OTAGO CONSERVATION BOARD
Poari Papa Atawhai - ā-rohe ki Otago

Otago Conservation Board Submission on the Remarkables Ski Area Upgrade and Doolans Expansion Fast-track Application (FTAA-2605-1236)

October 2026

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Otago Conservation Board		
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Postal address			
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Email (a valid email address enables us to communicate efficiently with you)	otagoconservationboard@doc.govt.nz		

2. We will email you draft conditions of consent for your comment			
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Introduction

The Otago Conservation Board appreciates the opportunity to comment on the substantive application for the Remarkables Ski Area Upgrade and Doolans Expansion project under sections 53 and 54 of the Fast-track Approvals Act 2024.

The Board's role is to advocate for the protection of conservation values on public conservation land and waters, and be a voice for our local communities. In considering this proposal, the Board has assessed the application against the outcomes, objectives and policies of the Otago Conservation Management Strategy 2016 (CMS), which provides the statutory framework for management of public conservation land within Otago.

The Board recognises the social and economic importance of the ski industry to the Queenstown Lakes district and acknowledges the applicant's stated efforts to avoid, mitigate and compensate for environmental effects. However, the Board considers that the key issue is not whether commercial recreation may occur on conservation land, but whether the scale, location and cumulative effects of this proposal remain consistent with the purposes for which the land is held and with the outcomes sought by the CMS.

Statutory and Strategic Context

The application seeks extensive authorisations across several statutory regimes and includes both expansion of existing ski infrastructure and the development of previously undeveloped areas within the Doolans Basin. The Board considers that existing concession status should not create an expectation that further expansion into undeveloped conservation land will necessarily follow.

The CMS requires recreation opportunities to be provided only where they remain consistent with the protection of indigenous natural, historic and cultural resources and with the purposes for which the land is held.

Accordingly, the central question is whether the proposed expansion demonstrates that conservation outcomes remain paramount and whether the resulting environmental and recreational effects are acceptable when considered both individually and cumulatively.

Conservation Estate, Visitor Management and Development Footprint

The Board notes that the application acknowledges that the project would transform the Doolans Basin from a backcountry environment into a frontcountry recreation setting. The Board considers this change to be significant.

The CMS explicitly recognises the importance of maintaining a range of recreation settings, from busy frontcountry destinations through to backcountry environments where visitors can experience solitude, remoteness and largely unmodified natural landscapes. The CMS further

identifies the Remarkables-Hector area as providing this spectrum of experiences, ranging from the existing ski field to more natural alpine environments.

The Board is concerned that the proposal may materially reduce the distinction between these settings and progressively shift management emphasis from conservation values toward infrastructure-led recreation development.

The Board therefore places particular emphasis on whether the proposed infrastructure footprint, rather than the skiing activity itself, is compatible with the CMS outcomes for the area.

Ecological Values

The Board notes that the project area contains habitat indigenous bird species including kea, New Zealand pipit, and kārearea, indigenous lizards including McCann's skink, and a range of alpine vegetation communities. The CMS identifies The Remarkables as an area of high ecological value, containing extensive and largely unmodified alpine and subalpine ecosystems including tussocklands, rocklands, wetlands, cushionfields and alpine tarn environments.

The Board is particularly concerned by evidence within the application describing:

- loss and fragmentation of alpine habitat associated with lifts, trails, buildings and earthworks;
- impacts on snow tussock and other indigenous vegetation communities;
- potential degradation of interconnected wetland and stream systems;
- risks to alpine fauna;
- weed establishment and spread; and
- broader cumulative effects resulting from increased human presence within the basin.

The Board considers ecological fragmentation to be a matter of particular significance because the Doolans Basin currently retains a largely natural and interconnected alpine environment. The Board remains unconvinced that proposed mitigation and compensation measures have been demonstrated to fully address these effects and considers that any approval should require robust monitoring tied to ecological outcomes rather than implementation of management actions alone.

Landscape, Natural Character and Recreation Experience

The Board notes the applicant's acknowledgement that the project will result in notable landscape and natural character change.

The CMS recognises the outstanding landscape values of The Remarkables and seeks to maintain natural alpine landscapes alongside recreational opportunities. The CMS specifically

identifies the upper alpine environments as places where visitors should continue to experience natural quiet, indigenous ecosystems and largely unmodified landscapes.

The Board therefore considers careful assessment is required of:

- gondola and lift visibility;
- ridgeline effects;
- buildings and associated infrastructure;
- visual effects on natural character;
- visitor-capacity increases;
- disturbance to wildlife; and
- effects on the ability of visitors to experience the area as a natural alpine environment.

The Board also considers that future non-ski recreational uses should not be enabled without separate assessment of their environmental and recreational effects.

Cumulative Effects and Precedent

The Board considers that cumulative effects are a central issue in this application.

The CMS repeatedly emphasises the importance of considering cumulative effects when assessing activities on public conservation land.

The proposal should therefore be assessed not only as a standalone development but in the context of existing ski field infrastructure and the broader pattern of commercial recreation expansion within the conservation estate.

The Board is concerned about the potential precedent effect of approving substantial expansion into previously undeveloped conservation land. While the footprint may represent a small proportion of the wider conservation area, the relevant question is whether approval would facilitate future incremental expansion and progressively alter the character and purpose of conservation land over time.

The Board considers that the panel should carefully evaluate where the limits to commercial recreation development on public conservation land ought to lie.

Climate Change, Water and Whole-of-Life Management

The Board acknowledges the argument that ski field operators must adapt to changing climatic conditions.

However, the Board considers that climate adaptation should not automatically justify expansion of development footprints into sensitive alpine environments—particularly where

the expansion may itself contribute to climate change through construction, increased energy and snowmaking demand, visitor transport, and the ongoing operation, maintenance and eventual replacement of infrastructure. The distinction between adapting existing facilities and expanding into previously undeveloped areas is therefore important, and the climate implications of the proposal should be treated as a central consideration rather than a secondary effect.

The Board encourages careful scrutiny of:

- snowmaking demand;
- water abstraction effects;
- use of alpine tarns for water storage;
- whole-of-life emissions;
- visitor transport effects;
- infrastructure replacement and renewal requirements; and
- end-of-life infrastructure removal obligations.

The Board is concerned that an expansion presented partly as a response to climate change could create additional long-term emissions and resource demands that compound the problem it seeks to address. The panel should therefore require a transparent assessment of the project's whole-of-life greenhouse gas emissions, including construction, energy use, snowmaking, transport, maintenance, replacement and decommissioning, together with credible measures to avoid and reduce those emissions.

Conclusion

The Board acknowledges the economic and recreational benefits identified by the applicant and notes positively the proposed transport initiatives and biodiversity mitigation commitments. However, the Board remains concerned about the scale of development proposed within an area currently characterised by significant ecological, landscape and backcountry recreation values.

In the Board's view, the key issues are the permanent expansion of infrastructure into previously undeveloped conservation land, the cumulative effects of that expansion, its whole-of-life contribution to climate change, the loss of backcountry character, the adequacy of ecological mitigation and compensation, and the precedent that approval may establish for future commercial development on the conservation estate.

Recommendations

The Board recommends that the panel carefully test the proposal against the outcomes and policies of the Otago CMS, with particular regard to protection of indigenous biodiversity, maintenance of natural character and landscape values, retention of a diversity of recreation settings, and the long-term conservation purpose of the land.

Should approval be granted, the Board considers that conditions should, at minimum:

- require removal of redundant infrastructure and full site rehabilitation at end of life;
- establish enforceable ecological monitoring programmes linked to measurable outcomes;
- require regular public reporting of ecological and landscape monitoring results;
- require measurement, reduction and regular public reporting of whole-of-life greenhouse gas emissions, supported by clear targets and corrective-action triggers;
- include triggers for corrective action where adverse effects exceed predicted levels;
- provide certainty around funding and delivery of mitigation and compensation measures;
- prevent further commercial recreation expansion without additional assessment and approval; and
- require assessment of future non-ski recreational activities before they are enabled.

Ngā mihi nui,

Otago Conservation Board/ Co-Chairs

Rachel Cooper (Chair)



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