

Before the Fast-track Panel

Under: Fast-track Approvals Act 2024

In the matter of: FTAA-2605-1236 – Remarkables Ski Area Upgrade and Doolans
Expansion

Statement of advice: Tamzin Moore

Recreation

DOC staff

12 October 2026



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Introduction

1. My full name is Tamzin Louise Moore.

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 Fast-track application. My advice will be used to inform DOC's s51 reporting and s53 comments on the application.

Qualification and Experience

3. I am a Senior Visitor Advisor with the Department of Conservation, based in the Taupō Office. I hold a Bachelor of Resource and Environmental Planning from Massey University (1994). I have more than 25 years' experience in environmental planning across a range of agencies and local authorities, together with seven years' experience as a Senior Visitor Advisor with DOC. I also spent five years as a project manager for DOC's Whakapapa three waters programme, which included consideration of the relationship between ski-field operations and associated infrastructure.
4. In my current role I have provided visitor and recreation advice in relation to ski-field activities, including recent concession applications for Whakapapa and Tūroa ski areas. For this Project, I have reviewed both draft and substantive application material, with a particular focus on recreation values, recreation effects and the Applicant's Recreation Assessment.

Code of Conduct

5. Whilst it is acknowledged 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

6. My expert advice relates to the following:

- Assessment of recreation setting, including identification of any values that have not been assessed and a comparison of the applicant's recreation assessment with my own.
- Assessment of effects and values on recreation in the back country with specific reference to any effects and mitigation proposed by the applicant.
- Assessment of the Otago Conservation Management Strategy relevant objectives and policies relevant to ski field development and the back country.
- The applicant's proposed mitigation and management assessment against the overall proposal from a recreation assessment perspective.

Material Considered

7. In preparing this advice I have reviewed the following documents as part of the substantive application:

- a. A-10 Project Description updated 3 September 2026
- b. A-13 Assessment of Environmental Effects updated 3 September 2026
- c. A-14 Management and Monitoring of Actual and Potential Effects updated 3 September 2026
- d. B-03 Landscape Effects Assessment
- e. B-07 Recreation Assessment
- f. B-25 Noise & Vibration Effects Assessment
- g. H-02 Resource Consent Conditions update 3 September 2026.

Recreational Setting

8. There are two distinct recreation settings for the existing and proposed extension of the Remarkables Skifield which also have different underlying land status. The existing Remarkables Ski Area, including the Remarkables Base Area Concession, is within the Rastus Burn Recreation Reserve. Section 17 of the Reserves Act 1977

provides that recreation reserves are held for, among other things, recreation and sporting activities and the physical welfare and enjoyment of the public, while also providing for protection of the natural environment and beauty of the countryside and emphasising open space and outdoor recreation. Although the proposed Doolans Concession extends across both the Rastus Burn Recreation Reserve and the Remarkables Conservation Area, Helicopter Ridge and Doolans Basin are within the Remarkables Conservation Area. The Otago Conservation Management Strategy 2016 (CMS) identifies the Doolans Basin as being within a Backcountry Visitor Management Zone, while the existing Remarkables Ski Area is classified as Frontcountry.

9. These differences in land status and visitor management zoning provide important context for assessing the effects of extending developed ski-area recreation from the existing Frontcountry setting into the Backcountry setting of Doolans Basin.
10. The Applicant's Recreation Assessment estimates that on fine winter days approximately 20–50 people use Doolans Basin, predominantly for ski touring and splitboarding. This was gathered as part of the stakeholder engagement by the applicant. The Applicant's Project Description identifies the existing Remarkables Ski Area as having a design capacity of up to approximately 3,500 skiers at one time on a suitable day, increasing to approximately up to 6,000 skiers under the proposal. This illustrates the different scale and character of visitor use associated with the existing backcountry and developed ski-area settings. Back country areas are defined in the CMS as:
 - Large-scale natural environments generally accessed through front country areas.
 - Places where visitors expect a relatively natural and largely unmodified environment.
 - Areas where evidence of management, infrastructure and development is limited.
 - Settings where visitors can experience solitude, remoteness and low encounter rates with other people.

- Predominantly used by backcountry comfort seekers and backcountry adventurers, self reliant and explorers. These visitors are typically self-reliant, with the skills and equipment to travel in backcountry environments with limited services, while explorer-type visitors are seeking longer, more physically demanding experiences that may require navigation skills and offer a full-day or destination-level challenge.
11. The CMS also identifies that visitors in Backcountry settings generally expect:
- Some time away from other groups.
 - Occasional or low visitor encounters.
 - Limited infrastructure.
 - Natural quiet.
 - Minimal signs, barriers and management controls.

Recreational Effects

12. I have reviewed the 2026 Recreation Assessment prepared by Rob Greenaway & Associates for the proposed expansion of the Remarkables Ski Area into Doolans Basin. In my view, there is a substantial degree of agreement between the applicant's assessment and my own assessment of the existing recreation values of Doolans Basin and the nature of the effects that would arise from the proposal.
13. In particular, the applicant's recreation assessment identifies Doolans Basin as having very high existing recreation value, primarily because of its undeveloped natural character, winter snow-sport opportunities, and unusual combination of a backcountry recreation setting with relatively easy access from the existing Remarkables Ski Area. Ski touring and split boarding are identified as the predominant winter recreation activities.
14. In my opinion, the primary recreation effect of the proposal is the substantial modification of existing backcountry recreation values, rather than the loss of physical access or the ability to undertake recreation activities.
15. Visitors would continue to be able to undertake skiing, ski touring, mountaineering, tramping, hunting and other recreation activities within the wider

area. However, the quality and character of those experiences within Doolans Basin would change substantially as a result of the introduction of gondola and other ski-area infrastructure, groomed ski trails, avalanche management infrastructure, increased visitor numbers and encounters, and greater levels of management intervention.

16. I agree with the applicant's recreation assessment that this would result in a transition from a backcountry recreation experience to a front country ski-area experience within Doolans Basin. The applicant assesses the effect on backcountry winter recreation values as very high or high. I consider that conclusion reasonable and supported by the evidence presented. The experiential values most affected include solitude, remoteness, natural quiet, an unmodified alpine setting and opportunities for self-reliant recreation.
17. An important distinction in the applicant's assessment is between recreation opportunity, being the physical ability to continue undertaking an activity, and recreation value, being the quality and characteristics of the experience. I agree with that distinction. Maintaining physical access does not, by itself, maintain the recreational experience where the character of the setting has fundamentally changed.
18. I also agree with the applicant's conclusion that there are limited opportunities to mitigate the change in recreation setting. While users may continue to access the broader Remarkables and Hector Mountains, the specific combination of accessibility and backcountry characteristics currently provided by Doolans Basin would be substantially altered.

Comparison of Recreation Effects

19. The following table summarises the key areas of agreement and difference between my recreation assessment and the Applicant's recreation assessment. The reasons for my assessment are discussed in the preceding paragraphs.

Recreation Value	My Assessment	Applicant's Assessment	Key Difference
Backcountry ski touring / split boarding	Very High existing; Very High–High residual	Very High existing; Very High–High residual	Agree with Applicant's Very-high - High residual assessment after mitigation.
Natural quiet	Adverse effect on existing backcountry value	Recognises an adverse effect on natural quiet but does not separately rate it as a residual recreation effect	No substantive disagreement that natural quiet would be affected. DOC identifies it as an important component of the existing backcountry experience.
Solitude and remoteness	Adverse effect on existing backcountry value	Recognises the loss or reduction of these qualities and the limited ability to mitigate the change in recreation setting	No substantive disagreement. DOC identifies solitude and a sense of remoteness as important components of the existing backcountry experience.
Physical ski touring opportunity	Moderate residual	Moderate residual	Agree with the applicant's assessment. Physical opportunity remains, although the creation setting changes.
Mountaineering /ice climbing	Minor	Minor	Agree with the applicant's

			assessment. Main climbing activity occurs outside the ski development area.
Hunting /summer recreation	Minor	Minor	Agree with the applicant's assessment.

20. Based on the Recreation Assessment and stakeholder evidence, I consider the Doolans Basin to be an important regional location for backcountry ski touring because of the combination of accessibility, terrain diversity, proximity to Queenstown and the relative scarcity of comparable accessible backcountry settings.
21. The Applicant's Recreation Assessment considers cumulative effects and records that there are no known additional consent applications in the area or region of the same type or with the same suite of recreation effects that would give rise to a cumulative effect. The assessment does not consider cumulative effects associated with the wider range of tourism developments occurring within the region. The Applicant's assessment identifies backcountry winter sports as having Very High regional value, reflecting that Doolans Basin is one of a limited number of such settings with relatively easy access. I have not undertaken a separate regional cumulative effects assessment and therefore do not express a conclusion on the magnitude of any broader cumulative recreation effect. I do, however, consider the limited availability of comparable accessible backcountry ski-touring settings to be relevant when considering the significance of the recreation effects on Doolans Basin.

Otago Conservation Management Strategy Provisions

22. The Otago Conservation Management Strategy (CMS) provides the primary statutory and strategic framework for assessing recreation effects associated with the proposed Remarkables Ski Area Upgrade and Doolans Expansion. The CMS contains both provisions that contemplate further development of the existing

Remarkables Ski Area and provisions that seek to maintain a range of recreation opportunities, including opportunities for solitude, natural quiet and backcountry recreation experiences.

23. The purpose of the table below is to assess the proposal against the recreation-related outcomes and policies of the CMS and identify areas of consistency and potential tension. The table focuses on those provisions most relevant to recreation values and visitor experience, including recreation diversity, backcountry character, natural quiet, public access and the management objectives associated with the Backcountry Visitor Management Zone.
24. The assessment recognises that the proposal would provide benefits through increased skiing capacity, additional terrain and improved access to alpine recreation. However, it also considers the extent to which the proposal may affect the existing backcountry recreation values presently associated with the Doolans Basin.

CMS Outcome / Policy	Assessment
Remarkables-Hector Area: "A range of recreational experiences is available ranging from largely unmodified environments where a sense of solitude and remoteness can be found, to The Remarkables busy ski field."	The proposal increases alpine recreation and skiing opportunities but reduces the availability of accessible backcountry recreation experiences within Doolans Basin. This reduces the availability and diversity of accessible back country recreation experiences within the area.
Policy 2.3.21(d) and 2.3.21(e) - Particular regard to adverse effects on natural quiet and current recreational uses.	The proposal has adverse effects on natural quiet and existing backcountry recreation values are anticipated due to increased infrastructure, operational activity and visitor numbers.
Policy 2.3.22 - May allow further development and/or expansion of The Remarkables Ski Field provided adverse	The proposal falls within the type of ski field expansion contemplated by Policy 2.3.22. In considering such expansion, the policy requires adverse effects on the recreational

effects on recreational experiences of other users are avoided, remedied or mitigated.	experiences of other users to be avoided, remedied, or mitigated. The Applicant's recreation assessment identifies residual effects on existing backcountry recreation values. The proposed mitigation and the extent to which it addresses those effects are therefore relevant considerations under Policy 2.3.22.
Policy 3.1.5 - Manage recreation opportunities in accordance with Visitor Management Zones.	The proposal creates tension with the current Backcountry Visitor Management Zone by introducing characteristics more typically associated with a Front country recreation setting.
Backcountry Visitor Management Zone (CMS Appendix 12): Visitors generally expect limited infrastructure, natural quiet, low visitor encounters, some solitude and largely unmodified settings.	The proposal represents a material change from the recreation setting anticipated by the existing zoning. Appendix 12 describes backcountry as a large-scale natural setting with relatively limited facilities and an expectation of some separation from other users and opportunities for solitude.
Policy 2.3.22(d) - Maintain the ability of users to access the area year round.	Generally consistent. Public access is proposed to be maintained, subject to operational and safety requirements.

25. Overall CMS conclusion: The Otago CMS expressly contemplates the possibility of further development and/or expansion of The Remarkables ski field outside the upper Wye Creek valley. That provision is not, however, an unqualified direction in favour of expansion. Policy 2.3.22 requires adverse effects, including those on the recreational experiences of other users, to be avoided, remedied, or mitigated. The CMS also seeks to retain a range of recreation experiences across the Remarkables-Hector area, from largely unmodified environments providing solitude and remoteness through to the busy Remarkables ski field. The proposal

would significantly alter the existing backcountry recreation character of Doolans Basin. While physical recreation access and many recreation activities would remain, the backcountry character and experiential values associated with the existing setting would be substantially altered. The effectiveness of the proposed mitigation in addressing that residual effect is therefore a key consideration when assessing the proposal against Policy 2.3.22.

Mitigation and Management Measures

26. The Applicant proposes a range of mitigation measures including:
- Maintenance of public access where safe.
 - Continuation of "one-up" lift passes for backcountry users.
 - Establishment of a Recreation Users Group.
 - Ongoing engagement with recreation interests.
 - Rehabilitation measures associated with eventual closure of infrastructure.
27. These measures are generally appropriate and will assist in managing recreation access and visitor relationships.
28. However, I agree with the recreation assessment that these measures do not fully address the principal adverse recreation effect, which relates to the change in the existing backcountry recreation setting and experience within Doolans Basin.
29. The proposed measures are therefore more effective in maintaining access and managing interactions with recreation users than in mitigating the change in the character of the recreation setting itself.

Overall assessment

30. I consider the Applicant's recreation assessment to be generally robust and to provide an adequate assessment of existing recreation use, values and effects. I agree with its conclusion that recreation activities and physical access would largely remain available, but the backcountry character and experience of Doolans Basin would change as a result of the proposal. The principal adverse recreation effect therefore relates to the change in the recreation setting and

experience, rather than the loss of access or the ability to undertake recreation activities.

31. The proposal would provide recreation and visitor benefits through increased skiing capacity and terrain, improved opportunities for beginner and intermediate skiers, and greater access to alpine recreation for visitors who may not otherwise access these environments.
32. These benefits need to be considered alongside the effects on the existing backcountry recreation values of Doolans Basin. I agree with the Applicant's assessment that the proposal would result in a change from the existing accessible backcountry setting towards a more developed, frontcountry ski area environment. The introduction of infrastructure, increased visitor use and ski area operations would change the opportunities currently available to experience natural quiet, a sense of solitude and remoteness, and a relatively undeveloped alpine setting.
33. While alternative ski-touring opportunities exist elsewhere in the region, Doolans Basin provides a distinctive combination of backcountry recreation character and relatively convenient access. I acknowledge that this accessibility is facilitated in part by the existing road, car parking and ski-field infrastructure at The Remarkables. This enables users to move relatively easily from a developed ski-area setting into an adjoining backcountry environment. The proposal would retain access to alpine recreation, but would change the character of the recreation experience available within Doolans Basin.
34. The Otago CMS contemplates the possibility of further development and/or expansion of The Remarkables Ski Field. Policy 2.3.22 also requires consideration of adverse effects on the recreational experiences of other users, including how those effects are avoided, remedied, or mitigated. The CMS also seeks a range of recreation experiences across the Remarkables-Hector area, including opportunities to experience solitude and remoteness alongside the developed recreation experience provided by The Remarkables Ski Field.
35. I agree with the Applicant's assessment that, despite the proposed mitigation and continued recreation access, residual effects on backcountry winter recreation

values remain. The proposed mitigation would assist in maintaining physical access and the ability to continue activities such as ski touring and mountaineering. However, maintaining access does not fully mitigate the effect on the recreation setting itself. Users may continue to ski tour through Doolans Basin, but would do so within a more developed and managed environment, with ski-field infrastructure, increased visitor activity and greater visitor encounters. The recreation opportunity therefore remains, but some of the qualities that currently distinguish the backcountry experience, including natural quiet, limited development and opportunities for a sense of solitude and remoteness, would be reduced.

36. Overall, the proposal would increase developed skiing and alpine recreation opportunities while changing the accessible backcountry recreation experience currently provided by Doolans Basin. In my opinion, both the recreation and visitor benefits of the proposal and the effects on existing backcountry recreation values are relevant and important considerations for the Panel when assessing the proposal against the recreation outcomes and policies of the Otago Conservation Management Strategy.