Central Otago District Council Comments

FAST-TRACK APPLICATION – NZSki Limited

Project Name	Remarkables Ski Area Upgrade and Doolans Expansion
Applicant	NZSki Limited
Project Number	FTAA-2605-1236
Consents sought	RMA consents sought under the Central Otago District Plan
Date due to EPA	27 October 2026

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Executive Summary

This report evaluates the Remarkables Ski Area Upgrade and Doolans Expansion proposal by NZSki Limited (**NZSki**) under the Fast-track Approvals Act 2024 for the expansion of the existing Remarkables Ski Area into the Doolans Basin. The proposal spans both the Queenstown Lakes and Central Otago districts. The Central Otago District Council (**CODC**) has reviewed the substantive application, supporting technical reports, and subsequent information provided by the applicant, and engaged independent technical experts to peer review key aspects of the proposal. These comments are intended to assist the Fast-track Panel in its assessment of the application.

CODC acknowledges that the proposal has the potential to deliver significant economic and recreational benefits, including increased ski field capacity, enhanced tourism opportunities, additional seasonal employment, and wider benefits to the Otago economy. The independent economic specialist for CODC considers that, while some assumptions may overstate the scale of economic benefits, the project is nevertheless likely to be regionally significant from an economic perspective. The most direct benefits, however, are expected to accrue within the Queenstown Lakes District, with more modest benefits extending into Central Otago. Refer **Appendix B**.

The Doolans area is identified as a Significant Natural Area and the proposal will result numerous residual effects on terrestrial ecology that are of a high level of effect. CODC's independent ecological specialist has identified that significant concerns remain regarding the assessment of vegetation loss, impacts on significant alpine habitats, and the adequacy of the proposed biodiversity compensation project. They consider that several ecological effects have been understated and that the proposed compensation measures do not currently align with the principles and expectations of the National Policy Statement for Indigenous Biodiversity as it does not propose to achieve a no-net-loss outcome for indigenous biodiversity. These matters remain unresolved. Refer **Appendix C**.

Doolans Basin is identified as an Outstanding Natural Landscape in the Central Otago District plan. Both the applicant's and CODC's landscape experts agree that the Doolans Basin currently exhibits very high natural character values. Adverse effects on natural character and landscape values have been identified as significant. The experts consider that the introduction of ski infrastructure, buildings, trails, roads, water storage facilities, and associated activity into a previously undeveloped alpine basin will result in high adverse effects on landscape values, moderate-high to very high natural character effects, and moderate to high adverse visual effects. (High and very high effects equate to significant effects). While mitigation measures will reduce some impacts, the experts agree that significant adverse effects will remain over the long term. Refer **Appendix D**.

In relation to historic heritage, CODC's Heritage expert supports the conclusion that the surveyed areas are unlikely to contain significant archaeological or heritage resources. They however note that key components of the project area, including the Doolans water intake and access route and sections of Doolans Creek, have not been surveyed. Additional field investigations are therefore recommended before construction proceeds to confirm whether

heritage values are present. Refer **Appendix E**.

CODC's technical expert for noise and vibration, natural hazards, three-water servicing, and construction management generally conclude that the proposal can comply with relevant regulatory requirements and that potential adverse effects can be appropriately managed through detailed design, construction methodologies, and consent conditions. The technical experts have nevertheless recommended a number of amendments to strengthen conditions relating to stormwater management, erosion and sediment control, natural hazard management, infrastructure design, and construction oversight. Refer **Appendices F, G and H.**

In terms of recreational effects, the proposal will provide positive regional benefits by increasing commercial ski terrain and access opportunities. The technical experts however agree that there will be very high temporary adverse effects on recreational users during the construction period and high to very high adverse effects on existing backcountry skiing and winter recreation experiences within the Doolans Basin once operational. CODC supports the establishment of a Recreation User Group to assist in managing these effects and facilitating future recreational opportunities.

From a planning perspective, CODC's review concludes that while many environmental effects can be managed through conditions of consent, the proposal, which is a non-complying activity, will result in adverse effects, some of which are significant, on landscape values, natural character, indigenous biodiversity and recreational values. As a result, the proposal is not considered to be consistent with key provisions of the Central Otago District Plan (CODP) and the National Policy Statement for Indigenous Biodiversity (NPS-IB), particularly the requirement to maintain indigenous biodiversity and protect landscape values. Refer **Appendix I**.

In summary, key matters for CODC are:

- The effects on terrestrial ecology and biodiversity values and ecological compensation for the loss of ecological biodiversity that is anticipated by the project;
- Effects of historic heritage values;
- The effects on the natural character and outstanding natural landscape values of the Doolans Basin;
- Ensuring the conditions achieve the stated environmental outcomes; and
- The Proposal's ability to achieve the outcomes of some key objectives and policies of the CODP and the NPS-IB.

1. Introduction

The Central Otago District Council (**CODC**) welcomes the opportunity to provide comments under s53 of the Fast-track Approvals Act 2024 in relation to the proposal by NZSki Limited (**NZSki**) to expand the Remarkables Ski Area into the Doolan's Basin (**Proposal** or **Project**). The proposal is located within both Queenstown Lakes District and the Central Otago District. The CODC's comments relate only to the proposed works and activities within the Central Otago District, unless some discussion is required or context.

Council has reviewed the substantive application and the documents lodged with the substantive application on 19 May 2026 and the further information provided by the applicant on 3 September 2026. Council's experts are available to attend workshops or conferencing to further narrow unresolved issues.

The comments in this report seek to assist the Panel by highlighting matters that should be considered, differences of opinion between the applicants' and CODC's technical experts and providing comments on the nature and scale of adverse effects where possible. Preliminary comments are also provided on the conditions, however, it is anticipated that a conditions workshop will be held to allow further refinement of any proposed conditions.

2. Central Otago District Context

The Central Otago District is a vast, fast-growing district with a population of 24,306 based on the 2023 census. This equates to a 12.7% increase since the 2018 census. A place of unique natural environments, outstanding landscapes and people, Central Otago offers exceptional outdoor recreation, family-friendly amenities, and a balanced lifestyle.

Central Otago consistently exceeds national statistics across the board in economic growth, employment growth, population growth and self-employment, while at the same time maintaining high living standards and low unemployment (1.4% in 2024). Economic growth and employment growth in Central Otago District are consistently higher than the national average over the ten years to 2024, and unemployment is significantly lower than the national average in the year to March 2024 (1.4% vs 4% nationally). Construction and agriculture generate 35% of employment and Tourism accounts for 10% of employment with $285.9 million in visitor spending in 2024.[1]

The Central Otago economy is driven by strong industry groups and a diversified economy, in construction, agriculture, horticulture, and viticulture, producing premium goods like merino wool, stone fruit, and Pinot Noir. Growing adoption of agri-tech and renewable energy are further positioning Central Otago as a hub for sustainable innovation and economic resilience.[2]

[1] Source: Central Otago District Council Economic Development Strategy 2025-2035
[2] Source: Central Otago District Council Economic Development Strategy 2025-2035

In 2023, the “Shaping Tomorrow Together” project was launched, which aimed to create a 50-year vision for the Central Otago district.3 The project included structured conversations with key stakeholders, focus groups with Central Otago residents in each of the four wards across the District, a separate focus group for youth and another for residents from diverse cultural backgrounds. The Shaping Tomorrow Together project captured the aspirations of the people of Central Otago for the next fifty years.

The key findings in terms of aspirations were:

- Protecting the health of the natural environment, for peaceful enjoyment, active recreation and as a fundamental prerequisite to high-quality productive enterprise.
- Building resilience - improving the sustainability of the economy, environment and society.
- Embracing the Future while honouring Central Otago’s strong roots.
- Managing growth and development in ways that are true to the community voice and values: e.g. protecting a small-town feel, providing wide-open natural spaces and enabling the pace and space that gives 'breathing room’ for people.
- Improving affordability - mostly (but not wholly) as it relates to housing.
- Strengthening the sense of belonging by developing welcoming, connected and supportive communities.
- Investing in world-class facilities and services (healthcare, education, infrastructure of all types be this roads and bridges, digital infrastructure, transport options).
- Recognising the importance of the freedoms that personal safety and security bring to enjoying the way of life Central Otago.
- It also suggests a subtle but significant shift in peoples’ mindsets. While continuing to show respect for traditional values, there is also an emphasis on the need for progressive thinking and becoming more future focused if the preferred way of life in Central Otago is to be sustained.

While the proposal will extend an existing ski field and provide increased recreational opportunity for commercial skiers, it will impact on the natural environment in the Doolans Basin, which is identified as an Outstanding Natural Landscape and has significant ecological values. It is important that any development in this part of the District is undertaken in a way that respects the natural environment, as the natural environment is valued as fundamental to well-being and the way of life in Central Otago.

[3] Source: www.codc.govt.nz/services/community-development/1central-otago-our-place-in-the-world

3. Technical Reviews and Recommendations

CODC engaged technical experts to undertake a review of the various technical reports that form part of NZSki's substantive application and provide advice in relation to information gaps, difference of opinion in relating to the effects assessments and methods for mitigation effects, and the draft conditions of consent. In most cases (i.e. where reports were made available) the experts provided initial feedback to draft reports prior to lodgment, and updated comments to the lodged version of the application. The comments that form part of these s53 comments reflect this process.

The technical experts engaged to provide input in the NZSki application are:

- Economics, Ms Natalie Hampson, Savvy Consulting Ltd
- Ecology, Dr Luke Liddell, Cameron Thorp, Samantha Kin, Wildlands
- Landscape values and visual effects, Mr Ben Espie, Vivian+Espie
- Heritage, Dr Chris Jennings, Origin Heritage
- Noise and vibration, Mr Jon Styles, Styles Group
- Effects on recreational values – Mr Gordon Bailey, Parks and Recreation Manager at CODC
- Natural Hazards – Mr Mark Cruden, Meyer Cruden Engineering Ltd
- Three water services – Mr Anthony Steel, Fluent Solutions and Mr Walt Denley, CODC Land Development Engineering Manager
- Construction management – Mr Walt Denley, CODC Land Development Engineering Manager
- Planning – Louise Taylor, Taylor Planning Ltd

The same technical expert has been engaged by the Queenstown Lakes District Council to provide continuity in the review process in relation to two topics. Experts also engaged by QLDC include:

- Natural Hazards – Mr Mark Cruden
- Landscape and Visual Effects – Mr Ben Espie

As noted above, the CODC's comments are limited to the actual and potential effects of the proposed activity within the Central Otago District boundary.

Comments on the proposed conditions are attached to this report as **Appendix A**.

A summary of each technical expert's comments is provided below along with recommendations for resolving potential issues, including through the drafting of suitable proposed conditions. This summary should be read alongside the full reports/memos from each of the technical experts, which are attached in **Appendices B-H**.

3.1. Economic Effects

Summary of Conclusions/Areas of Disagreement

Natalie Hampson of Savvy Consulting undertook a peer review of the Economic Assessment (EA) undertaken by Benje Patterson, dated June 2026, (Updated Substantive Application 3 September 2026, Part B-01). Ms Hampson's report is attached as **Appendix B**.

Information Gaps

Ms Hampson's review of the EA concludes that the project is likely to be of significance to the Otago Region economy. However, she has identified that there is more information that would be useful to fully contextualize some of Mr Patterson's assumptions, and that the impacts modelled in the EA represent an upper limit of benefit and may therefore overstate economic benefits. The information gaps identified by Ms Hampson that may result in the benefits being overstated include:

Construction Costs

The EA has not been able to provide a more detailed analysis of construction impacts, and states that the reported impacts are indicative only given the absence of more detailed costings for the Project. Ms Hampson states that Fast Track applications typically provide more detailed costings than a single figure. She considers this lack of detail is an area of concern as it is unclear if imported goods (which could be significant in value) have been excluded from the total cost. Further, the EA Report assigns the total cost of the Project to a single sector (civil and heavy engineering construction) and allocates all spending to businesses located in Queenstown Lakes District. She considers it likely that the construction of the Project will engage with a broader range of sectors, and businesses that may be located outside of Queenstown Lakes District (**QLD**). Further details on this aspect of the EA Report are directly relevant to understanding the scale and extent of economic benefits.

Other information that Ms Hampson considers would be useful in validating the counterfactual scenario includes:

- Information about skier days by customers origin in the 2025 season - without understanding when those days occurred, it is hard to fully understand why the ski field cannot accommodate any growth in skier days in the coming seasons as inferred by the EA Report 's counterfactual scenario (i.e. on other days that are not at capacity).
- More information about when locals and visitors come to ski at the Remarkables would assist to illustrate the ability (or otherwise) of NZSki to encourage or facilitate demand more evenly across the season.
- Additional detail on whether NZSki's ski fields were operating at peak operation in the 2025 season to justify the assumption that all other ski fields would be unlikely to capture any growth in skier days over the next decade.

Limitations
Ms Hampson has identified the following limitations of the EA:

Robustness of national demand projection:
It is notable that a much faster growth rate is assumed for the next decade than occurred in the last decade, and no explanation for this is provided in the EA. The assumption of holding the same participation rate of skiing in the total population constant over the next decade appears a key assumption for the contextual discussion of the growth projection. Given the significant costs of skiing, increasing costs of living, and changing ethnic structure of the resident population (particularly in Auckland), it is conceivable that the number of skiers per capita is decreasing rather than holding constant. This may also be the case for the QLD population as it diversifies.

Industry-wide capacity constraints
There is insufficient data to confirm that the Remarkables (and other) ski field(s) have no potential to grow skier days beyond the 2025 season under the counterfactual. This is relevant to the baseline against which 2035 skier activity is compared against.

Attribution of ski-visitor spending to The Remarkables Ski Field
In Ms Hampson's experience, attribution of tourism spend to a particular activity would first establish what role that activity had in the reason for travel. Only spending by visitors for which that activity was the main purpose of travel would normally get counted. In the absence of further data, Ms Hampson considers that the spending estimates quantified in the EA should be considered an upper limit of what spending should be attributed to the Remarkables Ski Field in 2025 (and as a result of the Project by 2035).

Whether Central Otago skiers are visitors or 'locals'
The EA Report treats all skiers at the Remarkables Ski Field that came from the 'rest of Otago Region' as visitors staying in QLD and therefore applies the daily (but effectively overnight) domestic visitor spend to those ski days. Ms Hampson considers that residents of Central Otago District (particularly those from the Cromwell Ward) would not be likely to stay overnight when skiing at Remarkables Ski Field and should be treated as 'locals' along with QLD residents. She considers that this would likely result in a minor reduction in total visitor expenditure.

Reality of attracting national demand growth when accounting for origin of demand
Ms Hampson considers that the growth rates implied in the EA Report at the Remarkables (assuming the national projection presented is a realistic ceiling of demand) may be optimistic in terms of willingness to travel/pay. While the same quantum of additional skier day growth may be achievable at Remarkables, it may occur over a longer period than 2030-2035. The implication of slower growth is that the 2035 figures may be overstated (or conversely, the same quantum of spend needs to be discounted over a longer period). The Low Scenario for 2035 may be more appropriate in this context.

The role of imports in total construction cost
Unless the indicative $193 million cost to construct the Proposal explicitly excludes imported components (particularly for the gondola), Ms Hampson considers that there is a risk that spend that accrues to New Zealand and Otago Region/Queenstown Lakes District is overstated.

Economic disbenefits
The EA Report does not identify any economic costs or disbenefits arising from the Project. In Ms Hampson's view there are economic disbenefits (and costs) associated with tourism growth in QLD that are well documented. This includes the burden that tourism growth puts on road congestion, road accidents and wear and tear, three waters infrastructure, other community infrastructure including public toilets, parking and emergency medical services and the costs associated with managing freedom camping (for example). The EA Report says that the growth in skier days facilitated by the Project is not a transfer of demand and would not occur in QLD if not for the expansion. On that basis, any disbenefits arising from additional ski tourists coming to QLD because of the proposed expansion are partly, but indirectly, attributable to the Project.

Ms Hampson concludes that managing indirect tourism externalities is unlikely to be something that the Project itself should mitigate as it is considered to be a wider policy issue for government to address.

Conclusions
While there is more information that would be useful to fully contextualize Mr Patterson's assumptions, Ms Hampson considers that the impacts modelled in the EA Report represent an upper limit and may overstate economic benefits for several reasons. However, when all taken into consideration, she considers that the Project is still likely to be of **significance in the Otago Region economy**. Ms Hampson considers that the extent of those economic benefits is largely limited to Queenstown Lakes District, with spill - over benefits to the rest of Otago Region only minor.

Ms Hampson's conclusions on the significance of the project are not solely on the basis of the economic impacts discussed in the EA Report, but from taking a broader perspective of some potential economic opportunities that the Project may unlock, which she has identified as:

- Ski fields are limited in number and spatially constrained across New Zealand. The Remarkables Ski Field has an important role in the New Zealand ski industry.

- The scale of the proposed expansion in terms of the increase in the maximum operational skier days (3,500 to 6,000) is significant (supporting economies of scale).

- Ski fields are among the largest businesses operating in the district economy. The investment by NZSki may stimulate or improve the commercial viability or

confidence of other investment in QLD, and potentially neighbouring Central Otago District.

- Expanding ski field capacity/ski-able terrain in New Zealand helps mitigate leakage of domestic ski days to overseas resorts while also improving New Zealand's reputation as a ski destination for overseas markets.

- Larger ski fields provide more feasible opportunities to attract international ski events to New Zealand with associated economic flow-on effects.

- The Remarkables Ski Field is already a large seasonal employer and the expansion would be expected to support a material number of net additional seasonal jobs.

- The construction of the project will generate economic activity in Queenstown Lakes District and wider Otago (particularly if gondola components are imported via Port Chalmers for example) and will help sustain (or potentially grow) jobs in a range of construction and other related specialist fields. This will likely grow the region's capabilities and capacity for gondola construction which could benefit related 'gondola' projects proposed in the district in the medium term if approved.

- The operational benefits of the Project will start to be felt in a relatively short time period (i.e. starting in the 2030 season).

Overall, Ms Hampson states that while she considers that some caution is warranted in adopting the full extent of gross economic impacts reported in the EA Report, she agrees with Mr Patterson that the Project is likely to meet the purpose of the Fast Track Act in so far as economic benefits are concerned.

Recommendations

No recommendations are made.

3.2. Ecological Effects

Summary of Conclusions/Areas of Disagreement

Wildlands ecologists undertook a peer review of the:

- updated Terrestrial Ecology Impact Assessment (**TEcIA)**, Part B.12, dated 26 August 2026),
- the updated Lizard Assessment and Management Plan (Part B.13, dated 27 August 2026),
- the updated Resource Consent Conditions (dated 3 September 2026), NZSki's Effects Management and Compensation Overview Addendum (Part A.21); and
- the Terrestrial Ecology Management Plan (**TEMP**) (Part F.03) dated 21 May 2026 that are part of the substantive application.

Four ecologists from Wildlands participated in the review, within their specific areas of expertise. The review was led by Dr Luke Liddell.

For clarity, the review undertaken by Wildlands did not include the freshwater ecology, Rastus Burn, and base car park effects, as these matters are not within the CODC's jurisdiction for consenting. The Wildlands peer review report is attached as **Appendix C**.

General

For context, the entire study area within the CODC boundary is mapped as an area of **Significant Natural Value** in the District Plan. The area is listed in Schedules 19.6.1 and 19.6A, being identified as an 'Area of Significant Natural Value' in the Central Otago District Plan. All of the vegetation communities contain ecological values that are **significant** under assessment criteria set out in National, Regional and Territorial Policy documents and District Plans.[4]

Wildlands note that the TEMP and Conditions include many large tables and figures, which cover connected and sometimes overlapping aspects of effects management, monitouring, and reporting requirements. They have identified many inconsistencies between different tables and figures making it challenging to accurately track specific management actions and conditions for workability and effectiveness.

Terrestrial EIA

General

The Wildlands review provides details about the matters that have been resolved and /or agreed with the Applicants' ecologists, as a result of the responses to comments on the reports and workshopping. The summary provided below focuses on the areas of disagreement and recommendations for changes to the conditions to ensure effectiveness, enforceability and accuracy. Wildlands consider that because there are numerous lower-level effects are not managed to at least a no-net-loss level means that there is a heightened risk of multiple stressor effects, where many minor impacts interact to cumulatively harm ecological values on-site, particularly in conjunction with future

[4] Terrestrial Ecology Impact Assessment, e3S, dated 26 August 2026.

climate change impacts[5].

Unmanaged Effects

Wildlands state that the updated TEcIA continues to leave "minor" or lower residual effects unaddressed, meaning the appraisal cannot achieve a No Net Loss or Net Gain outcome for terrestrial ecology values. Wildlands state that this does not align with the national directives in the National Policy Statement for Indigenous Biodiversity (NPS-IB) to achieve no net loss.[6]

Wildlands note that the TEcIA also does not consider the potential effects from snow making activities adding nutrients to the alpine environment. Wildlands consider that this effect could occur because snow making water is taken from Doolans Creek at the base of the valley, and it is likely to have significantly higher nutrient levels than snow that falls naturally. This impact is likely to be most pronounced where the nutrient-rich water accumulates, e.g. in the cushion bogs which are naturally adapted to very low nutrient levels and could be impacted by changes in groundwater nutrient levels. Deeper, more compact snow (and extended snow cover as a result) are also potential impacts as a result of snow grooming, and this could also impact the vegetation and hydrology of the Doolans.[7]

Pumpstation/Water Supply

Wildlands accept the rationale for taking water for the project from Doolans Creek rather than the Ratus Burn. However, they note that the need to take water from Doolans Creek substantially increases the ecological impact of this project, and it significantly increases the length of permanent roading and underground piping and may also contribute to the need for the reservoir construction in Tarn 3. No other single design choice within this application has such a large ecological impact across a wide variety of values.[8]

Vegetation Surveys

Wildlands consider that the vegetation surveys are likely to have accurately estimated or possibly slightly overestimated each vegetation community, with the exception of High Alpine Cushionfield and Dracophyllum Scrub. Wildlands consider the survey outcome, which relied on a single datapoint for High Alpine Cushionfield and Dracophyllum scrub, is inconclusive.[9]

[5] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, section 4.2 first paragraph

[6] National Policy Statement for Indigenous Biodiversity Objective 1

[7] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 4.2

[8] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 4.3

[9] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 4.4

Extrapolated Vegetation Mapping and Magnitude of Loss

While the Terrestrial Ecology Response[10] (by e3S, dated 11 August 2026) acknowledges the concerns raised by Wildlands regarding the machine learning (ML) model used to infer alpine vegetation in the Remarkables Ecological District (ED), Wildlands remain concerned that extrapolating vegetation communities outside the surveyed area will not necessarily contain equivalent ecological values to the vegetation communities in the upper Doolans.[11]

Wildlands also remain concerned that assessing the magnitude of vegetation loss at the ED scale leads the updated TEcIA to calculate magnitudes of effect for vegetation loss that are too low. Wildlands consider it essential for the TEcIA to show what percentage of actually surveyed and manually mapped vegetation within the Doolans and Rastus Burn will be cleared, in order to better inform the magnitude of effect assessment. A high % loss of a vegetation community within this area should be assigned an appropriate magnitude irrespective of how extensive these communities are predicted to be in the wider ED.

Invertebrates

Wildlands consider that additional sampling outside of the mid-January–early March time window would still be valuable and make the results of the invertebrate sampling more robust. In particular, sampling between October and December would be valuable, as it would capture emerging moths that could be missed later in summer/autumn.

Residual Level of Effect

Table 1 (page 10) of Wildlands Peer Review provides comment on terrestrial ecology levels of effect attributed by e3S and identifies areas of agreement and disagreement with the levels of adverse effect attributed to terrestrial ecology. As can be seen in the table, there are several adverse effects on terrestrial ecology values that are a **high** level of effect, after mitigation.

[10] e3s 24135 – Remarkables Upgrade and Doolans Expansion Lizard Management Plan CODC Response, 11 August 2026

[11] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 4.5.1

Effect	Level of Effect - Initial	Level of Effect - Residual	Wildlands Comment
Vegetation loss - North facing tussock grassland, Dracophyllum scrub.	Low	Low	Disagree, see discussion in Section 4.5 for an explanation of issues with the applicant's assessment of the magnitude of vegetation loss.
Vegetation loss - High alpine cushionfield.	High	Moderate	Disagree, see discussion in Section 4.5 for an explanation of issues with the applicant's assessment of the magnitude of vegetation loss. Additionally, it is not clear why effects management lowers the residual level of effect from vegetation loss this vegetation community but not for any other community.
Vegetation loss - All other vegetation communities present in the Doolans.	Moderate	Moderate	Disagree, see discussion in Section 4.5 for an explanation of issues with the applicant's assessment of the magnitude of vegetation loss.
Fragmentation/infrastructure impediment - Eastern falcon.	Moderate	Low	Agree
Fragmentation/infrastructure impediment - Ground dwelling invertebrates.	Low	Low	Agree
Fragmentation/infrastructure impediment - All other avifauna and terrestrial invertebrates.	Negligible	Negligible	Agree
Fragmentation/infrastructure impediment - North facing tussock grassland, *Dracophyllum* scrub, cushionfield, high alpine cushionfield, rockfield, and rocky outcrop).	High	High	Agree
Fragmentation/infrastructure impediment - Cushion bog, riparian wetland, and seepage).	Very High	Moderate	Agree
Weed introduction/mobilisation.	Very High	Low	Agree
Sedimentation - cushion bog, riparian wetland, seepage, and snowbank).	Very High	Moderate	Agree
Sedimentation - All other vegetation communities present in the Doolans.	High	Low	Agree
Habitat loss - Eastern falcon (nesting, low quality foraging).	Low	Low	Agree
Habitat loss - Eastern falcon (high quality foraging).	Moderate	Moderate	Agree
Habitat loss - NZ Pipit (nesting above 1700m).	Very Low	Very Low	Agree
Habitat loss - NZ Pipit (nesting below 1700m).	High	Low	Agree
Habitat loss - NZ Pipit (nesting below 1700m, foraging).	High	High	Agree
Habitat loss - Kea (nesting, foraging).	Low	Low	Agree
Habitat loss - Australasian harrier (nesting, foraging).	Very Low	Very Low	Agree

Effect	Level of Effect - Initial	Level of Effect - Residual	Wildlands Comment
Habitat loss - Southern black-backed gull (nesting, foraging).	Very Low	Very Low	Agree
Habitat loss - Paradise shelduck (nesting, foraging).	Very Low	Very Low	Agree
Habitat loss - McCann's skink.	Very Low	Very Low	Agree
Habitat loss - Terrestrial invertebrates (six species).	Low	Low	Agree
Habitat loss - Terrestrial invertebrates (14 species).	Moderate	Moderate	Agree
Habitat loss - Terrestrial invertebrates (two species).	High	High	Agree
Indirect disturbance - Eastern falcon (construction noise).	Moderate	Moderate	Agree
Indirect disturbance - Eastern falcon (operational noise, light, human presence/ski field operation).	Low	Low	Agree
Indirect disturbance - NZ pipit (construction noise).	High	Moderate	Agree
Indirect disturbance - NZ pipit (operational noise, human presence/ski field operation).	Low	Low	Agree
Indirect disturbance - NZ pipit (light).	Very Low	Very Low	Agree
Indirect disturbance - Paradise duck (all disturbances).	Very Low	Very Low	Agree
Indirect disturbance - Kea (construction noise).	Very High	Moderate	Disagree. Table 18 gives an initial Very High level of effect for construction noise disturbance in the Doolans; this is reduced to a Moderate residual level of effect despite no management action being described.
Indirect disturbance - Kea (operational noise).	Very High	Low	The effects management actions for operational noise disturbance do not appear to be directly related to noise disturbance, and it is not clear how they reduce the level of effect all the way down from Very High to Low.
Indirect disturbance - Kea (human presence/ski field operation).	Very High	Low	Agree
Indirect disturbance - Kea (light).	Very High	Unknown	The effects management actions and residual level of effect for light disturbance on Kea are not displayed at all in Table 18.
Indirect disturbance - Australasian harrier (all disturbances).	Very Low	Very Low	Agree
Indirect disturbance - Southern black-backed gull (all disturbances).	Very Low	Very Low	Agree
Indirect disturbance - McCann's Skink (all disturbances).	Very low	Very low	Agree
Indirect disturbance - Terrestrial invertebrates (construction noise; 15 species).	Moderate	Moderate	Agree
Indirect disturbance - Terrestrial invertebrates (construction noise; seven species).	High	High	Agree

Effect	Level of Effect - Initial	Level of Effect - Residual	Wildlands Comment
Indirect disturbance - Terrestrial invertebrates (operational noise; 20 species).	Low	Low	Agree
Indirect disturbance - Terrestrial invertebrates (operational noise; two species).	Moderate	Unknown	*Xanthorhoe frigida* and *Pyrausta comastis* are given a moderate level of effect as a result of operational noise, but effects management and residual level of effect are not shown in Table 18.
Indirect disturbance - Terrestrial invertebrates (light; 20 species).	Very low (winter), Low (summer)	Very low (winter), Low (summer)	Agree
Indirect disturbance - Terrestrial invertebrates (light; two species).	Low (winter), Very High (summer)	Unknown	*Xanthorhoe frigida* and *Pyrausta comastis* are given a moderate level of effect as a result of artificial light in summer, but effects management and residual level of effect are not shown in Table 18.
Indirect disturbance - All Threatened plant species (human presence/ski field operation).	Moderate	Low	Agree
Construction material – Kea.	Very high	Low	Agree
Cumulative effects (vegetation loss).	Low	Low	Agree

In summary, Wildlands consider that e3S's has understated the scale of residual adverse effects for the following:

- Vegetation loss - North facing tussock grassland, Dracophyllum scrub;
- Vegetation loss - High alpine cushionfield;
- Vegetation loss - All other vegetation communities present in the Doolans;
- Indirect disturbance - Kea (construction noise and operational noise);
- Indirect disturbance - Kea (light).

Wildlands also note that the e3S conclusions about 'Indirect disturbance - Terrestrial invertebrates (operational noise and light; two species)', are given a moderate level of effect, which they do not disagree with. However, the effects management and residual level of effect are not shown in TEcIA Table 18: Assessment of Residual Effects, which raises uncertainty about whether the Terrestrial Compensation Project has accounted for these effects.

Terrestrial Ecology Management Plan (TEMP)

Because the TEMP has not been updated since Wildlands reviewed it in July 2026, Wildlands comments attached in **Appendix B** replicate the July comments provided to NZSki. In summary Wildlands comments:

- Note that the bird deterrent devices required for the Doolans Base Building are not included in the TEMP.
- Monitoring of High Alpine Cushionfield is less frequent than other vegetation, and this vegetation is not included in Table 6.1. No explanation is given for this. Given this is the most impacted vegetation type, this requires addressing otherwise there is higher risks that impacts on this vegetation will be missed by monitoring.
- Monitoring of the three wetlands in Table 6.2 should be 6-monthly for 2 years, whereas in Figure 6 it is set down for 6-monthly for one year. Wildlands note that there may be other inaccurate monitoring frequencies from information in Table 6.1 to those in Figure 6, however they have not checked every line.
- Wildlands consider that the wetlands should have an additional round of monitouring at 3 months to improve the chance of identifying an impact early enough to implement minimisation and/or mitigation measures.
- Wildlands consider that monitouring plant translocation in autumn months may be more practical and avoid the risk that late summer heat/draught impacts would not be identified or remedied until the following summer.
- Table 7.1 (reporting requirements) links some rows to the relevant conditions. Linking all rows to the relevant conditions would improve cross referencing.
- The relationship between the information in Section 6 and Table 7.1 of the TEMP is not clear. While the tables in Section 6 are primarily focused on risks/effects and management actions, they also have a column that details performance criteria for the different management actions.

- Table 7.1 only includes a low level of detail for some performance criteria, making the meaning of these criteria unclear.

In general, the inconsistencies identified in Table 7.1 of the TEMP make it difficult to assess the appropriateness of the proposed monitoring and reporting requirements. There is also the risk that these issues in the TEMP will lead to monitoring and reporting being carried out in an inconsistent manner.

Lizard Management Plan (LMP)

Many of the previously identified issues have now been resolved in the updated LMP. However, Wildlands state that it remains unclear whether or not the lizard survey was undertaken by suitably qualified herpetologists. It is therefore unclear whether the search effort is appropriate.

Table 1 in the revised LMP lists *Oligosoma* aff. *inconspicuum* "Central – Southern" as having a moderate likelihood of presence within the earthworks footprint, but specific management and contingencies for this species are not included in the LMP, other than the Incidental Discovery Protocol (IDP). Clarity is sought from the applicant regarding the likelihood of this species being present in the Proposal site, and further detail on lizard management is requested.

There remains a lack of certainty about whether the search effort for the orange spotted geckos within the earthworks footprint can be considered appropriate. Wildlands remain of the view that further surveys targeting orange-spotted gecko should be undertaken by suitably qualified herpetologists, although they acknowledge that overall **lizards are not a standout ecological feature** of the LMP site.

Management of effects on Lizards

Wildlands have reviewed the effects management hierarchy applied to the effects on lizards. They consider that it remains unclear whether any opportunities for avoidance have been sufficiently assessed.

Lizard salvage is not proposed as a means of minimising effects on lizards, instead the applicant proposes to undertake habitat minimization to reduce the number of lizards within the earthworks footprint prior to works commencing. Wildlands agree that habitat minimization via vegetation reduction has the potential to minimize the presence of lizards. Wildlands recommend that outcome monitoring of the management regime is undertaken to provide valuable knowledge about the success of this form of lizard mitigation. Further, Wildlands consider that, if implemented successfully, habitat reduction could reduce direct effects to lizards in lieu of a salvage, but it would not be sufficient to reduce these impacts to a minor level, and compensation would be appropriate to address residual effects to lizards.

Wildlands reiterate their previous comments that the habitat reduction methodology is not addressed adequately in the LMP (refer Recommendations below).[12]

[12] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 6.7.2

Remediation

Wildlands notes that there is a lack of detail around actions for remediating effects on lizards, including a lack of detail on the methodology and timing, and responsibilities. Monitoring details, and any adaptive management actions or specific triggers around determining and ensuring the success of rock piles for lizard habitat remediation should be included in the LMP.

Compensation

Wildlands note the uncertainty in understanding the effectiveness of the minimisation methods, which leads to uncertainty in determining residual effects, and therefore uncertainty in determining compensation values. They suggest implementing testing methods to determine this prior to the LMP implementation to help determine if additional compensation is required at an early stage.

Wildlands remain of the view that the eDNA study proposal is not a suitable form of compensation as there is no evidence that development of this tool will lead to ecological benefits. Wildlands states that it is considered bad practice to trade quantifiable ecological value for ecological knowledge, the value of which is substantially more speculative. Wildlands note that the NPS-IB[13] states that a financial contribution should only be considered if there is no effective option available for delivering biodiversity gains on the ground (which they consider there is), and it directly funds an intended biodiversity gain that complies with the other principles of biodiversity compensation, which does not appear to be demonstrated.[14]

The other compensation proposal includes the Lakes skink translocation proposal. Wildlands consider there is likely to be perceived ecological benefit of translocating Lakes skink into a predator-proof fenced sanctuary as per the overall proposal scope and methods as outlined in the LMP, if overseen by a suitably qualified herpetologist. However, there is no mention of monitoring of Lakes skink once translocation has taken place (either in the fenced sanctuary or of the source populations) or any associated contingencies. These are considered key requirements and details should be added to address this.

The application states that $20,000 will be set aside for the Lakes skink translocation project. Wildlands state that certainty should be provided to ensure that the translocation project will be successfully implemented in full, including monitoring of the proposal.

If certainty around monitoring and funding of the Lakes skink translocation proposal is provided, then Wildlands consider that the addition of this proposal within the revised LMP provides more confidence that the LMP is consistent with the objective of the NPS-IB (Section 2.1 (1) (a) and (b) (iii) (Objective)) to maintain no overall loss in indigenous biodiversity, through the conservation of a 'Threatened –Nationally Vulnerable' species.

Finally, an additional $20,000 contingency fund is proposed as compensation in the event that the mitigation measures in Sections 4.4.2 (habitat reduction) and 4.4.3 (lizard

[13] National Policy Statement for Indigenous Biodiversity, Appendix 4 clause 10.

[14] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 6.7.4

activity) of the LMP are not implemented properly or are found to be too restrictive. Wildlands state that this extra contingency is not considered appropriate as no detail is provided that is consistent with the NPS-IB compensation guidelines (Appendix 4, NPS-IB), other than Section 4.7.3 of the revised LMP noting that the additional funding will be added to the existing compensation package. More information is required detailing what this additional compensation will add to the proposed compensation projects. More detail is also required regarding how compliance will be determined for the mitigation in Sections 4.4.2 and 4.4.3 and the specific triggers for non-compliance to trigger the additional compensation funding.

Biodiversity Compensation Project

Section 4 of the updated Resource Consent Conditions, along with the Effects Management and Compensation Overview Addendum, provide detail on the updated Biodiversity Compensation Project. This project is the sole compensation action intended to deal with all residual effects identified in the updated TEcIA (except for lizard-related effects, which are compensated separately as discussed above).

The original Biodiversity Compensation Project required payment of $75,000 annually until 13.8 hectares of indigenous habitat was revegetated. The updated project now requires payments of $75,000 annually for the duration of the Doolans concession (adjusted for inflation each year), with the preference for the money to go towards predator control or indigenous revegetation planting.

As in the original Resource Consent Conditions, no biodiversity accounting methodology or other form of modelling appears to have been used in order to quantify the benefit of the Biodiversity Compensation Project. While compensation does not aim for no-net-loss/net-gain outcomes with like-for-like biodiversity values, Wildlands state that good practice compensation should still aim to deliver quantifiable benefits that incorporate factors considered in offsetting models, such as time lag, and the likelihood of success.

Wildlands make the following comments about the applicants Biodiversity Compensation Project:[15]

- Revegetation and/or predator control projects in unspecified locations are very unlikely to be an adequate level of compensation for the large number of “Moderate” or higher residual effects identified in the updated TEcIA.
- As much of the ecological benefit will be delivered many years in the future means there will be a substantial time lag between the negative ecological effects of the project and the benefits realised through the Biodiversity Compensation Project.
- The conditions do not specify any level of ecological similarity or spatial proximity between the residual effects in the Doolans, and the benefits that are funded through the Biodiversity Compensation Project. Theoretically, all of the money could be spent on lowland predator control within the North Island without breaching the conditions.

[15] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 7.2

- A higher quality compensation outcome would be achieved if the conditions specify that the Biodiversity Compensation Project must focus on similar (albeit not like-for-like) ecosystems to those impacted, e.g. indigenous grasslands and wetlands in the Remarkables ED and/or adjacent EDs.
- The proposed Biodiversity Compensation Project does not represent a high-quality approach to compensating residual effects, and the amount of money put towards compensation has not been substantiated[16].

Wildlands remain highly concerned about conditions in BIO.7-12 which require the development of the Biodiversity Compensation Project Plan. Wildlands state that they are unable to review the Plan because it does not yet exist, which raises the risk that an insufficient plan will be submitted after irreversible ecological impacts have occurred.

Condition BIO.10 gives the details that the Biodiversity Compensation Project Plan must specify, and BIO.7 requires it to be developed within 18 months of the start of construction in the Doolans. Wildlands note that this condition does not include any requirements for the plan to show how the compensation will relate to and manage the residual effects identified in the updated TEcIA, which they do not consider to be 'best practice'.

The applicant's Effects Management and Compensation Overview Addendum notes that the proposed compensation approach does not meet the principles of compensation in the NPS-IB and National Policy Statement for Freshwater Management (NPS-FM) and has not been informed by any modelling. The applicant's argument is that the project's overall benefits are large enough to outweigh the residual ecological effects. Wildlands consider that this argument is unsubstantiated.

Climate Change Considerations

Wildlands note that the assessment does not explicitly address future climate change impacts, which is required under the NPS-IB[17], despite being mentioned in initial documents. Future resilience and effects management under changing climate conditions are not incorporated into management plans.

Conditions

Condition ECO.2 (f)(ii) requires a methodology for the identification of the plant species set out in ECO.10. ECO.10 explains what species this applies to, pointing to Attachments B and C. The identification methodology is not provided in these conditions nor attachments. This requires correcting. provided.

[16] Wildlands NZSki Remarkables Ski Field Expansion Updated Terrestrial Ecology Review, September 2026, Section 9.0

[17] National Policy Statement on Indigenous Biodiversity, Policy 4

Recommendations

Several recommendations are made by Wildlands about addressing issues they have identified in the Terrestrial Assessment. These recommendations are summarised above and set out in more detail in the peer review report, **Appendix C**.

Conclusion

Wildlands agree with e3S that the proposal will result in residual adverse effects, several of which are assessed a **high level of effect** within a **significant natural area**. The Wildlands peer review identifies elements of the effects assessment that they do not agree with, at Table 10 of the peer review. They identify that some of the residual adverse effects have not been accounted for or that are understated. Both of these factors have implications for the composition of the Biodiversity Compensation Project. In addition, Wildlands considers that the proposed Biodiversity Compensation Project does not represent a high-quality approach to compensating residual effects, and the amount of money put towards compensation has not been substantiated. These factors lead to Wildlands' observation that the proposed draft Biodiversity Compensation Project does not align the principles for compensation in the NPS-IB and NPS-FM. This remains a significant concern for CODC.

3.3. Effects on Landscape and Natural Character Values and Visual Effects

Summary of Conclusions/Areas of Disagreement

Mr Ben Espie of Vivian Espie undertook two peer reviews of the applicant's Landscape and Visual Effects Assessment (**LEA**) undertaken by Boffa Miskell Ltd (**BML** (substantive application B.03A)). Mr Espie undertook an initial peer review, dated 3 July 2026. BLM responded to the peer review comments in a memo, dated 26 August 2026 (which has been provided to the Panel). Mr Espie's second peer review (dated 14 October 2026) considered BMLs comments dated 26 August 2026.

The comments and questions raised by Mr Espie in his initial review have been addressed by BML to Mr Espie's satisfaction. Both expert landscape architects, for the most part, agree on the nature and scale of the actual and potential adverse effects the proposal will generate on natural character values, landscape values and visual amenity effects. For ease of reference, we attach both of Mr Espie's peer review comments in **Appendix D**.

A summary of landscape architects' conclusions are:

Natural Character Effects

The MWL LEA[18] concludes that the Doolans Basin catchment currently displays very

[18] Section 6.1.2 of the BML Landscape and Visual Effects Assessment, dated 7 May 2026

high natural character due to intact alpine landforms, unmodified hydrological processes, and indigenous alpine vegetation. The proposal would introduce new structures, earthworks, access roads and increased human activity into a currently unmodified environment. As a result, natural character effects within this catchment, including those on the perceptual aspects of natural character associated with the introduction of built form and infrastructure into a currently unmodified alpine basin, will arise.

In relation to natural character effects, both landscape architects agree[19] that:

- natural character effects in the Doolans catchment are **moderate-to-high**;
- natural character effects in relation to modification of an existing alpine tarn to form a water storage reservoir are **very high**.

BML acknowledge that these effects cannot be entirely avoided. Mitigation proposed, including sediment and erosion controls, maintaining hydrological connectivity through culverts, and long-term weed management, are proposed to reduce adverse residual natural character effects for other freshwater environments within the Doolans Basin.

Landscape Effects on values of the Outstanding Natural Landscape
Effects on the values of the Rastus Burn catchment, which is predominantly within the QLDC jurisdiction however the upper slopes of the project site above the Ski-Area Sub Zone are within Central Otago District, have been considered. The BML LEA concludes that, within the Rastus Burn catchment, the existing ski field development has modified landscape character. The proposed upgrades, including the expansion of the gondola base station and lower gondola alignment, would be perceived as consistent with the established ski field context. Effects on landscape values in this lower part of the Rastus Burn catchment are therefore assessed as **low** overall. Mr Espie agrees with this conclusion.

However, BML[20] conclude that **moderate** adverse landscape effects are identified where new infrastructure extends into less modified areas of the Rastus Burn catchment, particularly around the gondola mid-station on Helicopter Ridge and along the associated ski return trails, which are areas within the CODC jurisdiction. In these locations, earthworks and retaining structures introduce man-made patterns along a currently intact rocky ridgeline, reducing landform legibility and naturalness. The BML report concludes that these effects are relatively localised and would be experienced in the context of the existing ski field. Mr Espie considers these adverse effects will be **moderate-high**.

In contrast, within the Doolans Basin, 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. The effects are assessed as **high** during construction and likely remain **high in the long term**, despite careful siting, consolidation of infrastructure, recessive design and colour treatment, and minimization of earthworks. Mr Espie agrees with this conclusion. BML

[19] Although Mr Espie clarifies that ecological/hydrological effects are not within his area of expertise, so he has not commented on that aspect of natural character effects, Mr Espie Peer review comments dated 3 July 2026.
[20] BML Landscape and Visual Effects Assessment, dated 7 May 2026, section 6.21

note that the area affected by the landscape change is spatially and visually confined within a small part of the wider Remarkables Conservation Area and ONL.

Visual Effects

The BML LEA considers visual effects from a range of viewpoints. The LEA concludes that visual effects within the Rastus Burn visual catchment, of which the upper slopes and ridgeline are within Central Otago District, are generally **low**, with visibility primarily limited to short sections of the ski field access road and viewpoints within the existing ski field. Mr Espie agrees that the effects are **low** given the works are seen within the context of the ski access road and ski field.[21]

Mr Espie notes the BML response memo (26 August 2026) explains that the ability to internally light the gondola, base station and mid-station is required between 6:30am and 5:30pm during winter. Mr Espie considers that this lighting of the structure on the ridgeline will contribute to the mid-station building, which is located within the Central Otago Lakes District, and on the ridgeline, having a **low-moderate** degree of adverse visual effect as experienced from distant views from the Wakatipu Basin. This differs from the conclusion by the applicant's landscape architect, which considers the visual effects of the mid-station building from more distant views to be **very low**.[22]

Section 6.3.3 of the LEA finds a **moderate to high** degree of adverse visual effects as experienced from the wider Doolans Basin catchment, depending upon viewing distance. Once rehabilitation is complete, it is found that visual effects of earthworks would reduce to **moderate**. Mr Espie considers this to be plausible, noting that the visual change within the part of the Doolans close to the new elements will be quite a departure from the existing aesthetic pattern.

Section 6.3.4 of the LEA finds that adverse visual effects as experienced from the Wye Creek Route and Remarkables Conservation Area more generally will range between **very low** (Doolans Right Branch) to **moderate** (the ridge between Wye and Doolans catchments). Mr Espie agrees.

Recommendations

Clarification of the material of retaining structures: The Applicant states that, subject to detailed design, it is preferred to use gabion basket retaining structures. If alternative solutions are required, retaining structures will be designed to minimize visual effects, which may include rock facing. This approach is appropriate. However, while there are proposed conditions requiring detailed design drawings to be submitted to the consent authority, there is no condition requiring retaining structures to be of gabion baskets or stone facing. Mr Espie considers that this should be rectified.

A comment to address this is included in the Comments on Conditions document in **Appendix A**.

[21] BML Landscape and Visual Effects Assessment, dated 7 May 2026, section 6.3.1

[22] BML Landscape and Visual Effects Assessment, dated 7 May 2026, Section 6.3.5

Conclusion

Both landscape architects agree that adverse effects on landscape values will be **high** during construction and in the long term due to the area being a currently undeveloped alpine environment. In relation to natural character effects, the adverse effects range from **moderate-high** to **very high**. Visual effects are assessed to be **moderate to high** when experienced from the wider Doolans Basin catchment.

3.4. Historic Heritage Effects

Summary of Conclusions/Areas of Disagreement

Council expert peer reviewer, Dr Chris Jennings of Origin Heritage, has reviewed the New Zealand Heritage Properties Ltd (NZHPL) Heritage Assessment, dated March 2026, that is part of NZSki's substantive application (Part B-06A). Dr Jennings undertook a peer review of the NZHPL Draft Heritage Assessment in April 2026 and undertook a subsequent review of NZSki's updated application documents in October 2026. This peer review is attached in **Appendix E**.

Dr Jennings notes that the recommendations he made in his initial peer review have not been adopted by NZHPL in the final Heritage Assessment, and therefore his recommendations remain the same.

Dr Jennings states that the authors of the Heritage Assessment undertook exhaustive background research and undertook a field survey to identify any potential heritage sites within the project area. As **no heritage/archaeological sites were identified** during the Heritage Assessment research and fieldwork, NZHP concluded that the proposed area for skifield expansion in the Doolans Basin does not possess values distinct from the Remarkables Conservation Area. Accordingly, NZHP considers the proposed Doolans Basin expansion site to have low heritage values and note that the proposed works will have **no impact on historic heritage**.

However, Dr Jennings considers that, while part of the navigable terrain within the project area was surveyed, the Doolans Water Intake and Access and the western bank of Doolans Creek were not surveyed. Dr Jennings states that while the altitude and setting indicate that there is less likelihood for archaeological or heritage sites in the project area, the parts of the project area that were ***not*** **surveyed are locations with the highest potential for archaeological or heritage sites**.

Recommendations

Dr Jennings considers that there is a 'non-zero' chance for archaeological or heritage sites being present within the unsurveyed areas of the project site in the Doolans. Dr Jennings therefore recommends that:

1. The applicant heritage experts complete field surveys to include the missing Doolans Water Intake and Access components of the project, and the bank of Doolans Creek where located inside the project area.
2. Then update the Heritage Assessment to include this additional fieldwork.

3. If any additional heritage/archaeological sites are found, these must be evaluated within the proposed assessment methodology and the report updated accordingly.

The additional survey work recommended to be undertaken could be required via conditions of consent. Any condition would need to ensure the works undertaken prior to construction works (site works, earthworks, or vegetation clearance) and outline the requirement for managing archaeological or historic heritage items if found during the survey.

Dr Jennings also considers that the Accidental Discovery Protocol condition (Condition GC.19) requires amendment to cover suspected post-1990 heritage sites and include co-ordination with the Department of Conservation. The re-drafting of the Accidental Discovery Protocol condition should be undertaken with engagement with CODC, QLDC, Department of Conservation, Heritage New Zealand Pouhere taonga and Papatipu Rūnaka to identify appropriate lines of reporting to notify the event of suspected archaeological/heritage sites.

Conclusion

The field surveys undertaken by the applicant's experts to identify any potential heritage sites within parts of the project area concluded that the project will have no impact on heritage values within the areas surveyed. However, additional surveys are considered necessary before it can be concluded that the project will not impact heritage values within Doolans Water Intake and Access components of the project, and within the bank of Doolans Creek areas, that were not surveyed.

3.5. Noise and Vibration Effects

Summary of Conclusions/Areas of Disagreement

CODC engaged Acoustic and Vibration Consultant Mr Jon Styles of Styles Group to undertake a peer review of the operational noise and vibration assessment report prepared by EMM for NZSki, which forms part of the substantive application (Part B-25A). Mr Styles' peer review, dated 30 September 2026 (refer **Appendix F**) concludes that the EMM report is comprehensive and addresses the technical noise and vibration issues sufficiently, subject to the following matters.

Mr Styles notes that the Proposal involves a significant amount of construction work in the Doolans Basin. This includes rock breaking, drilling and blasting, helicopter work and other noisy activities. In terms of operational noise, operational noise sources in the Doolans Basin will be limited to the noise of skiers using the facilities and the mechanical sources associated with the Gondola, water pumping infrastructure and similar. These sources are expected to be relatively quiet.

Mr Styles notes that the EMM Report correctly identifies the relevant noise and vibration controls from the CODP for the construction and operational phases of the Proposal. However, he does not agree with the way EMM has applied the noise rules in the following circumstances:

- The relevant operational and construction noise standards in the CODP apply at any receiver, including those that physically exist and those that may be present in the future. In contrast, the EMM Report only addresses the effects on receivers that physically exist now. This is an issue in the QLDC and CODC jurisdictions.

  Mr Styles states that there are only two landholdings in the CODC jurisdiction that might be affected by operational or construction noise from the Proposal. These are the two large land holdings to the east and south of the Doolans Basin, both are Conservation Land. The EMM Report doesn't consider any effects on these landholdings as they currently do not have any physically existing dwellings or other noise sensitive activities on them. Because there is no permitted activity pathway for establishing dwellings on either neighbouring site, it is unlikely that other types of noise sensitive activities will be established. Therefore, Mr Styles acknowledges that EMMs findings that the proposal will comply with the relevant noise standards remain valid.[23]

- The EMM report assesses the noise generated by helicopters when they are used for construction activities. EMM assesses helicopter noise as operational noise, whereas Mr Styles considers it to be construction noise. However, Mr Styles states that the information provided in the EMM Report is sufficient to determine that noise from helicopter usage will comply with the relevant construction noise standards.

- The EMM report does not address potential noise effects on fauna and recreational users in a meaningful way. However, Mr Styles notes that noise effects on recreational users are assessed in the Recreational Assessment (discussed in this report below), and the Terrestrial Ecological Impact Assessment includes an assessment of construction and operational noise on fauna.

In summary, Mr Styles agrees with the EMM report that **the proposal can comply with the relevant CODP noise rules and standards for both construction and operational phases of the proposal**. He also agrees that the CEMP is sufficient to ensure that noise emissions are managed to comply with the construction noise standards.

Recommendations
No recommendations are made.

Conclusion
Noise and vibration effects generated during the construction of the project and once the proposal is operational are considered to be acceptable and will be managed to comply with the relevant CODP provisions.

[23] EMM Noise and Vibration Effects Assessment, dated 12 May 2026, Sections 10.1 and 10.2.

3.6. Recreational Effects

Summary of Conclusions/Areas of Disagreement

The substantive application includes an assessment of effects of the proposal on recreational users of the wider area, prepared by Rob Greenaway & Associates, dated May 2026 (substantive application **B-07**). A peer review of a draft version of this report was undertaken by CODCs Parks and Recreation Manager Gordon Bailey, on behalf of CODC. The comments provided on the draft report stated that no gaps were identified in the report.

CODC's technical expert agrees with the conclusions of the Recreational Assessment that the proposal will have positive regional effects on the scale of commercially available skiing terrain and opportunity. The assessment concludes that adverse effects on recreational values during the three-year summer construction season will be '**very high**' on recreational users, albeit temporary. The assessment concludes that the proposal will also result in a '**very high or high**' adverse effect on regionally accessible backcountry winter ski sport activities, considering their relatively low level of availability, which the CODC peer reviewer agrees with. The assessment also identified adverse effects on users of the area for recreation purposes in the summer, which includes hunting, and found adverse effects on these users to be minor due to the relatively low number of users.

A key proposed mitigation measure is the development of a Recreation User Group (**RUG**) made up of representatives of the wider and relevant Queenstown recreation community and commercial users of the Remarkables and Hector Mountains, and the Department of Conservation (if interested). The RUG's role would be to liaise with NZSki regarding options for recreation access and management within the Ski Area, and NZSki's role in facilitating wider recreation opportunities in the Remarkables and Hector area. This would require NZSki appointing an employee with responsibility for community engagement, including liaison with, and participation in, the RUG.

However, regarding the conclusions made, Mr Bailey considers that the conclusion is unclear in terms of the balance of impact between allowing more people to access the area via a mass recreation experience of skiing within a commercial ski field where mechanical access is provided, and the adverse effect on existing 'backcountry' ski touring and split boarding experience which requires more effort on the part of the user. The review sought a more fulsome assessment of the opportunities that will be provided for the current users in areas adjacent to the extension area, before then reaching an overall conclusion regarding the impacts on existing users.

In response to these comments, NZSki stated[24] that the proposal will allow for deeper access into the Remarkables Conservation Area for winter sports via its enhanced

[24] NZSki's response to the comments on the Recreational Report are set out in the document entitled 'E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.' Document is not dated.

access provision, in the same way that the existing ski area currently facilitates access into Doolans Basin. However, the other recreation opportunity settings are beyond the consenting footprint and may require further development within the Remarkables Conservation Area to be fully realised. The response comments note that there are no simple like-for-like winter sports setting immediately adjacent to the Doolans area, but many of the winter backcountry snow activities can be conducted in the Conservation Area. Developing these opportunities is beyond the scope of this assessment, which is why the ongoing commitment by NZSki via the RUG has been identified as the best avenue.

The applicant states that the Recreational Values Assessment cannot guarantee what the outcomes of the RUG will be, and the degree to which the Department of Conservation will permit additional development for casual recreation in the Conservation Area (such as access tracks and huts). No changes were made to the Recreation Assessment in response to the comments from CODC.

The Recreation Assessment Report identifies the following mitigation measures:

- Ensuring unrestricted physical access when safe, promoting affordable "one up-one down" [25] ski lift passes for backcountry ski tourers (which are currently offered but are not effectively promoted);
- A 'leave no trace' design philosophy and financial bonds for infrastructure removal are also advocated by stakeholder groups;
- The formation of a Recreation User Group (RUG), made up of representatives of the wider and relevant Queenstown recreation community and commercial users of the Remarkables and Hector Mountains, and the Department of Conservation (if interested). The RUG's role would be to liaise with NZSki regarding options for recreation access and management within the Ski Area, and NZSki's role in facilitating wider recreation opportunities in the Remarkables and Hector area. This would require NZSki appointing an employee with responsibility for community engagement, including liaison with, and participation in, the RUG.

The EMM Noise and Vibration Effects Assessment addressed potential noise effects on recreational users of the Doolans Basin. EMM recommended establishing communication channels via a RUG to advise on construction works timing and activities to assist with mitigating construction noise effects on these parties.[26]

Recommendations

Conditions RUG.01 – RUG.04 set out the requirement for the consent holder to form the Recreation User Group and the objectives of the group. Mr Bailey states that these conditions are considered to be adequate, with the exception of the following:

- There is no condition that requires the promoting of the one-up one-down ski pass, which is used by back country skiers to gain access to the backcountry. The

[25] The "one-up One-down" ski lift pass allows the holder to ride the ski lifts for one trip and up one trip down in order to gain easier and faster access to the backcountry, at a price less than the full day lift pass price.
[26] EMM Noise and Vibration Effects Assessment, dated 12 May 2026, section 10.3

promotion of this pass could be facilitated by the RUG, and it is suggested that condition RUG.02 is amended to include this;
- No conditions are suggested to require any redundant equipment be removed from Doolans Basin. A condition is considered necessary to enforce this.
- If a financial bond is deemed necessary to ensure ski field infrastructure is removed from the site in the event of the skifield's liquidation or similar, this is more appropriately addressed via the Department of Conservation Concession than a resource consent.

Conclusion

The peer review of the Recreation Assessment did not dispute the findings that the proposal will result in:

- **positive regional effects** on the scale of commercially available skiing terrain and opportunity,
- **very high** but temporary adverse effects on recreational values for users of the area in summer during the construction period;
- **very high or high** adverse effect on regionally accessible backcountry winter ski sport activities once the proposal is operational;
- **minor** adverse effects on recreational users of the area in summer once the proposal is operational, including hunting.

3.7. Natural Hazards

Summary of Conclusions/Areas of Disagreement

Mr Cruden was engaged by CODC to undertake a peer review of the natural hazard elements of the substantive application, refer **Appendix G**. Mr Cruden's review considered the following documents:

- "Remarkables Ski Area Expansion Project, Natural Hazards Assessment", Stantec New Zealand, dated 29 April 2026 and associated draft development plans prepared by Southern Land.
- Further information provided by Stantec in a memo titled "Reference: Responses to Questions on Doolans Natural Hazards Assessment" dated 10 June 2026.
- Letter from Mitchell Daysh to Fiona Garrett (CODC), dated 31 July 2026.
- Document titled "Draft Resource Consent Conditions – 3 September 2026".

Following receipt of the further information provided by Stantec (dated 10 June 2026) in response to Mr Cruden's questions, he is satisfied that the application contains adequate information in the Natural Hazard Assessment, as the additional information provided has broadly satisfied his initial queries.

Recommendations

Mr Cruden recommends changes to the conditions, as set out in his peer view memo (**Appendix G**). These suggested changes have been annotated in the Conditions Tables (**Appendix A**) with minor changes to reflect the mechanics of the suggested conditions.

Conclusion

The peer review concludes that the actual and potential adverse effects associated with natural hazards can be **appropriately managed** via the project design and consent conditions.

3.8. Effects of 3-Water Services

Summary of Conclusions/Areas of Disagreement

None of the three waters infrastructure will connect to Council services and are all managed onsite. The wastewater will be piped and pumped across to the Rastus Burn side and connect with the existing wastewater system. Mr Anthony Steel and Mr Gerhard Fourie of Fluent undertook a peer review of the three-waters servicing proposal and assessment on behalf of CODC, dated 7 October 2026 (refer **Appendix H**). Following the applicant's responses to Fluent's questions arising via their first review of the proposal, Fluent are satisfied that all questions have been adequately responded to, or that matters can be addressed during the detailed design phase of the development. Fluent have advised that they are comfortable with the responses.

Recommendations

Outstanding matters relating to the Remarkables Ski Area Expansion Project Stormwater Concept Report (Part B.16) to be addressed at detailed design include:

- Erosion protection downstream of shallow diagonal swales shall be developed on a case by case basis during detailed design and during construction. Where required rip rap armouring and geofabric underlay should be appropriately sized for the runoff and velocities expected.

  Recommendation: Condition INF.7 requires amending to provide an avenue for CODC to approve the final design of the stormwater management design controls.

- Runoff from Gondola Mid Station and Gondola Return Station Roofs - primary drainage and secondary flow paths details should be confirmed during detailed design for compliance with the appropriate guidelines.

  Recommendation: Condition INF.7 requires amending to provide an avenue for CODC to approve the final design of the stormwater management design controls.

- Item 5 in the table identifies a tarn located above what is defined as Catchment B in Figure 18. Fluent understand that risks associated with erosion and sediment production appear to be during the construction phase, and careful and deliberate protection through well planned and approved erosion and sediment control would effectively manage this risk.

Recommendation: The draft Erosion and Sediment Control Plan should be updated to identify this risk to ensure it is appropriately managed during construction works.

- Catchments E & F and the proposed drainage approach - the detailed design should include the design for the outlet of the proposed armoured channel, as this channel will convey high concentrated flows during bigger rainfall events. The outfall from the channel should ensure management of downstream erosion at the concentrated outlet, and re-integration of the concentrated flow with natural flowpaths/watercourses.

  Recommendation: Condition INF.7 requires amending to provide an avenue for CODC to approve the final design of the stormwater management design controls.

In relation to the Remarkables Ski Area Expansion Project Natural Hazards Assessment (Part B.15), outstanding matters to be addressed at detailed design include:

- Flood risk associated with a blockage of the culvert in the unnamed creek adjacent to the Gondola Return Terminal and Base Building – Fluent acknowledge that the detailed design of these buildings is not yet complete. Fluent state that the critical condition at this location would not be the channel capacity dimension to the north, but the road elevation and culvert diameter where it crosses the watercourse. The proposed culvert diameter is 900mm, with say another 1m of fill over the culvert. Therefore, if the culvert is operating at full capacity, there will be headwater effect upstream of this road/culvert. Using inlet conditions for the culvert, and a flow of 1800 L/s, this could be as high as 1.5m or more, and this headwater relationship upstream of the road, to the building floor level should be addressed during detailed design to prove compliance with the NZBC.

  Fluent also note that blockage of the culvert could occur from debris movement of man-made items and articles. They recommend a conservative approach here would be to compare the water level for peak flow over the road, compared to the building level as a sensitivity scenario during detailed design.

  Recommendation: It is considered that this issue is a building consent matter, however, to ensure the advice from Fluent is not omitted, it is suggested that an *advice note* is included to address this matter in any consent issued for the proposal.

Conclusion

Three-water infrastructure matters are considered to be adequately addressed in the substantive application, subject to the above amendments to the conditions being made.

3.9. Construction Management

Summary of Conclusions/Areas of Disagreement

Mr Walt Denley, Land Development Engineer Manager, CODC has reviewed the Erosion and Sediment Control Assessment (Part B.27) prepared by Enviroscope, dated 14 May 2026, and the Draft Construction Environmental Management Plan (Part B.02) (**CEMP**) prepared by Enviroscope, dated 14 May 2026.

Mr Denley notes that the Erosion and Sediment Control Plan only provides a summary of the estimated yields and does not contain any of the details behind their sediment calculations. CODC would need to check their assumptions under this methodology in order to check the estimated yields they have provided.Mr Denley also notes there are a number of products that have been specified for use in the Erosion and Sediment Control Assessment that will require the Department of Conservations approval for use given the site is conservation land. For a typical resource consent application CODC would require evidence of this approval before considering them as part of the application.

Finally, Mr Denley notes that the 'temporary' access track shown on the plans from the top of the ridge down into the Doolans Basin will likely need to be permanent in order to facilitate maintenance and emergency access should people need to be evacuated from the Gondola if it were to stop working for any reason. Mr Denley is satisfied that the photos supplied indicate that the wheel tracks of vehicles will effectively create a permanent track if used semi consistently in this environment.

Recommendations

In order to ensure effects on terrestrial ecology and land stability are minimised during construction, amend condition CON.8 to require the CEMP to provide a clear process for selecting methods for managing sediment during construction, including:

a. Consultation with DOC given they are landowner and ideally will have consistency with the Concession;
b. Design and works to be supervised by suitably qualified and experience engineer.

As the "temporary track" is not expected to be temporary, the track design will need to ensure it is suitable to manage long term run off/sediment. Include a condition to ensure the design of the track is appropriate.

Update the plans to state that the track shown on the plans from the top of the ridge down into the Doolans Basin is to be permanent and not temporary to ensure the accuracy of the Proposal documents.

Conclusion

The management of the construction works and activities is considered to be adequately addressed in the application and actual and potential effects arising from construction activities can be appropriately managed via the CEMP, provided the recommendations outlined above are addressed.

3.10. Planning Assessment

Summary of Conclusions/Areas of Disagreement

Louise Taylor of Taylor Planning Ltd undertook a peer review of the substantive application that was updated by the applicant on 3 September 2026. Ms Taylor's peer review is attached in **Appendix I**.

Ms Taylor agrees with the list of resource consents that are required for the proposal under the **CODP**, with the exception that resource consent is also required to cover the five transformers proposed in the Doolans Basin under Discretionary Rule 13.6.16. Overall, she agrees that the activity status is a **non-complying** activity.

Relying on the technical assessments in the substantive application, and the peer reviews of this assessment undertaken on behalf of the CODC, she concludes that, in relation to landscape and visual effects:

- The proposal will result in moderate to **high**, to **very high** (high or very high effects equates to **significant**) adverse effects on the natural character values of the Doolans Basin Outstanding Natural Landscape, due to the undisturbed nature of this environment.

- Effects on the landscape values of the Doolans Basin Outstanding Natural Landscape are expected to be **high** (**significant**) and within the part of the Rastus Burn that is within the CODC jurisdiction, effects will be **moderate**.

- Visual effects of the proposal will be **low-moderate** for the Gondola mid station building which is located on Helicopter ridge, and **moderate to high** for the other infrastructure, earthworks and trails in the Doolans Basin in the short term and **moderate** in the longer term once revegetation of earthworks areas has been completed.

In relation to effects of terrestrial ecology Ms Taylor concludes that:

- The proposal will result in **numerous residual adverse effects** on terrestrial ecology that cannot be avoided, remedied or mitigated, and therefore the application proposes to compensate for these effects.

- The method for calculating ecological compensation for residual effects on terrestrial ecology does not follow best practice (based on advice from Wildlands) as proposed does not seek to result in a no net loss ecological outcome.

In relation to recreation values Ms Taylor states:

- The proposal will result in adverse effects on the recreational amenity values currently experienced by users of the Doolans Basin, in the summer, and partially in the winter when it is frequently used by back country skiers. However, the proposal will increase opportunities for commercial skiing.

Ms Talyor assessment of the relevant statutory considerations concludes that:

- The proposal does not achieve Objective 1 and Policy 7 of the NPS-IB as the proposed Biodiversity Compensation Package does not demonstrate that the Proposal will result in no overall loss of indigenous biodiversity.

- It is unclear if the relevant provisions of the now operative Otago Regional Policy Statement 2021 have been assessed in the substantive application.

- That the proposal does not achieve the environmental outcomes sought by key relevant objectives and policies in the Central Otago District Plan that seek to

    i. protect outstanding natural landscapes from inappropriate development (Objective 4.3.2, Policy 4.4.1);
    ii. maintain or enhance open space, natural character, and maintain the open natural character of the hills and ranges (Objective 4.3.3, Policy 4.4.2);
    iii. ensure that activities avoid, remedy or mitigate adverse effects on the open space, landscape, historic, natural character, natural quiet and amenity values of the quality and range of recreational opportunities available in, the District's back country and/or remote areas (Policy 4.4.14); and
    iv. protect areas of significant indigenous vegetation and significant habitats of indigenous fauna (Objective 4.3.8 and Policy 4.4.7).

Ms Taylor has also suggested several changes to the conditions, refer **Appendix A**.

Conclusion

The proposal is located within an outstanding natural landscape and in an area with significant ecological values. While the substantive application demonstrates that many environmental effects can be appropriately managed (with appropriate conditions), the proposal will result in significant adverse effects on landscape and natural character values, residual effects on terrestrial ecology as well as regionally significant economic benefits. It is for the Panel to come to conclusions regarding whether the adverse impacts of the project are sufficiently significant to be out of proportion with the project's regional or national benefits in terms of s85(3).

3.11. Overall Conclusion

Overall, the CODCs economic expert considers that the Project is likely to meet the purpose of the Fast Track Act in so far as economic benefits are concerned, however she considers that some caution is warranted in adopting the full extent of gross economic impacts reported in the EA Report, and that the benefits will be largely limited to Queenstown Lakes District, with spill - over benefits to the rest of Otago

Region only minor.

The other technical experts indicate a high level of agreement with the technical assessments in the substantive application, and considerable work has been undertaken to address information gaps and areas of disagreement prior to this stage in the process. The key exception to this is the terrestrial ecology assessment where CODC's technical experts remain concerned about the level of effect attributed to some of the residual ecological effects, the methodology undertaken to assess the effects and the omission of some residual effects from the overall effects assessment that has informed the Biodiversity Compensation Project. They also remain concerned that the Biodiversity Compensation Project will not align with the principles of the NPS-IB and the NPS-F, amongst other matters.

The substantive application demonstrates that many other environmental effects can be adequately managed, with appropriate conditions. However, the proposal will result in adverse effects on recreational amenity values, and significant adverse effects on landscape and natural character values within the Doolans Basin that cannot be mitigated further. As set out in Section 2 of this report, the Doolans' natural character values, outstanding landscape values, ecological values and open space are enjoyed by Central Otago District residents and are valued as fundamental to the well-being and the way of life of residents in the District. While the proposal will also provide increased opportunity for recreational skiing alongside the regionally significant economic benefits, these benefits must be considered alongside the identified adverse environmental effects.

Appendices:

A. Comments on Conditions

B. Technical Expert - Economic Assessment

C. Technical Expert - Terrestrial Ecology Assessments

D. Technical Expert - Landscape Effects Assessment

E. Technical Expert - Historic Heritage Assessments

F. Technical Expert - Noise and Vibration Assessment

G. Technical Expert - Natural Hazards Assessment

H. Technical Expert - 3- Waters Assessment

I. Technical Expert - Planning Assessment