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Planning

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Reference: NZSki Fast Track

To	Central Otago District Council
Attn	Fiona Garrett, Planning Manager
From	Louise Taylor, Director
Date	27 October 2026

Peer Review Planning Assessment

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**

Executive Summary

1. This report provides planning comments on the application by NZSki Limited (NZSki) in relation to the Remarkables Ski Field Upgrade and Doolans Expansion Project (the Project or Proposal) on behalf of the Central Otago District Council (CODC). Insofar as it relates to the Central Otago District, the Project seeks to expand the lift-accessible skiable terrain by approximately 262 hectares by expanding into the adjacent Doolans Basin. The Doolans Basin will be accessed via a newly established gondola and ski trails. The Project seeks to authorise the construction, operation, use and ongoing maintenance of all activities and structures described in section 3 (refer document A.10) of the substantive application documents and shown in the plans contained in Part C of the substantive application.

2. The substantive application has been prepared by Mitchell Daysh, with input from a range of technical experts. Rather than replicate an assessment of the application, this report provides an independent planning peer review of the application for the purpose of providing comments to the Expert Panel appointed to consider the application.

3. The key conclusions of this report are:
    a. Resource consent is required for numerous activities which make up the project in the Central Otago District. In addition to the list set out in the application, I consider resource consent is also required to cover the five transformers proposed in the Doolans Basin under Discretionary Rule 13.6.16. Overall resource consent is required for a **non-complying activity**.
    b. The Proposal is expected to meet the purpose of the Fast-track Approvals Act 2024 in so far as economic benefits are concerned and result in at least regionally significant economic benefits.
    c. 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, due to the undisturbed nature of this environment, and these effects cannot be further reduced.
    d. Effects on the landscape values of the Doolans Basin ONL are expected to be high (significant) and within the part of the Rastus Burn that is within the CODC jurisdiction, effects will be moderate.
    e. 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;
    f. The proposal will result in several residual adverse effects on terrestrial ecology that cannot be avoided, remedied or mitigated, and therefore the application proposes to compensate for these effects;
    g. The method for calculating ecological compensation for residual effects does not follow best practice (based on advice from Wildlands) and as proposed does not seek to result in a no net loss ecological outcome;
    h. In my view, 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.
    i. 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.

j. In terms of the now operative Otago Regional Policy Statement 2021, it is unclear if the final operative version of the relevant policies has been assessed in the substantive application.

k. In my view 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).

Introduction

4. My name is Louise Elizabeth Robertson Taylor. I am a Director of Taylor Planning Limited. I hold a Bachelor's degree in Geography (1995) and a Master's degree in Regional and Resource Planning (1997), both obtained from the University of Otago. I have nearly 30 years' experience within the planning and resource management field. My practice has included work for local authorities, central government agencies, not for profits, private companies and private individuals, primarily as an independent planning consultant. My experience relates to resource consent applications, designations, submissions and district plan development under the Resource Management Act 1991, Covid-19 Recovery (Fast-track Consenting) Act 2020 and the Fast-Track Approvals Act 2024 across landuse, subdivision, infrastructure, water, discharges and coastal subjects. I regularly provide expert planning evidence on behalf of applicants, submitters and Councils at consenting hearings.

5. I am an accredited Hearings Commissioner (including Chair endorsement) and have heard and decided numerous cases (primarily resource consent applications) throughout Otago, Canterbury and Southland.

6. I am engaged by Central Otago District Council to provide an independent review of the planning application for the Remarkables Ski Field Upgrade and Doolans Expansion Project.

7. I confirm that my peer review comments have been prepared in accordance with the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's Practice Note 2023. This peer review is within my area of expertise, except where I state that I rely upon the evidence of other experts. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

8. In preparing this report I have reviewed the substantive application lodged on 16 May 2026, the documents that are part of the substantive application that were updated and resubmitted on 3 September 2026, the initial peer review reports and the second peer review reports prepared on behalf of CODC.

9. I am very familiar with Queenstown and Central Otago Districts, and visited the Remarkables ski field (including viewing the Doolans Basin via helicopter) for the purposes of this project on 25 May 2026. I have attended various meetings and technical workshops hosted by the applicant.

10. In this report I provide:
    a. Comment on the substantive applications identification of the consents required for the Proposal under the Central Otago District Plan;
    b. A summary of the actual and potential environmental effects anticipated to result from the proposal;
    c. Comment on relevant statutory considerations, including the applications assessment of relevant objectives and policies; and
    d. Comment on the suggested conditions.

11. I acknowledge that 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 of the project's regional or national benefits in terms of s85(3). I have not made a recommendation in this regard.

Resource Consents Required under the Central Otago District Plan

12. That part of the project site within Central Otago District is within the Rural Resource Area and is subject to an Outstanding Natural Landscape Overlay in the Central Otago District Plan (CODP).

13. I consider the following activities require resource consent under the CODP:
    a. A land use consent as a non-complying activity for the establishment and use of the land as a retail activity (Doolans Base Building food and beverage facilities)[1];
    b. A land use consent as a discretionary activity for the establishment and use of land as a commercial recreational activity (skiing)[2];
    c. A land use consent as a discretionary activity for buildings (Doolans Gondola Towers 18 and 19, and Return Terminal, and the Water Intake Pump Building) located within 20m of the bank of any stream or river[3];
    d. A land use consent as a restricted discretionary activity for buildings (Doolans Gondola Towers, Midstation and Return Terminal, and Doolans Base Building) over 6m in height[4];
    e. A land use consent as a restricted discretionary activity for buildings across the Site finished with materials not listed by the standard and visible from over 2km away from a public place[5];
    f. A land use consent as a restricted discretionary activity for storage of construction materials in stockpiles across the Site that may remain in excess of 6 months[6];
    g. A land use consent as a restricted discretionary activity for earthworks and vegetation clearance across the Site within 10m of a water body[7];

[1] Rule 4.7.5iv
[2] Rule 4.7.4vii
[3] Rule 4.7.4i and Rule 4.7.6A.c
[4] Rule 4.7.3i and Rule 4.7.6A.f
[5] Rule 4.7.3iii and Rule 4.7.6D.a
[6] Rule 4.7.3i and Rule 4.7.6F
[7] Rule 4.7.3vi and Rule 4.7.6I

h. A land use consent as a restricted discretionary activity for earthworks across the Site exceeding 2,000m2 and 3,000m3, and earthworks across the Site for access roads exceeding 2m in height and cut[8];
i. A land use consent as a discretionary activity for removal of indigenous vegetation and draining of wetlands over 800m ASL across the Site[9];
j. A land use consent as a restricted discretionary activity for indigenous vegetation clearance across the Site above 1080m ASL[10];
k. A land use consent as a discretionary activity for erection of structures (Doolans Gondola Towers, Midstation and Return Terminal, Doolans Base Building, Learner Conveyor Belt, Snow Machines and Pump Buildings), and earthworks exceeding 20m3 and 50m2 in an Outstanding Natural Landscape[11];
l. A land use consent as a non-complying activity for erection of buildings within areas of potential solifluction, debris flow, seismic risk, wind risk and land instability likely to be subject to material damage from natural hazards[12];
m. A land use consent as a discretionary activity for erection a weir within the bed of Doolans Creek[13];
n. A land use consent as a discretionary activity for radiocommunications and telecommunications structures within an Outstanding Natural Landscape[14]; and
o. A land use consent as a discretionary activity for transformers within an Outstanding Natural Landscape[15].

14. Following comments provided by CODC as part of the completes check, the applicant has updated the Central Otago District Plan (CODP) rules assessment table (part G.01 3 September 2026) to demonstrate that the five proposed transformers comply with the relevant Infrastructure, Energy and Utilities Section rules. The updated assessment states that Rule 13.7.6 which provides for 'Buildings Ancillary to or Associated with Utilities' is complied with because the transformers

[8] Rule 4.7.3vi and Rule 4.7.6I
[9] Rule 4.7.3vi and Rule 4.7.6J
[10] Rule 4.7.4i and Rule 4.7.6K
[11] Rule 4.7.6KA
[12] Rule 4.7.4i and Rule 4.7.6L
[13] Rule 4.7.5.i
[14] Rule 5.7.3 and Rule 5.7.4A
[15] Rule 13.6.16

are less than 20m^2 in area and less than 4m in height. However, rule 13.7.6 (c) states that the rule does not apply to Outstanding Natural Landscapes. As the Doolans is identified as an area of Outstanding Natural Landscape in the Planning Maps, I consider that the transformers require resource consent as a discretionary activity under Rule 13.6.16 which captures any utility activity not specifically referred to in Section 13.

15. I agree with the applicant that as the most restrictive activity status is **non-complying**, using the bundling principle this is the overall activity status for the application under the CODP.

Evaluation of Assessment of Environmental Effects

Introduction

16. I have undertaken a review of the applicants Assessment of Effects (substantive application Part A.13, 3 Sept 2026). My comments below identify areas where I do not wholly agree with the applications assessment. My views are informed by the technical reports and the peer reviews undertaken where relevant. I am not in a position to comment on the applicant's assessment of Cultural Effects as I have not undertaken engagement with the relevant runanga on this matter.

Economic Effects

17. The Economic Assessment (EA) prepared by Benje Patterson on behalf of NZSki has been peer reviewed by Natalie Hampson on behalf of CODC. Both economic experts conclude that the project will result in regionally significant economic benefits. Overall, Ms Hampson considers that some caution is warranted in adopting the full extent of gross economic impacts reported in the EA Report, however she agrees with Mr Patterson that the Project is likely to meet the purpose of the Fast-track Approvals Act 2024 in so far as economic benefits are concerned. Based on these conclusions, it is my opinion that the proposal will have at least significant regional benefits.

Terrestrial Ecology Effects

18. The Wildlands peer review of the applicants Terrestrial Ecology Impact Assessment (Part B.12) (TEcIA) submitted in support of the application agrees that the TEcIA generally provides a highly detailed account of the terrestrial ecological values present. Indigenous vegetation is assessed as having high – very high ecological value, including lizards. The Project will result in approximately 15.94 hectares of indigenous vegetation disturbance across the Ratus Burn and Doolans Basin. Residual effects associated with loss of indigenous vegetation, effects on avifauna, effects on indigenous lizards and effects on invertebrates from habitat loss range from low to very high due to the sensitivity of the very natural Doolans Basin.

19. The Wildlands peer review identifies elements of the effects assessment that they do not agree with, and those they agree with, at Table 10 of the peer review. These effects range from negligible to very high, and after mitigation, negligible to high. In summary, the key **high adverse residual effects** identified include:

    a. Vegetation loss, high alpine cushionfield - applicant's ecologists consider the effect to be moderate however Wildlands do not agree;
    b. Vegetation loss - All other vegetation communities present in the Doolans - applicant's ecologists consider the effect to be moderate however Wildlands do not agree;
    c. Fragmentation/infrastructure impediment - North facing tussock grassland, Dracophyllum scrub, cushionfield, high alpine cushionfield, rockfield, and rocky outcrop) – high residual effect;
    d. Habitat loss - NZ Pipit (nesting below 1700m, foraging) - high residual effect;
    e. Habitat loss - Terrestrial invertebrates (two species) - high residual effect;
    f. Indirect disturbance - Kea (construction noise) – applicant's ecologist assess the residual effect as moderate however Wildlands do not agree;
    g. Indirect disturbance - Terrestrial invertebrates (construction noise; seven species) – applicant's ecologist assess the residual effect as moderate, Wildlands do not agree;
    h. Indirect disturbance - Kea (operational noise) - applicant's ecologist assess the residual effect as low, Wildlands do not agree;

i. Indirect disturbance - Kea (light) - applicant's ecologist assess the residual effect as 'unknown';
j. Indirect disturbance - Terrestrial invertebrates (construction noise; seven species) – residual effect assessment as high;

20. It is acknowledged by the applicant's and CODC's experts that all the identified ecological effects cannot be avoided, remedied or mitigated and therefore there will be residual adverse ecological effects. Wildland's peer review states that the key concern with the proposal is the adequacy of the proposed biodiversity compensation package. In its view, the updated TEcIA identifies a large number of "moderate" or higher residual effects across a wide range of different biodiversity values, and the proposed Biodiversity Compensation Project does not represent a high-quality approach to compensating these residual effects. Wildlands consider that the amount of money proposed to be put towards compensation has not been substantiated.

21. It is not possible to determine whether or not the compensation package will achieve a no net loss outcome as some residual adverse effects have not been accounted for. There is also uncertainty about what the Compensation Package will achieve given the final development of the Biodiversity Compensation Project is not required to be undertaken until 18 months after construction works in the Doolans has commenced. I consider that the Condition BOI.10 requires amending to ensure there is certainty about the objectives of the compensation project. However, I acknowledge that some elements of the applicant's TEcIA require addressing before the full ambit of residual effects that require compensation is understood and agreed between the ecologists.

22. In relation to the Lizard Management Plan, while I understand the survey effort was extensive (based on the Wildlands peer review), the herpetological experience of ecologists who undertook the survey is unclear, which leads to uncertainty about the effectiveness of the survey at targeting cryptic species. Therefore, some uncertainty about the likelihood of other species being present at the site remains. Clarification of the personnel who undertook the assessments is required before certainty about the scale of effects on lizards, and subsequently the appropriateness of the compensation package, can be provided. In terms of managing lizards, CODC accepts DOC is better place to work with the applicant

regarding details of lizard management, and considers there is no need for CODC to certify the lizard management plan (refer comments on conditions, **Appendix A**, CODC s53 Comments).

23. Based on the technical evidence, I have assessment the key provisions of relevant statutory documents in Table 1, **Attachment 1.** In particular regarding terrestrial ecology, I consider the proposal does not achieve Objective 1 or Policy 7 of the National Policy Statement for Indigenous Biodiversity ("NPS-IB") as it does not demonstrate a net-gain or no-net-loss ecological outcome. With respect to relevant provisions of the CODP, due to the identified residual adverse effects on biodiversity and the Biodiversity Compensation Package not achieving no net loss, it cannot be stated that the proposal will protect the SNAs in the Doolans Basin that will be impacted by the proposal. Accordingly, in my view the proposal does not achieve the environmental outcomes sought by Objecitve 4.3.8 or Policy 4.4.7.

Landscape, Natural Character and Visual Effects

24. The applicant's assessment of effects of the Doolans Expansion proposal on landscape and natural character values effects is informed the Landscape Effects Assessment (Part B.03). Mr Ben Espie peer reviewed the Landscape Assessment undertaken by Boffa Miskell, and a summary of this review is provided below.

25. Boffa Miskell considers the proposal will result in a moderate to high degree of adverse visual effect 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. He notes 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.

26. Mr Espie agrees with the Boffa Miskell assessment of visual effects except that Mr Espie considers that the lighting of the mid-station building, which is located within the Central Otago Lakes District, and on the ridgeline, will have a low-moderate degree of adverse visual effect as experienced from part of the Wakatipu Basin. The Boffa Miskell assessment categories this effect (the lighting of the mid-station building) as very low from these distant views.

27. CODCs jurisdiction starts below Helicopter Ridge on the Rastus Burn side of the ridge, and extends over the ridgeline into the Doolans Basin. Effects on landscape values are assessed as moderate on the upper slopes of the Rastus Burn 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 Central Otago District jurisdiction. Mr Espie however considers that the adverse landscape effects of the project that are outside of the Queenstown Lakes District Plan Ski-Area Sub Zone and are within the Central Otago District Rural Resource Area are better described as moderate-high because this part of the Rastus Burn catchment is as unmodified as the Doolans catchment.

28. 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.

29. The Doolans Basin displays very high natural character values due to intact alpine landforms, unmodified hydrological processes and indigenous alpine vegetation. Effects on the natural character of the area as a result of the earthworks associated with establishment of the cabin building, gondola towers, access roads, new water reservoir and new water take will occur. In relation to natural character effects, both landscape architects agree that:
    - natural character effects on these vegetation communities outside the wetlands, waterways and tarn areas will be moderate-to-high;
    - natural character effects on these vegetation communities within the wetlands and waterways will be moderate-to-high
    - the natural character effects on the tarn will be very high;
    - overall effects on the natural character of freshwater within the Doolans Basin will be moderate to high, and very high in relation to the conversion of the tarn to a water reservoir, even with mitigation measures in place.

30. Drawing on the technical evidence, I have assessed the key statutory provisions in Table 1, **Attachment 1**. The applicant states that overall, the proposal aligns with the relevant objectives and policies of the CODP. I do not agree with this conclusion.

31. I partially accept the views of the landscape architect experts that the proposal will result in adverse effects on the Doolans Basin ONL that do not achieve the outcomes sought by Objective 4.3.2 and Policy 4.4.1 which seek that the values are protected. However, these provisions require that the ONL values are protected from 'inappropriate development'. I accept that the CODP does not provide for ski field activities in the Rural Resource Area, and that this differs from the Queenstown Lakes District Plan which provides for the existing Remarkables ski area within a 'Ski Area Sub Zone' However, the proposal is an expansion of the existing Remarkables ski field into land immediately adjoining the existing ski field. Because it is an expansion, it can rely on all the existing infrastructure already established, including the access road which makes efficient use of these resources. Therefore, while I acknowledge the CODP does not anticipate this type of development, I do not consider it to be entirely inappropriate in this location, given it is an expansion of an existing ski field. I therefore consider the proposal to be inconsistent with, as opposed to contrary to these provisions.

Archaeology and Historic Heritage

32. New Zealand Heritage Properties (NZHP) (2026) have prepared a Heritage Assessment for the Project that includes an assessment of impacts on heritage values. CODC engaged Dr Chris Jennings of Origin Heritage to peer review the assessment and concluded that the NZHP assessment undertaken was exhaustive and did not identify any heritage/archaeological sites. This has led to the conclusion that Doolans Basin expansion site has low heritage values and note that the proposed works will have no impact on historic heritage.

33. While Dr Jennings does not dispute this conclusion, he considers that the survey should have included the sites for the Doolans Water Intake and Access and the western bank of Doolans Creek, which are part of the proposal site. Dr Jennings considers that this additional survey is required as there is a 'non-zero' chance for archaeological or heritage sites being present within the unsurveyed areas of the project site in the Doolans.

34. Based on the views of Dr Jennings, I consider it necessary for the applicant's heritage experts to undertake further field surveys of Doolans Water Intake and Access and the western bank of Doolans Creek, and to update the heritage

assessment to reflect the findings of this survey. If archaeological/ heritage sites are discovered as part of this survey, then the approach for managing the site(s) must be set out in the conditions. I have suggested changes to the General Conditions to address this (refer **Appendix A** to the CODC's s53 Comments).

Noise and Vibration Effects

35. Mr Styles, peer reviewing for CODC, agrees with the EMM Noise and Vibration Assessment report that the proposal can comply with the relevant Central Otago District Plan 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. I therefore consider that any actual or potential noise and vibration effects arising from the proposal will be acceptable.

Effects on Recreational Values

36. The recreation assessment as part of the substantive application identifies that the construction phase of the Doolans Basin Expansion will have very high but temporary adverse effects on the recreational environment. These effects will occur predominantly over three summer seasons, with some minor tidy-up works possible in a fourth summer. Effects arise from the extensive scale of works required to establish gondola infrastructure, buildings, ski trails, access roads, snowmaking facilities, and associated services. These activities will introduce noise, vehicle movements, helicopter activity, lighting, and visible construction activity within an otherwise undeveloped backcountry environment resulting in all summer recreation activities within the Doolans Basin expected to experience a very high level of temporary adverse effects.

37. Long term effects on recreational values associated with the operation of the ski field within Doolans Basin will result in enduring changes to the recreational environment of the Doolans Basin, with effects differing between recreation opportunities and recreation values. Operational effects on all winter activities are assessed as moderate reflecting the change in lift operated skiing activities which result in positive effects from increasing skiing opportunities for a large number of people via the expansion of the ski field, but which is a significant change to the

current ski touring activities enjoyed by approximately 5-100 people per day[16]. The Greenaway response to CODC comments states that the proposal will result in deeper access into the Remarkables Conservation Area for winter sports via its enhanced access provision, in the same way that the existing ski area currently facilitates access into Doolans Basin.

38. Operational effects on hunting and all summer activities are assessed as minor, due to the relatively low levels of summer use in the Basin and the availability of alternative locations regionally.

39. Overall, I agree with the conclusion in the substantive application's Assessment Environmental Effects that the proposal will significantly enhance recreation opportunities and accessibility for a larger number of people. It will provide a substantial increase in ski area for Queenstown and the wider area. However, it will also result in an unavoidable and permanent loss of backcountry recreation values for existing users of the Doolans Basin.[17] I consider these adverse effects are offset to some degree via the proposal providing access deeper into the adjoining areas of the Remarkables Conservation Area.

40. Mr Bailey, Council's Parks and Recreation Manager has reviewed the mitigation measures on behalf of CODC, which includes the establishment of a Recreational Users Group, which he supports. Mr Bailey has identified that other mitigation measures suggested have not been carried through into conditions. These include promoting of the one-up one-down ski pass (for ski touring, ice climbing etc), and a condition to ensure redundant equipment/structures are removed from the site area. A change to Condition RUG.02 is suggested (refer **Appendix A** of the s53 CODC Comments) to require the promotion of the one-up-one-down pass via the RUG, and an additional condition about removing redundant equipment is proposed.

[16] Based on estimates in the Recreation Assessment, B.07, page 21.
[17] Substantive application B.07 Recreation Assessment, section 6.13.2.

Natural Hazard Effects

41. Mr Cruden's peer review of the Natural Hazard assessments, management and mitigation measures conclude that 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. I therefore agree with the assessment of natural hazard effects undertaken in the substantive applications Assessment of Environmental Effects.[18]

42. Some relatively minor changes to the Conditions are suggested, which are set out in the Conditions Table, attached to the CODC Comments Report in **Appendix A**.

3 Waters

43. None of the three waters infrastructure will connect to Council services and are all proposed to be managed onsite. The wastewater will be piped and pumped across to the Rastus Burn side and connect with the existing wastewater system. Mr Steel and Mr Fourie's peer review of the water supply, wastewater and stormwater management for the Doolans side of the project site identified several questions regarding design matters which have been responded to by the applicant's experts. Based on Mr Steel and Mr Fourie's advice that issues raised have been adequately responded to and any further matters can be addressed during the detailed design phase of the development, I recommend a condition of consent requiring an engineering acceptance process for the 3 waters infrastructure (refer Conditions Table, attached to the CODC Comments Report in **Appendix A**).

Transportation Effects

44. CODC has not undertaken a review of the Transportation Effects Assessment for this proposal as the ski field is accessed from roads within the Queenstown Lakes District and not Central Otago District. I have not assessed transport matters for this application.

[18] Substantive application A.13 Assessment of Environmental Effects, section 6.10

Relevant Statutory Considerations

45. The substantive application includes a fulsome assessment of the relevant statutory provisions (Part A.16 Approvals relating to the Resource Management Act 1991). Where these are relevant to the CODC areas and matters of jurisdiction, I have undertaken a review of the applications assessment. The findings of the technical reports and the peer reviews of the technical report undertaken on behalf of CODC have informed this assessment.

46. The following National Direction, Policy Statements and Plans are considered relevant to the consideration of the substantive application (where relevant to CODC):
    a. National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB);
    b. National Policy Statement for Natural Hazards 2025 (NPS-NH);
    c. Operative Otago Regional Policy Statement 2021 (Operative RPS);
    d. Central Otago District Plan (CODP).

47. At the time the substantive application was lodged in May 2026 there was a proposed and operative Otago Regional Policy Statement, so the application correctly assessed the relevant provisions of both documents. The Proposed Otago Regional Policy Statement 2021 became operative on 9 July 2026. Therefore, there is now only one Regional Policy Statement in force. It is unclear if the substantive application has considered the final version of relevant policies in the now Operative Regional Policy Statement as the application does not include the full wording of the provisions assessed. Confirmation of this from the applicant is requested.

48. There are two iwi management plans that is applicable to the Project area - Kāi Tahu ki Otago Natural Resource Management Plan 2005and Ngāi Tahu ki Murihiku Natural Resources Plan. I do not provide comments on these documents as I understand that Te Rūnanga o Ngāi Tahu Te Rūnanga o Moeraki Kāti Huirapa Rūnaka ki Puketeraki Te Rūnanga o Ōtākou Hokonui Rūnanga Waihōpai Rūnaka Te Rūnanga o Awarua Te Rūnanga o Ōraka-Aparima have been invited to comment on the substantive application.

49. **Table A** attached as **Attachment 1** to this report provides my assessment on the key provisions of the NPS-IB and the CODP. This assessment only addresses key provisions or where my assessment differs from the conclusions reached in the substantive application.

50. In addition, based on the peer reviews of the Natural Hazards Assessment (B.15A) in the substantive application, I agree with the applicant that the proposal is consistent with the provisions of the NPS-NH.

Conclusion

51. Having considered the substantive application and supporting material, I consider that:
    a. Resource consent is required for numerous activities which make up the project in the Central Otago District. In addition to the list set out in the application, I consider resource consent is also required to cover the five transformers proposed in the Doolans Basin under Discretionary Rule 13.6.16. Overall resource consent is required for a **non-complying activity**.
    b. The Proposal is expected to meet the purpose of the Fast-track Approvals Act 2024 in so far as economic benefits are concerned and result in at least regionally significant economic benefits.
    c. 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, due to the undisturbed nature of this environment, and these effects cannot be further reduced.
    d. Effects on the landscape values of the Doolans Basin ONL are expected to be high (significant) and within the part of the Rastus Burn that is within the CODC jurisdiction, effects will be moderate.
    e. 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;

f. The proposal will result in several residual adverse effects on terrestrial ecology that cannot be avoided, remedied or mitigated, and therefore the application proposes to compensate for these effects;
g. The method for calculating ecological compensation for residual effects does not follow best practice (based on advice from Wildlands) and as proposed does not seek to result in a no net loss ecological outcome;
h. In my view, 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.
i. 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.
j. In terms of the now operative Otago Regional Policy Statement 2021, it is unclear if the final operative version of the relevant policies has been assessed in the substantive application.
k. In my view 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).

Attachment 1
Table 1: Key Statutory Considerations

National Policy Statement for Indigenous Biodiversity			
Provision	**Detail**	**Applicant Assessment**	**CODC Planning Comment**
Objective 1	(1) The objective of this National Policy Statement is: (a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and (b) To achieve this: (i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and (ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and	It is considered that the Project is generally consistent with the provisions of the NPS-IB. Although there is some tension in that the Project will result in terrestrial biodiversity effects (including on areas that meet the significance criteria in the NPS-IB) that cannot be avoided, remediated or mitigated, this is a largely unavoidable consequence of development in sensitive alpine environments. To address this, NZSki is proposing a number of compensatory measures to address residual effects, while enabling the social and economic effects of the Project to be realised. Such measures include the Biodiversity Compensation Project, funding of the boardwalk to Lake Alta and the establishment of a research fund for threatened at risk lizards within the	As discussed under Policy 7 below, the proposal will not achieve this objective as it the biodiversity compensation package proposed to address residual effects on biodiversity has not been shown to achieve a 'no overall loss of indigenous biodiversity' outcome.

	(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and (iv) while providing for the social, economic, and cultural wellbeing of people and communities now and into the future.	Remarkables and wider Hector Ranges, as described in Section 3 of the application documents.	
Policy 3	A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	The TEcIA has considered the actual and potential effects of the Project on terrestrial ecology values within the Project area. NZSki states that the Project area is a complex alpine environment and a precautionary approach has been taken– with the proposed conditions requiring delineation of the disturbance footprint, plant translocations, performance standards in respect of those translocations and ongoing monitoring requirements to ensure survival.	For the most part, this has been followed in the TEcIA. The notable exception to this is the levels of effect assessed for vegetation loss. As discussed in Section 4.5 of the Wildlands Peer Review, the use of the entire Ecological District as a baseline downplays the magnitude of effect from vegetation loss.
Policy 4	Indigenous biodiversity is managed to promote resilience to the effects of climate change.	To the extent practicable, the Project has considered the potential climate related impacts within the Project area and will improve long term resilience to variable weather patterns.	The applicant mentions that the project has considered potential climate-related impacts and will improve long-term resilience. Wildlands disagree with this; and states that consideration of climate change impacts on terrestrial ecology was not evident in any of the documents

			reviewed. There does not appear to be any consideration of future climate risks when assessing ecological effects and outlining the management approach for these effects. In addition, it is unlikely that the project will improve the long-term climate change resilience of the terrestrial ecological values on-site. Instead, the many negative ecological impacts described in the TEcIA mean that a reduction in long-term climate change resilience is likely.
Policy 7	SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	The application states that for the Doolans Basin Project area, the entire Project area is located within three significant natural areas. The application states that any adverse effects on an SNAs must be managed in accordance with the effects management hierarchy, with an applicant being required to demonstrate how offsetting or compensation is being applied (including how the applicant has complied with the principles of offsetting/compensation in the NPS-IB).	Policy 7 requires effects management to protect ecologically significant vegetation and fauna habitats. Wildlands consider that the applicant has accurately represented the relevant residual effects identified in Table 18 of the TEcIA, however the omissions from that table are also absent from the applicant's discussion of Policy 7 leading Wildlands to conclude that the list is not complete (see Table 1 of Wildlands peer review memo, **Appendix A** of the Section 53 CODC Comments). The applicant acknowledges that the proposed Doolans Basin expansion does not achieve stringent adherence to Policy 7. This is true, as it

		The applicant acknowledges that the design of the Biodiversity Compensation Package will partially address residual effects, and the principles of compensation will broadly be adhered to in the design of the Biodiversity Compensation Package. The applicant considers that this approach is appropriate under the FTAA.	has residual negative ecological effects, and does not demonstrate a net-gain or no-net-loss ecological outcome. While I acknowledge the effects management hierarchy pathway for considering specified infrastructure, which ski field infrastructure is defined as in the NPS-IB, in my view, the proposal does not achieve this policy because the biodiversity compensation package has not demonstrated that it will achieve a biodiversity outcome that could be considered as protection or managing adverse effects on the significant natural areas of the Doolans Basin via the Biodiversity Compensation Package.
Policy 10	There is improved information and regular monitoring of indigenous biodiversity.	The proposed conditions include the requirement for ongoing monitoring.	Corrections to the TEMP as set out in the Wildlands expert comments are required. Provided these amendments are made and the monitoring requirements in the TEMP are implemented, this policy is achieved.

Central Otago District Plan			
Objective 4.3.2	*Outstanding Natural Landscapes and Outstanding Natural Features, and Land in the Upper Manorburn/Lake Onslow Landscape Management Area* To protect the District's outstanding natural landscapes and outstanding natural features, and land in the Upper Manorburn/Lake Onslow Landscape Management Area (including landforms) from the adverse effects of inappropriate subdivision, use and development.	It is acknowledged that the Project components within the Central Otago District are new and will represent a substantial change to the character of the Doolans Basin which is unmodified, with high natural character and landscape values – and is an ONL in the CODP. The Landscape Effects Assessment identifies that the Project will have: • Moderate to high natural character effects, which cannot be entirely avoided; • A high level of landscape effects on the ONL, due to 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. However, this area	Mr Espie agrees with the Boffa Miskell assessment that the Proposal is discordant with Objective 4.3.2, 4.3.3 noting that, while the Doolans Basin is of high landscape and natural character value, it is not unique in the context of other basins within the Remarkables / Hector Mountains. Mr Espie also considers the proposal is discordant with Policies 4.4.1 and 4.4.2.[20] The applicant states that overall, the proposal aligns with the relevant objectives and policies of the CODP.[21] I do not agree with this conclusion. I partially accept the views of the landscape architect experts that the proposal will result in adverse effects on the Doolans Basin ONL that do not achieve the outcomes sought by Objective 4.3.2 and Policy 4.4.1 which seek that the values are protected. However, these provisions require
Objective 4.3.3	*Landscape and Amenity Values* To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment, and to maintain the open natural character of the hills and ranges.		

[20] Memo by Mr Espie entitled: Peer Review Memorandum Regarding Landscape and Visual Effects Assessment, dated 3 July 2025, paragraph 33
[21] A.16 Substantive Application Report Section 9 Approvals Relating to the Resource Management Act 1991, dated May 2026, section 9.3.18

Policy 4.4.1	*Outstanding Natural Landscapes and Outstanding Natural Features and Land in the Upper Manorburn/Lake Onslow Landscape Management Area* To recognise the District's outstanding natural landscapes and outstanding natural features and land in the Upper Manorburn/Lake Onslow Landscape Management Area which: a. Are unique to the district, region or New Zealand; or b. Are representative of a particular landform or land cover occurring in the Central Otago District or of the collective characteristics and features which give the District it's particular character; or c. Represent areas of cultural or historic significance in the district, region or New Zealand; or d. Contain visually or scientifically outstanding geological features; or	affected by landscape change is confined within a small part of the wider ONL; • Moderate to high visual effects from nearby ridgelines and within the upper basin where Project components will be visible in its immediate context; and To the extent possible, the Project has been designed to minimise landscape effects, but full avoidance of effects is not possible given the Project is seeking to introduce structures within an unmodified landscape. The Landscape Assessment concludes that, while the adverse landscape and character effects of the Project may be significant[19], these effects will be spatially and visually confined, with mitigation measures proposed to minimise both landscape and natural character effects.	that the ONL values are protected from 'inappropriate development'. I accept that the CODP does not provide for ski field activities in the Rural Resource Area, and that this differs from the Queenstown Lakes District Plan which provides for the existing Remarkables ski area within a 'Ski Area Sub Zone' However, the proposal is an expansion of the existing Remarkables ski field into land immediately adjoining the existing ski field. Because it is an expansion, it can rely on all the existing infrastructure already established, including the access road which makes efficient use of these resources. Therefore, while I acknowledge the CODP does not anticipate this type of development, I do not consider it to be entirely inappropriate in this location, given it is an expansion of an existing ski field. I therefore consider the proposal to be inconsistent with, as opposed to contrary to these provisions.

[19] High and Very High effects generally equate to 'significant' effects, refer Boffa Miskell Ltd: Remarkables Ski Area Upgrade & Doolans Basin Ski Expansion Landscape Effects Assessment, Appendix 1

	e. Have characteristics of cultural, historical and spiritual value that are significant to Kai Tahu ki Otago; f. Have high natural character values and high landscape quality that can be distinguished from the general landscapes of the Central Otago District and provide protection for them from inappropriate subdivision, use and development.	The Boffa Miskell August response memo provided more useful analysis of the provisions, concluding that effects on the ONL are discordant with Objectives 4.3.2.and 4.3.3. They note that these effects will be confined to the relatively-contained Doolans Basin, which is immediately adjacent to the Rastus Burn basin, which itself is modified by ski activity. Boffa Miskell August 2026 response memo provides the following comments in relation to Policy 4.4.1: The Doolans catchment contains landscape and natural character values that are of a high quality. However, these values are not particularly unique or noteworthy from a geomorphological, cultural, historic or other scientific perspective. While the nearby Lake Alta cirque is a Geopreservation site, the values found within the upper Doolans Creek Right Branch catchment are not particularly distinguishable from other parts of the ONL. While the Racemans Hut lower down in the catchment holds historic values, this does	
Policy 4.4.2	*Landscape and Amenity Values* To manage the effects of land use activities and subdivision to ensure that adverse effects on the open space, landscape, natural character and amenity values of the rural environment are avoided, remedied or mitigated through: a. The design and location of structures and works, particularly in respect of the open natural character of hills		

	and ranges, skylines, prominent places and natural features, b. Development which is compatible with the surrounding environment including the amenity values of adjoining properties, c. The ability to adequately dispose of effluent on site, d. Controlling the generation of noise in back country areas, e. The location of tree planting, particularly in respect of landscape values, natural features and ecological values, f. Controlling the spread of wilding trees. g. Encouraging the location and design of buildings to maintain the open natural character of hills and ranges without compromising the landscape and amenity values of prominent hillsides and terraces. h. n/a.	not extend into the project area. In this respect the Doolans Basin where the project is proposed is not particularly unique to the district/ region/ New Zealand. In relation to Policy 4.4.2, the Boffa Miskell August 2026 response memo outlines the measures undertaken to manage adverse effects on open space, landscape, natural character and amenity values of the rural environment, and acknowledges that adverse effects will occur.	

Objective 4.3.4	*Recreation Resources* To maintain and enhance the quality of the District's recreation resources and public access to those resources.	The application states that the Project will also enhance the recreational opportunities within this part of the district, and contribute substantially to the regional economy. Construction activities within the Doolans Basin will result in very high but temporary adverse effects on recreation during the construction period, primarily due to access restrictions, noise, visual change, and displacement of users; however, these effects are time-limited and will be managed through construction controls. During operation, the Project will result in a significant shift in the recreational character of the Doolans Basin, with a permanent loss of backcountry recreation values for some existing users, particularly backcountry winter ski users. However, recreation opportunities, including winter skiing, summer access, hunting, and mountaineering, will generally be retained,	I broadly agree with the applicant's assessment of Objective 4.3.4 and Policies 4.4.13 and 4.4.15, although I note that while recreational opportunities in the Doolans Basin will be permanently changed as a result of the proposal, public access will be enhanced. No assessment of Policy 4.4.14 has been undertaken by the applicant. I consider this policy, which manages effects of activities on back country amenity values, to be relevant to the proposal. Mr Espie considers the proposal to be discordant with this policy based on the proposals effects on natural character and landscape values[23]. I note that while it will change the recreational opportunities provided at the Doolans, it will continue to provide a range of recreational opportunities and will enhance access to areas deeper into the Remarkables Conservation Area. The proposal will also impact the natural quiet of the Doolans Basin during construction works and when operational. Overall,
Policy 4.4.13	*Public Access to Significant Features* To promote the provision of public access opportunities to the Districts significant natural and physical land features including areas of value for recreational purposes.		
Policy 4.4.14	*Back Country Amenity Values* To 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 4.4.15	*Conflict between Recreation Activities* To recognise and avoid, remedy or mitigate the potential conflict between different		

[23] Memo by Mr Espie entitled: Peer Review Memorandum Regarding Landscape and Visual Effects Assessment, dated 3 July 2025, paragraph 33

	types of recreation activities that occur within the District, whilst encouraging multiple use of public open space and recreation areas wherever this is possible and practicable.	and in many cases enhanced through improved access. The Project will increase recreational accessibility and capacity for a much larger number of skiers. The applicant states that Project is therefore consistent with the intent of Objective 4.3.4 and Policies 4.4.13 and 4.4.15.[22]	I consider the proposal to be inconsistent with this policy
Objective 4.3.8	*Significant Indigenous Vegetation and Habitats of Indigenous Fauna* To recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.	The applications states that, as has been described in respect of the NPS-IB there will be residual effects on the value of the significant natural areas that cannot be fully avoided, remedied or mitigated due to the functional and operational need of the ski infrastructure to be located in an alpine environment. However, the intent of the Biodiversity Compensation Package is designed to compensate for the loss of this vegetation, to the extent necessary for an application under the FTAA.	No conclusion is made by the applicant about compliance with Objective 4.3.8 and Policy 4,4,7. In accordance with the assessment of the NPS-IB, due to the identified residual adverse effects on biodiversity and the Biodiversity Compensation Package not achieving no net loss, it cannot be stated that the proposal will protect the SNAs in the Doolans Basin that will be impacted by the proposal. In my view, the proposal does not achieve the environmental outcomes sought by these provisions.
Policy 4.4.7	*Significant Indigenous Vegetation, Wetlands and Wildlife* To protect areas of: a. Significant indigenous vegetation,		

[22] A.16 Substantive Application Report Section 9 Approvals Relating to the Resource Management Act 1991, dated May 2026, section 9.3.18

	b. Significant habitats of indigenous fauna, c. Significant wetlands, d. Indigenous vegetation or habitats that support a significant indigenous fresh water fishery, and e. Habitats of statutorily managed sports fish and game. from the adverse effects of land use activities and subdivision and to promote and encourage, where practicable, the retention, enhancement and reinstatement of indigenous ecosystems within the District.		