "*preferred approach*" and that if this is not viable then underlying alternative walling structures "*may*" be faced with local rock, and that any retaining structures minimise visual effects "*where practicable*". Further confirmation from the Applicant would help provide a better level of certainty as to 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.

Geomorphology

37. David Barrell's statement of advice notes that: "*The Doolans Creek Right Branch Basin moraine sequence is an exceedingly well-preserved landform feature...*" that in his opinion can be regarded as an outstanding natural feature of national scientific relevance. I understand from Mr Barrell's statement of advice that the moraine sequence in the Doolans Basin is the best-preserved of its type and age in the wider region. And that it provides a unique opportunity to obtain quantitative climatic and chronological data for this part of New Zealand relating to the globally important period where Earth transitioned from a glacial to interglacial climate state.
38. Geomorphological processes are a core part of the physical landscape. As part of a landscape assessment, it is important to understand how landscapes have evolved, not just how they look now. For this reason, TtM directs assessors to analyse geomorphological and geological information, drawing on specialists' reports to understand the landscape's history and trajectory over time. The geomorphic legibility of the landscape is a key perceptual factor. While Ms Pfluger's Landscape Report graphically illustrates the geomorphology well, it does not interpret the various features as distinct geomorphic features or explain their formative processes. Nor does the AEE or other reporting by the Applicant.
39. The glacier-derived geomorphology in the Doolans Basin is characterised by its enclosed cirque-like basin landform with steep headwalls extending to the separating ridgeline contrasted with gentler more rounded moraine deposits

within the basin. The basin also includes alpine tarns of which 'Tarn 3' has formed between two moraine ridges. Scree slopes and deeply incised alpine drainage systems are also present in the basin. These features together provide a high degree of geomorphic legibility, enabling the formative glacial and ongoing erosional processes of the Remarkables mountain environment to be readily understood. The basin's geomorphological expression is a key contributor to its landscape character and its natural values.

40. The Applicant's General Arrangements Skiable Terrain plan shows earthworked and non-earthworked groomed trails and the earthworked Doolans access road traversing 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. I acknowledge that the overall form of the moraine sequence will not be fully modified by the proposed activity, but as Mr Barrell's statement of advice highlights, any physical disturbance of the moraines will at best compromise the ability to obtain key scientific data, and at worst if any boulders suitable for dating are disturbed or removed, the ability to obtain nationally relevant scientific information could result in the permanent loss of opportunities to obtain that scientific information. From an aesthetic perspective, during summer when the moraine landforms are most visible the gentle hummocky terrain will include earthworks scarring associated with the formation of trails along with the presence of a ski lift.



Figure 2 Looking north from Doolans Basin towards the ridgeline with Doolans Creek Right Branch and deeply incised gully at centre right. Gently sloping moraine bench landform in centre of image (image provided by DOC).

41. Because of the value and rarity of the moraine landforms in the Doolans Basin, in my opinion any earthworks modifications will have a **‘Very high’** adverse effect on the moraine sequence. In my opinion, avoidance is the appropriate response to physical disturbance of the moraine landforms and the processes that maintain them (natural character) including erosional and depositional processes, the flow of water, drainage patterns and sediment movement. In other words, adverse effects are not only generated by physical disturbance, but also by reducing the geomorphological legibility of the glacial sequence and how the glacial extent, processes and landscape evolution may be interpreted. Mitigation and / or remediation of effects after the fact would not be workable or appropriate. The overall adverse effects at the basin-wide scale will remain **‘High’** in my opinion - consistent with Ms Pfluger’s overall effects findings.

Carpark and bus hub

42. For completeness, I have been asked by DOC to briefly consider any landscape effects of the proposed carpark and bus hub area. This part of the project (Remarkables Ski Area Carpark & Bus Hub: Landscape Effects Assessment; 5 May 2026 (Technical Report B-04.A of the Application) and Remarkables Ski Bus Hub & Carpark Graphic Supplement; 5 May 2026 (Technical Report B-04.1 of the Application) has been peer reviewed by Ben Espie in his broader review role of the overall project on behalf of QLDC and CODC. His findings regarding the Carpark and Bus Hub aspect of the project are covered in his 3 July 2026 peer review at [34] – [44], which is appended to the Applicant's 'Response to DOC QLDC and CODC re B.03 and B.04 Landscape, 27 August 2026' (included with the 4 September 2026 updated application documents).
43. I note that Mr Espie did not challenge Ms Pfluger's effects ratings for the car park and bus hub, but he explicitly qualified his agreement by saying that the '**Low**' to '**Low-moderate**' effects ratings will depend on strong, enforceable mitigation planting requirements being added to the consent conditions. I agree with and support Mr Espie's findings and conclusions reached and have nothing further to add.

Conditions

44. In the Applicant's draft resource consent conditions (H.02 Resource Consent Conditions Updated 3 September 2026), and set out primarily in the Landscape and Visual / Built Structures, Construction, Earthworks, Ecology/Rehabilitation, and management plan sections, I note that there are no conditions requiring:
- Landscape monitoring by a landscape architect
 - Landscape compliance reporting
 - Photo-point landscape monitoring
 - Landscape performance standards
 - Review triggers where rehabilitation does not achieve specified landscape outcomes
 - Independent certification of landscape rehabilitation success
 - Ongoing monitoring of visual effects after operation commences

- Visual treatment of retaining walls.

Any landscape-related conditions proffered by the Applicant rely largely on rehabilitation, colour controls, planting, ecology/monitoring and management plans. A dedicated Landscape Management Plan or Landscape Monitoring Plan is not provided which in my opinion is critical, particularly given the magnitude of change being proposed in the Doolans Basin. In my view the above bullet points as a minimum should be adopted as conditions.

Conclusion

45. In my opinion, the key issue for the Fast-track Panel is not whether adverse landscape effects will occur, because both the Applicant's assessment and my review conclude that they will. Rather, the question is whether those effects have been appropriately identified, minimised, and can be adequately managed through mitigation, rehabilitation and enforceable conditions. Other than the high geomorphological values associated with the moraine sequencing missing from the Applicant's reporting, I am generally satisfied that the Applicant's assessment provides a reasonable basis for understanding the likely landscape effects of the proposal. However, some additional certainty is warranted regarding modification to the Doolans Basin moraine sequence, retaining wall design, rehabilitation success and ongoing landscape performance. These matters would assist in ensuring that the resulting landscape outcomes are consistent with the expectations of the CMS and the landscape values of the Remarkables and Doolans Basin environments are protected as far as practicable based on the proposed Project, should the panel be minded to approve the application.