

**OBJECTION OR SUBMISSION**

Department of  
Conservation  
*Te Papa Atawhai*  
New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Matthew Tyrrell
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	
Alternate contact for all DOC communication	
Phone/Mobile	
Postal Address and Post Code	



I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Matthew Tyrrell
Organisation	-
Date	20/12/22

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application to replace and extend the Shadow Basin chairlift

My reasons for my objection or submission are:

Expansion of the Remarkables Ski Area cannot go on indefinitely, when will the proposed expansion become 'not enough'? The Remarkables is a unique environment that is there for all the public to enjoy, not just ski enthusiasts, and any further expansion of the current infrastructure will not only have a detrimental effect on the look and feel of the valley, but have a devastating effect on the environment.

I would question whether expansion of this lift is the thin end of a wedge. More capacity = more visitors. They require parking (the Remarkables already struggles with this at present levels) - so more land will doubtless be required to satisfy this need. Followed by an expanded base building?

Growth is not always the best option when considering the needs of the community. Although growth will doubtless provide some extra employment over the winter months, it is at the expense of the community as a whole, with profits being exploited from our natural environment and placed in the hands of private business interests.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

There are no particular parts of this application that need to be addressed, it should be refused - our natural environment is not for exploitation by private business, DoC owns the land and is a trustee of it for everyone, not a small minority who ski, and certainly not for private business interests.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [DNSubmissions@doc.govt.nz](mailto:DNSubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Ōtepoti / Dunedin Service Centre, PO Level 1, John Wickliffe House, 265 Princes Street, Ōtepoti / Dunedin 9016. Attention: Kelvin Brown.

**OBJECTION OR SUBMISSION**

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*Te Papa Atawhai*  
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**A. Permission Application Number and Name of Applicant**

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**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Quentin Nolan
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	quentin@mountainwatch.com
Alternate contact for all DOC communication	
Phone/Mobile	027 222 7803
Postal Address and Post Code	11 Stewart St, Frankton Queenstown 9300

I wish to keep my contact details confidential

*Note: Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.*

# OBJECTION OR SUBMISSION



Department of  
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## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Quentin Nolan
Organisation	
Date	21/12/22

## D. Statement of Support, Neutrality or Opposition

- I Support this Application (I am making a submission)
- I am Neutral on this Application (I am making a submission).
- I Oppose this Application (I am making an objection).

## E. Hearing Request

- I Do Not wish to be heard in support of this objection or submission at a hearing.
- I Do wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My submission is in support of the application on the following basis. NZ ski has made a huge commitment to the local community, the existing chairlift is old & needs to be replaced & NZ ski has a track record of operating responsibly on public conservation land.

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

## G. Attachments

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**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

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**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)

DUNCAN FEA

Contact person and role of organisation

AVA

Email

(Communication from DOC will be via email unless alternate contact requested)

duncan.fea@findex.co.nz

Alternate contact for all DOC communication

0274382223 OR Box 651, Queenstown 9348

Phone/Mobile

0274382223

Postal Address and Post Code

PO Box 651, Queenstown 9348

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location(s)**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.2 Your name**

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Printed name of submitter or person authorised  
on behalf of submitter

DUNCAN FEAT

Organisation

N/A

Date

21 December 2022

**D. Statement of Support, Neutrality or Opposition**

- I Support this Application (I am making a submission)
- I am Neutral on this Application (I am making a submission).
- I Oppose this Application (I am making an objection).

**E. Hearing Request**

- I Do Not wish to be heard in support of this objection or submission at a hearing.
- I Do wish to be heard in support of this objection or submission at a hearing



**F. Objection or submission**

The specific parts of the application that this objection or submission relates to are:

*NZSki as The Kennedies has made a huge contribution to the local community through the provision of recreational opportunities including safe access to the mountains and ongoing conservation activities in Raiters Burn and beyond*

My reasons for my objection or submission are:

*The existing 37 year old, 4-seater chairlift needs to be replaced as NZSki can meet the very latest health & safety and customer service standards*

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

*Supporting NZSki and this application is important to me because NZSki has more than 20 years experience and proof that it's able to operate responsibly on public conservation land and contribute to community wellbeing, positive conservation outcomes and the economy  
I implore this application be approved*



*Janice Lee*

**G. Attachments**

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### C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)

James (Jim) Boulton

Contact person and role of organisation

Self

Email

jim@boulton.co.nz

(Communication from DOC will be via email unless alternate contact requested)

Alternate contact for all DOC communication

Phone/Mobile

+64 274 801 201

Postal Address and Post Code

687 Lake Hayes/Arrow Junction Highway, RD1, Lake Hayes, Queenstown, 9371

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Jim Boulton
Organisation	Individual
Date	December 21 <sup>st</sup> 2022

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The entire application

My reasons for my objection or submission are:

I have been involved in tourism locally and nationally for over 40 years. I am a former CEO, director and Chair of a number of very large tourism businesses. In addition, I am a former deputy chair of Tourism NZ and director of TIA. For 6 years until October 2022, I was mayor of New Zealand's principal tourism destination, Queenstown Lakes. I consider myself therefore to be very knowledgeable on tourism matters.

This application seeks to update an important part of Queenstown's tourism infrastructure which has existed since the 1980's. Pre Covid, tourism was NZ's largest foreign exchange earner and by number, the largest source of employment in Aotearoa. While Covid impacted that for a period, the industry is well on it's way to recovery.

The importance of the tourism industry cannot be overstated, and this application seeks to invest a significant sum in replacement infrastructure. Ongoing investment like this is vital to the recovery and viability of the industry. I am therefore delighted to see NZSki undertaking this initiative in the current economic environment.

The ski industry is the one sector of the tourism industry which has continued to enjoy reasonable trading through Covid, and its importance in terms of resilience is obvious.

NZ Ski is one of a handful of very significant businesses in the industry and has made a very large contribution to NZ and locally here. NZ inc needs to support initiatives such as this.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Approval of the application in its entirety.

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## G. Attachments

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**OBJECTION OR SUBMISSION**

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**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

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**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Tom Elworthy
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	
Alternate contact for all DOC communication	
Phone/Mobile	
Postal Address and Post Code	

I wish to **keep my contact details confidential**

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## C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Tom Elworthy
Organisation	Individual
Date	23.12.2022

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support the application to replace this aging lift which is a critical part of the ski resort. I note the proposed line is only slightly different to the current one and the effects will be very minor.

My reasons for my objection or submission are:

The Remarkables ski area is an increasingly popular visitor attraction in the region and NZSKI have invested heavily in improving facilities which allow greater access to the mountains (incl Rastusburn recreational area) and provide for growing participation in outdoor activity. The existing lift is 37 years old and overdue for replacement. NZSKI has a track record of delivering projects such as this in a professional manner with positive conservation and economic outcomes

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Approval in full of the application as proposed.

## G. Attachments

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**OBJECTION OR SUBMISSION**

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100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Novotel Queenstown Lakeside
Contact person and role of organisation	Jim Moore - General Manager
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	[REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to keep my contact details confidential

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## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Jim Moore
Organisation	Novotel Queenstown Lakeside
Date	23 December 2022

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

General

My reasons for my objection or submission are:

I support the application based on the fact that the Ski Industry is an integral part of the tourism offering for the region and as such needs to be delivering an experience that meets the expectations and needs of those that come here. The current chairlift does not meet the experience level of the other facilities and as such is past it's use by date. By bringing this up to date the experience will be greatly improved.

The current skiable terrain is very good however by offering more area the experience will be better and will better handle the numbers of skiers better without further impacting on the local environment.

NZ Ski have demonstrated that they are professional operators that value the guest experience and the reputation of Queenstown.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Happy with the application

## G. Attachments

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**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

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Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Garreth Hayman
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	
Alternate contact for all DOC communication	
Phone/Mobile	
Postal Address and Post Code	

I wish to keep my contact details confidential

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## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Complete application, No changes required, the application should be approved

My reasons for my objection or submission are:

I am making a submission of support, as NZSki has more than 20 years experience, and have proved that they are able to operate responsibly on public conservation land achieving positive conservation outcomes, and provides a large contribution to community wellbeing and the economy

The Remarkables and NZSki make a significant contribution to the region, providing safe access to the mountains, and on going conservation activities in the Rastus Burn and Beyond. The existing chairlift needs to be replaced to meet todays standards.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

No changes required, the application should be approved

## G. Attachments

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**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Brad Rowe
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	bradley.a.rowe@gmail.com
Alternate contact for all DOC communication	
Phone/Mobile	021 323 937
Postal Address and Post Code	27A Ferry Hill Drive, Lower Shotover, Queenstown

I wish to **keep my contact details confidential**

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## A. Permission Application Number and Name of Applicant

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## B. Name of Proposed Activity and Location(s)

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Printed name of submitter or person authorised on behalf of submitter	Brad Rowe
Organisation	
Date	12/01/2023

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing



## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Lease, licence and easement to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure within the Rastus Burn Recreation Reserve.

My reasons for my objection or submission are:

I support this submission because:

1. NZSki and The Remarkables has made a huge contribution to the local community through the provision of recreational opportunities including; safe access to the mountains and ongoing conservation activities in the Rastus Burn and beyond.
2. The existing 37-year-old, 4-seater chairlift needs to be replaced so NZSki can meet the very latest health & safety and customer service standards.
3. Supporting NZSki and this application is important to me because NZSki has more than 20 years experience and proof that it is able to operate responsibly on public conservation land and contribute to community wellbeing, positive conservation outcomes and the economy.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

[Empty text box for providing details of outcomes to be addressed]

## G. Attachments

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# OBJECTION OR SUBMISSION



Department of Conservation  
Te Papa Atawhai  
New Zealand Government

## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

### C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Felicity Hayman
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	
Alternate contact for all DOC communication	
Phone/Mobile	
Postal Address and Post Code	

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



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Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Complete application, no changes required, the application should be approved

My reasons for my objection or submission are:

I am making a submission of support, as NZSki has more than 20 years experience, and have proved that they are able to operate responsibly on public conservation land achieving positive conservation outcomes, and provides a large contribution to community wellbeing and the economy

The Remarkables and NZSki make a significant contribution to the region, providing safe access to the mountains, and on going conservation activities in the Rastus Burn and Beyond. The existing chairlift needs to be replaced to meet todays safety standards.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

No changes required, the application should be approved

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## G. Attachments

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**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Charlie North
Contact person and role of organisation	Charlie North
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	NA
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to **keep my contact details confidential**

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100472-OTH: NZSki Limited

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Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

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Printed name of submitter or person authorised on behalf of submitter	Charlie North
Organisation	Not applicable
Date	15 Jan 2023

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
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The Remarkables and NZSki make a significant contribution to the region, providing safe access to the mountains, and on going conservation activities in the Rastus Burn and Beyond. The existing chairlift needs to be replaced to meet todays safety standards.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

No changes required, the application should be approved

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**OBJECTION OR SUBMISSION**

Department of  
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**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	LUKE SANDERSON
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	lukesanderson1@gmail.com
Alternate contact for all DOC communication	
Phone/Mobile	+64 27 413 0224
Postal Address and Post Code	12 RUTHERFORD ROAD, RD 1, QUEENSTOWN, 9371

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.





## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

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## C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	LUKE SANDERSON
Organisation	
Date	16 JANUARY 2023

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I strongly support the replacement of the current fixed grip quad chairlift in Shadow Basin with a high-speed six-seater chairlift at The Remarkables Ski Area.

My reasons for my objection or submission are:

As a Queenstown local, and someone who has skied on The Remarkables since 2003, I am in strong support of this proposal to install a six-seater chairlift in Shadow Basin, for the following reasons:  
1. The current chairlift was installed in 1985, and the drive station of the current quad chairlift was built with consideration to the location of the former base building. The drive station relative to the current base area poses a number of issues, as it requires an awkward uphill walk and set of stairs to access. The new chairlift and landscaping around the bottom station of the new chairlift would address this problem.  
2. The current chairlift also has a mid station (at Towers 7 & 8) which is in a high traffic location, has not been used for many decades, and removing this would ease congestion for skiers on the Calypso trail (the main groomed trail in Shadow Basin).  
3. The return station of the current chairlift sits at 1943m. A significant amount of terrain (including Alta Chutes and East Face) is currently only accessible through a 10-minute hike. The new chairlift would finish at a higher altitude, simplifying access to some of the most iconic ski terrain in the Southern Lakes region.  
4. The speed of the current chairlift is approximately 2.1m/s. I would expect the speed of the new chairlift to be comparable to the existing two detachable chairlifts at The Remarkables (which operate at 4.2m/s). Further, the current lift must be slowed to 1m/s for the embarkation and disembarkation of foot passengers, which results in a very slow ride up during sightseeing hours, having a detrimental impact on skiers and snowboarders. The new lift will also be able to transport 2,400 passengers per hour (versus 1,500 on the current lift). This will help reduce lift queues.  
5. From an environmental perspective, NZSki invest an enormous amount of time and resources into working with DOC, to ensure that environmental impact is mitigated. NZSki's partnership with Queenstown's Kea Conservation Trust, their pest control program, waste reduction measures at food outlets, restoration and revegetation programmes demonstrate NZSki's commitment to the environment. NZSki have been able to achieve this alongside significant developments on this ski area including the sealing of the access road, redevelopment of the base area and installation of two other high-speed six seater chairlifts.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I declare my full support for this proposal, and would encourage DOC to ensure that this application is approved as soon as possible. I would be extremely disappointed if this project was not able to be completed in time for the 2024 winter season. The delays associated with the approval of the Sugar Bowl chairlift replacement in 2018 and 2019 had a detrimental impact on skiers, and I do not want to see this repeated. The uncertainty facing Whakapapa and Turoa Ski Areas is likely to see a huge spike in North Island skiers to Queenstown. Further, the opening of the borders to overseas skiers has also resulted in a massive influx in visitors to Queenstown. It is absolutely imperative that ski field infrastructure is able to cope with this forecasted increase in visitor numbers.

## G. Attachments

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# OBJECTION OR SUBMISSION



Department of  
Conservation  
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### C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Ross Copland
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	
Alternate contact for all DOC communication	
Phone/Mobile	
Postal Address and Post Code	

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



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100472-OTH: NZSki Limited

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## C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Ross Copland   BE(Civil), BCom, MBA
Organisation	
Date	17 January 2023

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

- Support for the case to replace the Shadow Basin chairlift.
- Discussion on requirement to undertake earthworks and snowmaking, irrespective of replacement option selected.
- Support for the suitability of the new alignment selected.
- Discussion on the effects of constructing a new chairlift in the Rastusburn Recreation Reserve and support for the proposed methodology and mitigation of the likely effects.
- Support for restoration of the modified stream bed back to its original RL.
- Support for relocation of the lift loading area adjacent to the base building and cut to fill of est.10,500m3 of earth for this purpose, reinstating the original ground level prior to construction of the original lift.
- Support for construction of a building for storage and maintenance of the lift chairs when not in use.
- Support for excavation and backfilling of a services trench along the alignment of the lift.
- Support for the need for control rooms and proposed colours for them and the lift stations and towers.

My reasons for my objection or submission are:

- The proposed Activity, works and Structures could not be undertaken elsewhere and are not inconsistent with any matters for consideration set out in Section 17 of the Conservation Act, and are consistent with the Otago CMS which states a preference for development of existing ski fields over development of new ski areas.
- Skiing is a popular recreational activity in New Zealand, particularly for children and families, many of whom have few opportunities to access New Zealand's rugged, high-risk alpine environment outside of the comparative safety of our commercial ski areas. Fostering the renewal and upgrade of infrastructure at these ski areas is of the utmost importance to our national wellbeing, and a key mechanism by which we can encourage more NZ'ers into our great outdoors. NZ has the third highest rate of obesity in the OECD - alpine recreation is part of the solution.
- The applicant, NZSKI, has a track record of excellence in the development of alpine infrastructure. Together with their specialist contractors, consultants and the local DOC team, they have worked collaboratively to pioneer many successful techniques for low impact earthworks, re-vegetation, soil conservation, waste and biodiversity management.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

See attached submission document.

## G. Attachments

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Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
Remarkables Shadow Basin Submission Ross Copland	PDF	Provides detail in support of this submission.

### How do I submit my objection or submission?

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# Shadow Basin Lift Renewal Submission

Ross Copland | BE (Civil), BCom, MBA

## About the submitter

I have 7 years experience working in New Zealand's largest commercial ski areas including development of infrastructure with a significant focus on sustainability and conservation in both Queenstown and the Central North Island.

During my four years as Ski Area Manager at Coronet Peak Ski Area I was involved with the renewal of snowmaking, new trail development, night skiing infrastructure, and major chairlift maintenance and operations. Over the following 3 years as Chief Executive at Ruapehu Alpine Lifts (operator of Whakapapa and Turoa Ski Areas) I led the development of new chairlifts, surface lifts, a large Gondola and various supporting infrastructure developments including a major snowmaking and night skiing upgrade.

Immediately after my time with Ruapehu I returned to Queenstown to lead the development of the Remarkables Gondola as Chief Executive of Remarkables Park Limited, a significant property owner and developer in Auckland and Queenstown. This project required close collaboration with the applicant NZSKI Limited, the local Department of Conservation management and staff, and allowed me to develop a more detailed understanding of the site-specific challenges, constraints, unique biodiversity and wetland areas, landscapes and natural values of the Rastus Burn Recreation Reserve and Remarkables Ski Area which operates within it. I have a working knowledge of the Queenstown Lakes District Plan, including the Ski Area Subzone that applies.

**No conflict of interest:** I am making this submission in my personal capacity, and I have received no benefit, either monetary or non-monetary from the applicant, nor any other offer of incentive or reward of any kind which may compromise my independent opinion on this application. I have no employment or business relationship of any kind with the applicant.

I am currently employed as Chief Executive of the New Zealand Infrastructure Commission but this submission is not related to, or endorsed by the New Zealand Infrastructure Commission in any way.

## Submission

I have a strong interest in The Remarkables Ski Area and its ongoing development and renewal having learned to ski there in the late 1980's. My children have also learned to ski at Coronet Peak and the Remarkables. Skiing has become an important activity for our family and a great way to access the mountains quickly and safely. NZSKI is one of a handful of commercial operators that has continued to invest in renewing its assets over the past two decades ensuring enhanced safety and improved quality of experience for visitors. It has however, become increasingly difficult for concessionaires to develop and renew infrastructure on conservation land so I felt it was important to write and outline why I believe the Department of Conservation should have confidence granting approval for this application.

I have reviewed the application to remove the end-of-life Shadow Basin Chairlift and replace it with a new Chairlift on a modified alignment with associated trail works, snowmaking, building structures and earthworks.

- I support for the proposal to replace the Shadow Basin chairlift because;

- The Remarkables Ski Area represents a small % of the Rastus Burn Recreation Reserve which represents a tiny % of the Remarkables Conservation Area which represents a tiny % of alpine conservation land in New Zealand. And Shadow Basin reflects a small percentage of the Ski Area itself. And The Remarkables Ski Area has been set aside for the express purpose of providing alpine recreation. Thus, this is exactly the right location to build ski area infrastructure irrespective of the temporary effects associated with construction and terrain modification.
- Additional capacity is required to meet strong population growth in the region combined with continued domestic and international visitor growth to the Queenstown region.
- Shadow basin is high quality skiing terrain and provides access to one of the most iconic views in New Zealand – the view to the northwest from “the lookout” over the front face of the Remarkables range. The lift will also provide access to some of New Zealand’s best freeride terrain where New Zealand athletes are now achieving success on the world stage and can only continue to do so with lift access to appropriate terrain which this proposal provides.
- The new lift will have the following benefits compared to the existing lift:
  - **enhanced safety** by providing a considerably faster journey (which reduces duration of exposure to heights and the elements), multiple system redundancies, the ability to store chair’s under cover out of harmful UV light which degrades plastics and fabrics quickly and reduces the risk of corrosion to critical components), the use of multi-pole electrical drives and evacuation drive motors which can evacuate the lift line without requiring static line evacuation procedures which are higher risk, the ability to recover from a collapsed bullwheel bearing, and the benefit of reduced ice formation during rime-ice forming climatic conditions which can increase the effective rope diameter and reduce grip-rope friction. New lifts also feature far lower loading and unloading speeds reducing one of the highest risk areas by allowing the chair to detach from the haul rope and move at a much lower speed than a ‘fixed grip’ design like the existing Shadow Basin chairlift.
  - **higher capacity**, reducing queue times and better matching the capacity of the terrain with the capacity of the lift reducing the potential demand for another lift to be added in future.
  - **significant environmental benefits** by having nearly one third fewer intermediate tower structures (requiring disturbance of 5 fewer sites along the lift line) and lower visual impact/prominence, far greater energy efficiency, an oil-free drive motor reducing the risk of spills at the drive station, the potential for regenerative braking systems, and an alignment which is further away from significant wetlands in Shadow Basin compared with the existing lift. The proposal to reinstate the original RL at the loading area is a significant restoration effort that not only enhances the accessibility of the lift for less able-bodied skiers (including paralysed skiers using a sit-ski), but also restores the natural contour at the toe of this prominent slope adjacent to the new base building. There are also significant environmental benefits associated with snowmaking in Shadow Basin which can’t be overlooked as climate change continues to reduce the natural snow-pack depth over time. The benefit of storing water in the form

of 'snow' in the Shadow Basin will be increasingly significant in the mid-summer months when snowmelt continues to replenish the various tarns, wetlands and streams that flow from this catchment, in turn helping to reduce water temperatures and maintain a survivable environment for invertebrates and biodiversity that relies on continued water supply and low water temperatures. In parts of the US and Europe snowmaking is now actively encouraged given the beneficial attributes of offsetting reduced snowpack depths due to climate change and this is one of the co-benefits of supporting winter tourism in alpine areas like the Remarkables.

- All scenarios involve significant earthworks and site disturbance
  - o Whether like-for-like replacement, or a new lift on a new alignment (as proposed), significant earthworks will be required.
  - o There is no option that involves no earthworks, even permanent removal and non-replacement of the lift will require significant earthworks to remove the existing structures.
  - o When evaluating this proposal decision makers should reflect on the fact that there is no 'do nothing' case available given the age of the existing lift and the need to increase capacity, while noting the considerable benefits associated with the new lift on the proposed alignment.
- I support the new alignment selected.
  - o The alignment has placed the top station well below the skyline avoiding the potential visual impact on the skyline.
  - o The alignment avoids significant wetlands in the basin.
  - o The alignment and lift design allows 5 fewer towers than the existing lift reducing impact on the environment by reducing site disturbance and earthworks.
  - o The location of the bottom station improves access for those of lower ability including disabled athletes, children and senior skiers. It also provides the opportunity to restore part of the surrounding terrain to its natural contour by removing 10,500m<sup>3</sup> of imported fill material.
  - o Avoiding prominent ridges reduces the wind speeds the lift line and skiers will be exposed to while still providing access to the basin and chutes.
  - o The alignment makes good use of existing trail development work mitigating the need for additional trail development work.
  - o Increased vertical elevation will have the effect of spreading skiers over a greater area of terrain ensuring that the additional lift capacity safely and enjoyably accommodates the additional number of users.
- Discussion on the effects of constructing a new chairlift in the Rastus Burn Recreation Reserve and support for the proposed methodology and mitigation of the likely effects.
  - o NZSKI and DOC staff have spent several decades developing and refining what is now referred to as the Protocol for the Rehabilitation of Natural Alpine Environments following Ski Area Development (PRNAE). During my tenure at Coronet Peak I had first-hand experience working under an earlier iteration of this protocol and saw the incredible results that were able to be achieved with often surgical-like earthworks techniques as opposed to traditional bulk excavation methodologies. We achieved very high survival of transplanted species and excellent soil retention and restoration which provided an enhanced opportunity for self-seeding of delicate alpine species such as *Dracophyllum*. I also had the opportunity to observe infrastructure developments at The Remarkables including



the installation of the permanent snowmaking water pipeline from Lake Alta which remains one of the finest examples of surgical-quality excavation in a highly sensitive alpine environment that I'm aware of and was championed by the Ski Area Manager who took and continues to take an active interest in biodiversity and restoration of the Ski Area.

- NZSKI/DOC's PRNAE represents New Zealand industry best practice for earthworks, soil and vegetation management. In my day to day work I am yet to come across a more rigorous, risk weighted approach to managing bulk earthworks and terrain modification in highly sensitive alpine environments.
- NZSKI has built up a very experienced group of contractors and suppliers who understand and buy into the vision they have for soil and biodiversity conservation who have robust training and oversight procedures to ensure batters are appropriately shaped, plants removed for transplanting are well cared for, soil is appropriately conserved, and any new surprises or learnings are captured for future reference.
- Support for restoration of the modified stream bed back to its original RL.
  - The proposal to restore the modified stream bed to its original RL demonstrates commitment to restoring the natural environment where practical.
- Support for relocation of the lift loading area adjacent to the base building and cut to fill of est.10,500m<sup>3</sup> of earth for this purpose, reinstating the original ground level prior to construction of the original lift.
  - There are many benefits to accessibility, proximity and convenience and safety for users associated with this design. It is also a good opportunity to restore the natural contour and re-establish vegetation in this location.
- Support for construction of a building for storage and maintenance of the lift chairs when not in use.
  - There are considerable safety and durability benefits associated with having the opportunity to remove chairs from the lift line.
  - NZ has intense UV light which breaks down fabrics, plastics, seals, bearings and paint systems on the chair and grip components. Storing the chairs indoors significantly reduces the impact of UV light.
  - Reduced exposure to rain and mist reduces the potential for corrosion. Reduced exposure to wind loads also reduces fatigue loads on metal components and wear on the rope.
  - During rime-ice conditions during winter, there is considerable safety benefit in being able to operate the line overnight free of chairs. It prevents the accumulation of ice on the rope and sheaves (reducing the risk to staff de-icing the line and to customers skiing under the line) while also improving the connection between the grip and the rope increasing grip-pull tension and therefore safety. The limited visual impact and modest earthworks associated with a structure in this location are well justified by the benefits this building will provide.
- Support for excavation and backfilling of a services trench along the alignment of the lift.
  - New Zealand's unique climatic conditions mean our comms cables must be located underground. This is standard practice across all commercial ski area's I have experience with.
  - Previous experience suggests that vegetation along small trenches like this re-establishes very quickly and successfully. The smaller machine proposed for the digging of this trench will have lower ground pressure too.

- Support for the need for control rooms and proposed colours for them and the lift stations and towers.
  - o Control rooms are essential infrastructure for the lifts and the colour palette selected is recessive and consistent with other assets on the ski areas.

## Snowmaking and Trail Development Context

1998 was a watershed year in New Zealand for snowmaking - it was a disastrous ski season for Queenstown with just a few weeks of operation at Coronet Peak triggering significant investment in a new technology for making snow. The impacts on the wider community and businesses were severe and it was acknowledged a viable long term business model required the enhanced reliability that snowmaking would provide.

Since that time, Coronet Peak has been a pioneer in snowmaking technology adoption in New Zealand with massive improvements in energy, air and water efficiency – learning that was progressively transferred to The Remarkables where a state-of-the-art system has been developed over time as well. While significantly higher, Shadow Basin and the Remarkables will also benefit significantly from improved reliability, wider and safer trails and more consistent snow quality through increased investment in snow making.

It is important to note that snowmaking does not ‘consume’ water – it simply stores it in the form of snow which is released gradually over the spring and early summer months offsetting the reduced rainfall that occurs during summer. Snow forms an important part of the alpine hydrological cycle and buffers the cyclical, seasonal differences in rainfall and snowfall.

There are very few commercial ski areas globally that operate without snowmaking and none in New Zealand – it is as important as the chairlifts themselves and must be seen as a ‘package’ of investment.

The final point to note here relates to the benefits of earthworks and trail development – as the surface roughness, gradient and pitch of the slope is reduced, far less snow is required at the start of a season to make it safe for skiers. The permanent shaping of a 30m wide piste provides a significant annual energy saving through reducing water pumping and fan power requirements associated with making snow. There are also significant safety benefits which analysis of ACC data over the years has shown – well designed piste has vastly lower injury rates from skier/boarder falls than off-piste or poorly developed piste due to earthworks constraints or barriers which restrict the ability to correctly shape the fall-line and trail. The proposed 30m piste is not excessive, but represents a good standard width that reflects the significance of the indigenous biodiversity (minimising the area disturbed) while balancing the necessary width for a skier to make safe turns and come to a stop if required. In my view, the applicant has struck a good balance between keeping most of the basin unmodified and untouched, and providing a workable area of piste for safe skier and boarder descent. Decision makers should note that the applicant could have sought a far wider or more extensive network of trails and features in their proposal than they have.

## Otago CMS reflections with regard to the Proposal

The Otago CMS pp154 states:

- **Commercial ski fields typically require considerable infrastructure and terrain modification.**
  - o It is clearly foreseen in the CMS that terrain modification is a necessary part of ski area development.

- The Proposal outlines relatively modest terrain modification (area disturbed and volumes of cut/fill) in the context of the Ski Area subzone and relative of infrastructure developments of similar scale. It is also supported by a very robust approach to recovery and transplanting of the natural vegetation present which represents best practice and demonstrates consistency with the values set out in the CMS.
- 3.25.1 *May allow further development of existing authorised ski fields, where their natural values are already modified, in preference to the development of new ski fields.*
  - The Remarkables is a well developed ski area. It benefits from very low visibility from any proximate vantage point making its infrastructure almost invisible to those looking from even the most prominent locations such as the Crown Terrace.
  - It is thus entirely consistent with the CMS that renewal of existing assets would be supported, particularly in Shadow Basin given the historical modification and infrastructure development that has been undertaken. The restorative elements of NZSKI's proposal also support the intent of the Otago CMS and show a willingness to go well beyond the 'do minimum' that may have been typical when the original lift was installed.
- 3.25.2 *Should in considering the development of new and existing authorised ski fields apply a precautionary approach to the approval of new structures, accommodation facilities and terrain modification and consider both the likely effects of water use (for snow-making), the likely longevity of the field in the face of climate change, and any appropriate land remediation and facility removal costs should the ski field cease to operate.*
  - In making their assessment, DOC must note that there is very limited climate-related risk to the technical or commercial viability of the ski area over the life of the proposed asset. This can be readily ruled-out as a matter for consideration given relatively recent analysis of the impacts of climate change on snowpack and accumulations that indicates Shadow Basin is likely to retain skiable levels of snow cover well beyond the life of these assets.
  - Water use for the purpose of snow-making has potentially significant benefits now, but is likely to have tremendous benefits over time as the impacts of climate change increase the variability of summer rainfall increasing the importance of snow-pack stored water. It is also useful to note that snow-making does not 'consume' water in the same way as a potable water network for example. It merely changes the water phase from liquid to solid allowing for seasonal storage in the form of snow replicating the natural accumulation of snow which may have previously occurred.
  - It must also be noted that one of the impacts of climate change is actually increased snow accumulation (total precipitation) in some winters and that in those years the snowmaking system will remain idle drawing no water or electricity.
  - On balance, the matters of consideration in section 3.25.2 provide no basis for declining or requesting modifications to the applicants proposal.
- Page 43 of CMS: Otago's landscapes and wildlife are important to New Zealand's domestic and international tourism. Tourism concessionaires provide opportunities such as guided walking/cycling, skiing, angling, four-wheel driving, helicopter access to public conservation lands and waters and wildlife viewing. Many tourism concessionaires already contribute to conservation via sponsorships, donations, staff involvement in projects and raising awareness of the value of conservation through their tours.
  - The management team at The Remarkables have shown a particular passion for and commitment to sustainability and best practice. They were the first commercial ski

area to ban smoking in New Zealand, have championed recycling and waste recovery and have worked closely with DOC to develop the shared protocol for undertaking ski area development in a sensitive way through their once-in-a-generation renewal of the ski area buildings and supporting infrastructure. They went to some considerable lengths to provide public transport at their own cost during the summer construction of the new base building facilities and have continued to offer tens of thousands of discounted lessons and passes annually to children and families across the Whakatipu and wider Murihiku region. The team has also demonstrated a willingness to respond to constructive criticism and continue lifting its own development standards when required.

- The track record of the team and their network of suppliers should provide decisionmakers with confidence that this proposal will be executed in accordance with the documents supplied.

## Conservation Act reflections with regard to the Proposal

Section 17 sets out a number of questions and criteria that need to be addressed by the proposal including whether the activity could be reasonably located elsewhere, whether the addition is necessary, whether the requested lease/easement/concession is appropriate and so on. In each case it appears that this application satisfies the criteria as described in the application and supporting documents. There appears to be little, if any, basis for this application to be declined provided it is carried out in accordance with the methodology proposed by the applicant.

## Duration of the Concession – 40 years

It has often been my experience that members of the public query the required length of the concession – in my view 40 years is the absolute minimum necessary to make an investment of this magnitude for a business that operates with the inherent business risks all ski areas are subject to and under the complex, costly and active-landlord style of operating model the Department of Conservation has established for concessionaires in New Zealand.

Certainty of tenure is a critical requirement for any lessee or concessionaire and the Applicant is no different. This concession will require significant fees to be paid to the Department of Conservation and will require the applicant to incur tens of millions of dollars of capital and operating costs over the life of the assets. I encourage decision makers to grant the Applicant the full 40 year concession term they have sought noting their excellent track record as an operator and commitment to continued reinvestment and relationship with the Whakatipu community over the life of the ski area so far from Mt Cook Group to NZSKI – The Remarkables continues to be a well-managed, well-governed Ski Area that represents an excellent example of proactive asset management and operational best practice.

## Conclusion

This is a high quality application with carefully considered impact analysis and appropriate avoidance, mitigation and offsetting of effects where they exist. It does not pretend to have nil effects, but makes a compelling case for why the effects and mitigations proposed are appropriate in the context. This is a development which brings significant co-benefits to the community, the Ski

Area and the accessibility of the Rastus Burn Recreation Reserve to a range of users by an Applicant who has demonstrated a commitment to best practice and a willingness to champion sustainability leadership for over a decade.

Decision makers should have confidence in approving this application as proposed and continue to work closely with the applicant to ensure it is implemented as documented.



Ross Copland, 17 July 2023



**OBJECTION OR SUBMISSION**

Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Benje Patterson Ltd
Contact person and role of organisation	Benje Patterson, Economist
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Benje Patterson
Organisation	Benje Patterson Ltd
Date	20/01/22

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

This submission supports the assertions made on pages 27 and 30 of section 6 of the "Shadow Basin Application Form (includes Appendix A and B)" that the Remarkables, in conjunction with other ski fields in Queenstown-Lakes District offer valued "recreational and tourism opportunities".

My reasons for my objection or submission are:

In 2021, I (Benje Patterson) was commissioned by NZSki and Real NZ to assess the contribution of skiing to the Queenstown-Lakes economy. Analysis was based around the four major ski areas operated by these entities – Cardrona, Coronet Peak, The Remarkables, and Treble Cone. Key findings of my research across the four ski areas was:

### Tourism-related findings:

- Skiing holidaymakers in Queenstown-Lakes during the 2019 ski season spent an estimated \$430.9 million.
- The GDP generated by skiing holidaymakers was equivalent to 14% of Queenstown-Lakes' entire tourism industry.
- As many as 7,362 filled jobs could have been supported by skiing holidaymakers' spending in Queenstown-Lakes during the 2019 ski season.
- The ski fields themselves accounted for 1,777 of these jobs in 2019, which implies that there were 5,585 off-mountain jobs supported by skiing holidaymakers over the winter months.

### Recreation-related findings:

- Skiing and other recreational pursuits are an integral part of Queenstown-Lakes residents' lives.
- There were approximately 3.5 skier days per Queenstown-Lakes resident in the 2020 ski season, compared to just 0.2 skier days per person across all of New Zealand during the 2020 ski season.
- Queenstown Lakes District Council's Quality of Life Survey (2019) highlighted that sport and recreation was the most common way for people to maintain social networks and connections.
- Participation in skiing and other types of sport and recreation also have benefits for the mental wellbeing and physical health of Queenstown-Lakes residents.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

[Empty response area for outcomes to be addressed]

## G. Attachments



If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

Complete this form and email to [DNSubmissions@doc.govt.nz](mailto:DNSubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Ōtepoti / Dunedin Service Centre, PO Level 1, John Wickliffe House, 265 Princes Street, Ōtepoti / Dunedin 9016. Attention: Kelvin Brown.

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 ~~Objecter or~~ Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Mark Orr
Contact person and role of organisation	Queenstowner
Email (Communication from DOC will be via email unless alternate contact requested)	[Redacted]
Alternate contact for all DOC communication	
Phone/Mobile	[Redacted]
Postal Address and Post Code	[Redacted]

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



**A. Permission Application Number and Name of Applicant**

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Mark Orr
Organisation	Queenstowner
Date	21/01/2023

## D. Statement of Support, Neutrality or Opposition

- I Support this Application (I am making a submission)  
 I am Neutral on this Application (I am making a submission).  
 I Oppose this Application (I am making an objection).

## E. Hearing Request

- I Do Not wish to be heard in support of this objection or submission at a hearing.  
 I Do wish to be heard in support of this objection or submission at a hearing

Permissions Application Number: 100472-OTH

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I am in support of all aspects of the application by NZski Ltd to replace the old, dated Shadow Basin lift with the new alternative.

My reasons for my objection or submission are:

I am in support of this application being approved by the Director General due of the following:

- There has been lift serviced ski access to this section of inbounds terrain since the commencement of the Rastus Burn ski area, now known as the Remarkables. The current lift has been in operation since the ski area's approval and inception, opposing its replacement serves no logical basis.
- The new proposed lift line allows for less skier and equipment long term impact near the Shadow Basin tarns.
- The new lift location will provide safety and access improvements for members of the public.
- Energy saving improvements will be actuated through the efficient and technology of a modern lift

service.

- I would encourage the Department of Conservation to utilise this approval to reasonably leverage NZski to provide either monetary or in-kind concessions for further environmental improvements/mitigations for the State Park environment of the Remarkable ranges or beyond. There is a huge opportunity for DoC to work with concession holders nationwide to provide a means of further funding to expand better outcomes in environmental stewardship combined with commercial and recreational improvements for all New Zealanders. There are literally millions of hectares of true New Zealand wilderness under Department of Conservation management. Surely it is progressive to responsibly develop long existing concessions to their full potential, while protecting true wilderness areas from unmitigated future development? Again, there is and always has been a clear opportunity for DoC to work with concession holders in partnership to jointly fund and manage existing concession areas for the betterment of the conservation entity of New Zealand as a whole.

Thank you for taking the time to read this submission in consideration of your decision.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I do not have any issue with any aspect of the submission and believe that it is in the best interest of the Department of Conservation, NZski Ltd, the New Zealand Tourism industry, the environment of Shadow Basin and local residents for this requested installation to be approved by the Director General.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [DNSubmissions@doc.govt.nz](mailto:DNSubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Ōtepoti / Dunedin Service Centre, PO Level 1, John Wickliffe House, 265 Princes Street, Ōtepoti / Dunedin 9016. Attention: Kelvin Brown.

**OBJECTION OR SUBMISSION**

Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Skyline Enterprises Ltd
Contact person and role of organisation	Geoff McDonald
Email (Communication from DOC will be via email unless alternate contact requested)	geoff.mcdonald@skyline.co.nz
Alternate contact for all DOC communication	N/A
Phone/Mobile	+6421543633
Postal Address and Post Code	Level 3, O'Connell's Building, Camp Street, Queenstown, 9300

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Geoff McDonald
Organisation	Skyline Enterprises Ltd
Date	24/01/23

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Consent to replace the Shadow Chairlift at the Remarkables & alignment of lease term to main lease term

My reasons for my objection or submission are:

Skyline SUPPORTS the consent application for the following reasons;

- NZSki makes a big contribution to the local community and the operation at the Remarkables is a key leisure and outdoor sports facility for NZers and visiting tourists
- The current existing facility needs to be replaced to meet community needs and to ensure modern, safe operating systems
- NZSki have a proven track record of operating at the Remarkables in a responsible, safe manner. They will adhere to conservation principles and deliver a first class product
- This facility is important for the local economy, providing jobs and value added infrastructure

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

- we support the application as it stands, no amendments required

## G. Attachments

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Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

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**OBJECTION OR SUBMISSION**

Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Destination Queenstown
Contact person and role of organisation	Mathew Woods, Chief Executive
Email (Communication from DOC will be via email unless alternate contact requested)	mat@queenstownNZ.nz
Alternate contact for all DOC communication	
Phone/Mobile	03 441 0703
Postal Address and Post Code	50 Stanley Street, Queenstown, 9300.

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.





## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Mathew Woods
Organisation	Destination Queenstown
Date	24.1.23

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The replacement of the 37-year-old 4-seater chairlift to a more efficient highspeed 6-seater lift at the Remarkables Ski Area, Queenstown.

My reasons for my objection or submission are:

Queenstown is the Southern Hemisphere's premier four-season destination, and with four world class ski areas, ski is a major part of that. To maintain our reputation, we need to continue to provide excellent service with facilities that are kept up to date. Enabling skiers to move swiftly and efficiently in a modern and larger ski lift across the mountain will reduce queues on the ground and enable time for more recreation. This will significantly enhance the visitor experience and encourage repeat visitation of the domestic market which is so important to us. (The ski market is mostly domestic - followed by Australia.)

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

## G. Attachments

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### How do I submit my objection or submission?

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30 January 2023

**To:** Director-General  
Department of Conservation  
Ōtepoti / Dunedin Service Centre  
Level 1, John Wickliffe House  
265 Princes Street  
Ōtepoti / Dunedin 9016  
**Attention:** Kelvin Brown, Permissions Advisor  
dnsubmissions@doc.govt.nz

**From:** The Royal Forest and Bird Society of New Zealand (Forest and Bird)  
Ōtepoti/Dunedin Office  
PO Box 6230, Dunedin North  
Dunedin  
c.mcgaw@forestandbird.org.nz

### **Submission on NZSki Ltd - Remarkables Shadow Basin concession application**

**Proposed activity:** Application for a lease, licence and easement to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure within the Rastus Burn Recreation Reserve. The application for concession is for a term of 40 years.

The replacement lift system is proposed on a different alignment to the existing lift. It will commence from the same location but veer south of the existing alignment and extend to a higher elevation than the existing passenger lift system, in order to open up an additional 46.7 hectares of lift accessed terrain within the existing Remarkables Ski Area concession. It will increase the carrying capacity from 1,500 persons per hour to 2,400 persons per hour.

Construction of the replacement lift system involves earthworks for new trail development, earthworks for construction of top and bottom stations and tower foundations, and earthworks trenching for buried lift utilities and snowmaking. There will be indigenous vegetation clearance associated with these earthworks.

**Location:** Rastus Burn Recreation Reserve. Approximate GPS NZTM 2000: E1270347, N5002497 to E1269817, N5001797.



The applicant is pursuing other statutory approvals under the Resource Management Act for the proposed development from both the Otago Regional Council and Queenstown Lakes District Council. These processes are occurring concurrently with the Concession application, however at time of this submission they are not currently available for comment/submission.

Forest and Bird could not gain an advantage in trade competition through this submission. Forest and Bird wishes to be heard in support of this submission. If others make a similar submission, Forest and Bird will consider presenting a joint case with them at the hearing.

Forest and Bird opposes this application for the reasons set out below and seeks that the concession application be declined.

## **FOREST AND BIRD COMMENTS:**

### **Introduction**

The Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest and Bird) is an independent community-based conservation organisation, established in 1923.

Forest and Bird's mission is to give nature a voice on land, in freshwater and in the sea, on behalf of more than 100,000 members, donors, supporters and volunteers.

Forest and Bird are active participants in many local, district and regional planning and consenting decisions relating to environmental management, biodiversity and climate change across Aotearoa New Zealand.

There is a network throughout Aotearoa with fifty Forest and Bird branches. These branches carry out community conservation projects on land owned by Forest and Bird as well as publicly owned land.

Forest and Bird is pleased to note that the applicant has requested that the application be publicly notified.

Forest and Bird's Central Otago-Lakes Branch has an active interest in the district, and their comments have been included within this feedback.

### **Reasons for Opposition**

1. In response to NZSki's application for new lift towers and terminal building in 2018, Forest and Bird expressed concern that over the years there has been a "creeping development" of the Ski fields activities and consequent impacts on the environment. This makes it difficult to manage the ecological impacts and



creates a situation where one development necessitates another. This should not continue. There is need for a long-term management plan that includes the identification of the remaining ecological, natural character and landscape values, in addition to the remaining regionally significant wetland and sets out how these will be protected<sup>1</sup>. This statement is still true and relevant.

2. The application mentions that one of NZSki's strategies to adapt to climate change is to target future development at higher elevations at Remarkables where there is greater natural snowfall. This indicates that there will be more development in the future as the impacts of climate change are being realised, and granting this application will lead to successive further consent and concession applications.
3. The proposal is not just for a replacement/realigned system, but for expansion and extension to a higher elevation, and removal of the existing towers and associated infrastructure.
  - 3.1. The existing chair lift has 16 intermediate towers located along its path. All above ground structures are to be removed including the bottom and top stations. Initially the haul cable will be removed then the bottom station, Intermediate towers and lastly the top station and lift hut. Where possible any inground cabling will be removed along the length of the chair lift line.
  - 3.2. It is difficult to determine if the ecological assessment includes the removal of the existing infrastructure which is being replaced/realigned. It doesn't appear that this has been assessed, but should be.
  - 3.3. The application provides no information or evidence as to why the chair lift cannot be replaced in its current alignment and why an extension is necessary. It is assumed that extending accessibility to higher elevation is required because of less snow at lower levels due to effects of climate change.
  - 3.4. The Otago Conservation Management Strategy 2016 (CMS) allows further development of existing authorised ski fields, where their natural values are already modified<sup>2</sup>. This application proposes realignment/extension into unmodified areas.
  - 3.5. Potential effects of this proposal would be significantly less if the chair lift system was being replaced along the same alignment. Decision makers must be satisfied that that activities cannot be reasonably undertaken on the existing trails and lift alignment.
4. The granting of the application, the associated earthworks and removal of indigenous vegetation will result in cumulative effects of change to the landscape and potential loss of biodiversity. This application needs to be considered in light of its additional and cumulative impacts, as well as its direct impacts.

<sup>1</sup> Department of Conservation. 69588-SKI NZ Ski Limited Remarkables submissions 1 – 25 - Page 90.

<https://www.doc.govt.nz/contentassets/e9028c6097554d6d6bed57840ffdfac5/nzski-limited-remarkables-submissions-1-to-25.pdf>

<sup>2</sup> Department of Conservation - Otago Conservation Management Strategy 2016

<https://www.doc.govt.nz/globalassets/documents/about-doc/role/policies-and-plans/otago/otago-cms-2016-volume-1.pdf>



5. Extensive earthworks are proposed, not only for the construction of the new lift towers, but also for ski trails, access and snow making infrastructure (and presumably the removal of the old infrastructure in its existing alignment).
  - 5.1. There is a “Protocol for the Rehabilitation of Natural Alpine Environments Following Ski Area Development Between Department of Conservation and NZSki Limited.” (PRNAE). The scope of the document includes any work that results in any environmental disturbance including (not limited to) the indigenous vegetation, native fauna, soil, wetlands, streams, lakes and natural landforms of the ski area. The applicant proposes to undertake all earthworks in accordance with the relevant protocols for site works contained in this document.
  - 5.2. If consent is granted, it is of utmost importance that Department of Conservation staff conduct regular monitoring to observe progress and assess effectiveness of measures undertaken by the developer. This must include providing advice, troubleshooting unexpected problems, adjusting management approaches and, if necessary, requiring corrective action to ensure the objectives of the protocol are met.
6. Forest and Bird are pleased that NZSki has modified the proposed works so that all Regionally Significant wetlands mapped in ecological studies in the vicinity of the works have been avoided.
7. The proposal will result in the disturbance of indigenous vegetation. E3Scientific were engaged to complete an ecological assessment, in which they consider the potential adverse effects on indigenous vegetation and biodiversity to range from low to high.
8. The proposed vegetation clearance includes areas of natural rockfield, and natural, regenerating or relocated vegetation. The total area of disturbance over all of the areas surveyed by E3 Scientific will be approximately 42,442m<sup>2</sup> (an additional 4,257m<sup>2</sup> of the access road was not surveyed, and the access paths to the towers have not yet been finalised).
  - 8.1. Within this total area of disturbance of 42,442m<sup>2</sup>, approximately 28,322 m<sup>2</sup> is unmodified areas which includes rockfield and natural vegetation, and 14,120m<sup>2</sup> is modified, which includes disturbed areas and relocated vegetation.
  - 8.2. No threatened plants are located within the study area, however a range of At Risk or Data Deficient plants are present. These include:
    - *Brachyscome montana* - Data Deficient.
    - *Aciphylla simplex* and *Anisotome lanuginosa* - At Risk – Naturally Uncommon.
    - *Carex talbotii* (*Carex berggrenii*) - At Risk – Declining.

- *Myosotis drucei*, although Not Threatened, is not considered common. *Myosotis drucei* is only known from a handful of locations within the Rastus Burn.
9. The ecological magnitude of the effect of disturbing the mixed fellfield and cushionfield areas has been assessed. These areas are proposed to be relocated to ensure the connectivity and size of the areas is not reduced. However, as the assessment identifies, the success of relocating cushion and fellfield vegetation is still in the trial phase, therefore it is unclear whether this mitigation will reduce the level of impact. Due to this, the assessment states a high ecological value and a moderate magnitude of effect to this plant community.
  10. The level of effect of weed spread, without good management measures, has been assessed as very high.
  11. The fragmentation of native vegetation has been assessed as very high without management, and a weed management plan has been recommended for the edges of all relocated vegetation. An assessment of the current level of weeds in the area, along with the success of existing weed control would have been useful in reviewing this application.
  12. The range of vegetation communities and habitats found within the areas studied for the ecological assessment are assessed as suitable to provide feeding, foraging, and breeding habitat for the NZ Pipit (At Risk – Declining), kea (Nationally Endangered), and eastern falcon (Threatened – Nationally Vulnerable).
    - 12.1. The assigned ecological value under the EIANZ (Roper-Lindsay et al., 2018) for these species is Very High (Robertson et al., 2021).
  13. The ecological assessment highlights that unmodified areas provide higher value than the modified areas. This proposal will result in more modified areas being created, and less unmodified areas.
  14. An analysis of the success of current and previous restoration work would have been helpful in order to assess the likelihood of success of the proposed mitigation/vegetation relocation works.
  15. The herpetological assessment did not observe any lizards, or signs of lizards. However, this is likely because of only five hours of lizard surveying undertaken. The proposal area, which consists of exposed rock, loose rock, shards, scree, cushion field and patches of indigenous tussockland, is typical of lizard habitat. Although none were found, it is likely that they are present.
    - 15.1. All indigenous lizards (and therefore their habitats) are legally protected from disturbance or harm.
    - 15.2. Lizards are likely to be injured or killed during earthworks, as well as suffering habitat loss.
  16. During the herpetological survey, one peripatus/ngaokeoke was found at proposed Shadow Basin Chairlift Tower 8 (Plate 2).

16.1. The discovery of ngaokeoke is significant as this is a poorly understood organism. They are infrequently encountered in the alpine zone and may not have been previously discovered at such an elevation. In addition, Ngaokeoke have not yet been formally recorded in the Remarkables Range.

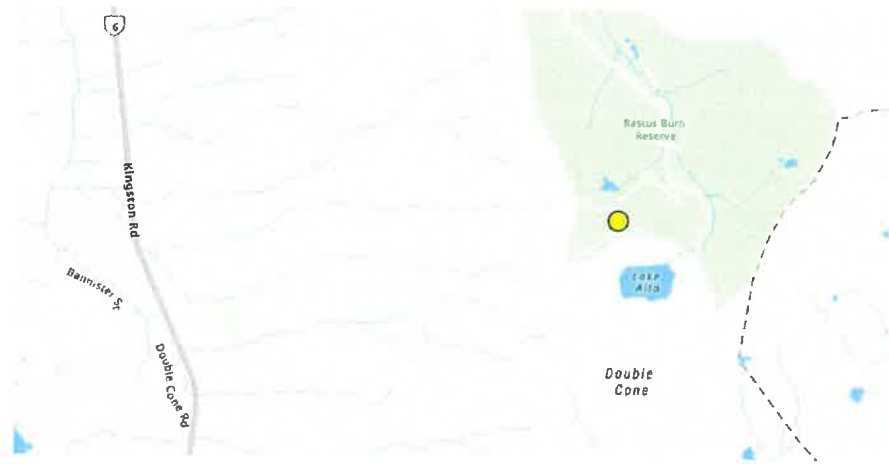


Figure 1: Location of Ngaokeoke observation (yellow dot)

16.2. Ngaokeoke are an ancient species, which have been around for over 500 million years, according to the fossil record. They are absent from much of New Zealand and have a scattered, discontinuous distribution - typical of a relic fauna.

17. The application did not include an invertebrate assessment. Invertebrate sightings were noted by E3Scientific during their ecological assessment, however a thorough assessment of effects on invertebrates has not been completed. Alpine environments can be important habitats for native New Zealand invertebrates such as wētā, grasshoppers, powelliphanta/giant snails, moths and butterflies, spiders, cicada and beetles. Invertebrate habitats and communities are easily disturbed or destroyed by earthworks and vegetation clearance.

17.1. The Remarkables are covered by the Department of Conservation Western Lakes and Mountains/Ngā Puna Wai Karikari a Rākaihautū Conservation Management Strategy 2016 - The area is identified as supporting high invertebrate diversity, including endemic and threatened species, such as several species of giant weevil, two black cicadas, a flightless stonefly and a rock-bluff moth.

18. The Department of Conservation has identified an increasing need to manage high altitude biodiversity and how to effectively to reverse declines in biodiversity. Allowing developments such as this is contradictory to this statement<sup>3</sup>.

<sup>3</sup> Department of Conservation – Alpine Habitats

<https://www.doc.govt.nz/nature/habitats/alpine/#:~:text=Alpine%20habitats%20are%20home%20to,spiders%2C%20cicada%20and%20beetles>)



19. The whole of the Remarkables Skifield Zone is classified as Outstanding Natural Landscape (ONL). This classification is a clear indication of the very high landscape values of the Remarkables Ski Area and adjoining areas as a whole.

19.1. The proposal will present new and visible signs of ski area infrastructure (from outside the Ski Area Sub-Zone) on a prominent ridge of the Kawarau/Remarkables Range. Some of the proposed chairlift and trail works will be visible from a portion of the Whakatipu Basin and limited locations within the Remarkables Conservation Area. From all locations outside of the Ski Area SubZone, the 4WD access track, trails, towers and the top station will be legible to varying extents depending on distance viewed, snow conditions and lighting.

19.2. The proposed upper trail works will be visible and particularly so during intermittent snow cover and in certain light conditions. The proposed earthworks will result in some adverse effects on the natural character of Shadow Basin. It is expected these new trails will create a permanent and cumulative effect to the landscape and visual amenity of the Rastus Burn Basin.

## Statutory Assessment

As this application is for a concession and not a consent, it has been assessed under the Conservation Act and Reserves Act only, however it is apparent that this development is contrary to sustainable management under the Resource Management Act. A full statutory assessment will be undertaken when submitting on consent applications through Otago Regional Council and Queenstown Lakes District Council.

### Conservation Act 1987

20. Section 17S sets out the contents required in a concession application. This application fails to adequately describe the ecosystem and biodiversity values of the site due to a limited herpetological survey and no invertebrate survey, therefore the full potential effects of the proposed activity cannot be determined. The applicant also failed to provide a reason for the request as required by the Act.

21. As above, the application does not fully comply with Section 17S and the Minister does not have sufficient information to enable them to fully and adequately assess the effects and the proposed methods to avoid, remedy or mitigate the adverse effects as well consider the potential impacts of climate change and may therefore decline the application under S17U2.

22. Under Section 17U (4):

*The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing structure or facility, where he or she is satisfied that the activity—*

*(a) could reasonably be undertaken in another location that—*

*(i) is outside the conservation area to which the application relates; or*



*(ii) is in another conservation area or in another part of the conservation area to which the application relates, where the potential adverse effects would be significantly less; ..*

The application does not explain why the existing structure cannot be replaced along the same alignment, in which it would be assumed that the environmental effects would be less. It appears that the proposal is for providing enhanced access to new areas. The Minister has to be satisfied that the activities cannot reasonably be undertaken on the existing alignment.

23. Section 17 W states:

*“Where a conservation management strategy or conservation management plan has been established for a conservation area and the strategy or plan provides for the issue of a concession, a concession shall not be granted in that case unless the concession and its granting is consistent with the strategy or plan.”*

This area is covered by the Otago Conservation Management Strategy 2016 (CMS).

23.1. The CMS expresses concern about the impacts of climate change in relation to the ski fields and the need to take a precautionary approach to the approval of new structures to avoid the risk of abandoned structures and adverse landscape impacts. The risks and possible impacts of climate change are only touched on very briefly in the application.

23.2. The application has not adequately assessed the impacts on natural quiet and current recreational users as per Policy 2.3.21 of the CMS. The proposed lift is higher in altitude and provides skier access to new areas within the ski field. These developments are additional and the impacts will be cumulative.

23.3. The CMS has a preference for developing existing ski fields as opposed to developing new ski fields but requires a precautionary approach in terms of new and additional structures and terrain modification.

23.4. Policies relating to ski field development are set out on pp69-70 and 155. In particular Forest and Bird draws your attention to Policies 2.3.21, 2.3.22 and 3.25.1-3.25.6. These policies anticipate concessions for further development and expansion of existing ski fields, including the Remarkables ski field, (Policy 2.3.22) and set out the constraints and expectations. Further development is not a given.

23.5. Policy 2.3.21 provides that when considering applications for new utilities, structures or facilities throughout this Place (with the exception of the upper Wye Creek valley), should have particular regard to the potential adverse effects on:

- a) *natural ecosystems, landscapes and natural character, particularly in areas where structures and facilities are currently absent;*



- b) *catchment water quality and quantity, including in Lake Alta;*
- c) *priority ecosystem units and threatened species;*
- d) *natural quiet;*
- e) *current recreational uses; and*
- f) *opportunities available for such structures or developments off public conservation lands and waters.*

Forest and Bird notes that the proposed developments are in an unmodified area that has high natural character, threatened species, and outstanding ecological values, which will be affected by the proposal.

23.6. Policy 2.3.22 states:

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

- a) *the outstanding natural landscapes and ecological values of The Remarkables and the Tāpuae-o-Uenuku/Hector Mountains;*
- b) *the landscape and ecological (including water quantity and quality) values of the priority ecosystem unit at Lake Alta;*
- c) *the recreational experiences of other users; and*
- d) *the ability of users to access the area year-round.*

Forest and Bird do not believe that the cumulative effects of successive developments have been assessed, and will be adequately avoided, remedied or mitigated.

23.7. Policy 3.25.2 states that:

*Should in considering the development of new and existing authorised ski fields apply a precautionary approach to the approval of new structures, accommodation facilities and terrain modification and consider both the likely effects of water use (for snow-making), the likely longevity of the field in the face of climate change, and any appropriate land remediation and facility removal costs should the ski field cease to operate.*

Forest and Bird do not believe that the application has included a consideration of the likely longevity of the field in the face of climate change.

24. The Minister has the power under 17X to enforce conditions and the applicant has agreed to conditions recommended by E3Scientific and conditions relating to the PRNAE protocols agreed between DOC and NZski.



24.1. E3Scientific's report recommends management options, it is assumed that the voluntary conditions NZSki have offered are these management options.

24.2. The applicant has not volunteered to include conditions related to the management options recommended by the herpetological survey, and Forest and Bird believe these should be included should concession be granted:

- The avoidance of any ngaokeoke habitat (especially adjacent to Tower 8), along the proposed route by micro-siting Shadow Basin Tower sites to determine the position that may best avoid ngaokeoke habitat and still be functional.
- Advice from an invertebrate specialist in ngaokeoke and any options that the Department of Conservation may be able to identify.
- The Department of Conservation may make recommendations to NZSki to undertake Ngaokeoke management, by way of further surveys or rehabilitation of the proposed works.

24.3. Although these conditions may less the environmental impact for this development proposal in particular, they do not address the cumulative effect of ongoing development in the area.

25. The applicant has not mentioned nor volunteered the possibility of payment of compensation for any adverse effects of the activity on the Crown's or public interest in the land concerned which is provided for under S17 X (d).

25.1. If concession is granted, Forest and Bird urge the Minister to consider what compensation might be suitable for the permanent damage to the landscape and outstanding natural environment that cannot be avoided, remedied or mitigated in order to create some conservation and landscape gains to make up for the significant losses to these values. Extra restoration in our view would not count as compensation as it is or should be part of either current or past mitigation works.

25.2. There are a range of potential compensation options including but not limited to:

- Substantive contribution to the Department's land acquisition fund to enable the possible purchase of another conservation area, with similar landscape and ecological values.
- Conservation work to further protect kea and falcon here and elsewhere within the Hectors/Remarkables Special place.

#### **Reserves Act 1977**

26. The purpose of the Reserves Act is:

*(a) providing, for the preservation and management for the benefit and enjoyment of the public, areas of New Zealand possessing—*

*(i) recreational use or potential, whether active or passive; or*



- (ii) *wildlife; or*
- (iii) *indigenous flora or fauna; or*
- (iv) *environmental and landscape amenity or interest; or*
- (v) *natural, scenic, historic, cultural, archaeological, biological, geological, scientific, educational, community, or other special features or value.*

(b) *ensuring, as far as possible, the survival of all indigenous species of flora and fauna, both rare and commonplace, in their natural communities and habitats, and the preservation of representative samples of all classes of natural ecosystems and landscape which in the aggregate originally gave New Zealand its own recognisable character.*

This application is contrary to the Reserve Acts purpose, as it involves significant changes to natural habitats of both flora and fauna in the area, as well as amenity impacts to the natural environment and beauty of Rastus Burn Reserve.

#### **Forest and Bird Asks...**

That the application be declined in its entirety due to its effects on natural habitat, uncertainty of success of native vegetation relocation, failure to assess invertebrates, failure to address climate change and cumulative effects of ongoing development in the area.

Thank you for the opportunity to submit on this proposal. Forest and Bird would be happy to discuss these matters further should you wish to do so.

Ngā Mihinui



Chelsea McGaw - Regional Conservation Manager (RCM) Otago & Southland

The Royal Forest and Bird Society of New Zealand

PO Box 6230, Dunedin North, Dunedin 9059

[c.mcgaw@forestandbird.org.nz](mailto:c.mcgaw@forestandbird.org.nz)



and

Central Otago-Lakes Forest and Bird Branch



**NZAC submission on NZSki Ltd - Remarkables  
Shadow Basin concession application  
100472-OTH: NZSki Limited**



**30 January 2023**

TO: Director-General  
Department of Conservation  
Ōtepoti / Dunedin Service Centre  
Level 1, John Wickliffe House  
265 Princes Street  
Ōtepoti / Dunedin 9016  
Attention: Kelvin Brown, Permissions Advisor  
  
By email: [dnsubmissions@doc.govt.nz](mailto:dnsubmissions@doc.govt.nz)

**Name of submitter: New Zealand Alpine Club**

**We wish to be heard in support on this submission.**

**CONTACT DETAILS:**

Karen Leacock – NZAC General Manager  
6/6 Raycroft St  
Waltham  
Christchurch 8011

Email: [general.manager@alpineclub.org.nz](mailto:general.manager@alpineclub.org.nz)

**Re: Application for a 40-year term concession (lease, licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area, Queenstown.**

This submission has been prepared by the New Zealand Alpine Club (hereafter The Club) in response to the above concession application by NZSki Limited.

The Club is the premier mountaineering club in New Zealand. It was established in 1891 and has a growing membership of over 4200. It has a proud tradition of training, education, advocacy and protection of New Zealand's mountains and crags, to allow recreationists to keep enjoying these magnificent resources.

The Club carries out many activities throughout the wider Southern Alps, and its members have a strong interest and historical affiliation with the Remarkables and the Rastus Burn Recreation Area. Members use and enjoy the area for rock climbing, walking, mountaineering, ski touring, climbing festivals and climbing instruction.

Our members, and indeed other backcountry users, value the backcountry and intrinsic values that exist in the Rastus Burn Recreation Area/Remarkables. They also value the public road access that is provided for by the road access agreement. No other comparable access exists in the area.

Thank you for the opportunity to submit on the above concession application, and please find our submission below.

**1. Our submission**

The Club is NEUTRAL on the current NZSki concession application above. We believe the submission is lacking in depth and information required for a complete analysis of the effects on our members and the general public, and therefore cannot support or oppose the application without sufficient information on the points below.

**2. Other submissions**

The Club is aware of and broadly supports the submissions by The Queenstown Climbing Club and the Federated Mountain Clubs acknowledging they both support similar user groups to The Club.

**3. Public consultation**

We note with disappointment that NZSki has not consulted with any user groups prior to submitting the concession application. NZSki is very aware of the large number of interest groups who regularly use and value the area, and it would have been prudent for consultation to have taken place as part of standard project process.

**4. NZSki concession to operate in the Rastus Burn Recreation Reserve**

We have requested, from the DOC, the status of the overarching concession for NZSki to operate in the Rastus Burn Recreation area. At the time of submitting, we had not received a response. We understand that this concession may have expired. If this is the case we believe it is inappropriate to be considering another concession of this magnitude whilst the main concession is being reviewed.

**5. Shadow Basin**

Shadow Basin provides access to the country's most valued alpine climbing and tramping areas - the West Face of the Remarkables, The Grand Traverse of The Remarkables, The Telecom Towers, and the Queen's Drive (alpine tramping). The West Face and Queens Drive can only be accessed via the col at the top of the current Shadow Basin Lift. This is normally accessed by using the cat track which runs from the skifield to Shadow Basin.

**6. Effects on the Lake Alta Cirque**

Our members use the Lake Alta Cirque in summer and winter for rock climbing, walking, mountaineering, ski touring, climbing festivals and climbing instruction.

The Lake Alta Cirque, although close to the skifield, has remained generally clear of visible skifield infrastructure. Both in summer and winter, people can have the experience of a remote and backcountry area, within easy access from the skifield road.

The concession application does not consider the effects of the new work on the Lake Alta Cirque and its visitors. The Club is particularly concerned about the visual effects of the infrastructure from the Lake Alta Cirque, and the loss of peace and quiet for people recreating in this area, due to the more significant numbers of skiers in the area. These effects should be assessed and presented as part of the concession document.

**7. Construction plan**

There is no detail within the concession on the construction plan. The Club requires that the area be kept clean and tidy with due concern taken for the environment in which construction is taking place.

**8. Public access during the construction period**

There is no detail within the concession application as to how public access and interface will be managed during the construction period.

The Club request that if the concession is granted in any form, conditions are placed such that construction is managed so that the road and top carparks are always open to the public with continued access to the rest of the Rastus Burn Recreation Reserve and the Remarkables Conservation area.

Our concern is if work is being done in Shadow Basin, that access to the West Face (for climbing) and the Queens Drive (tramping) will be affected. These two popular areas are accessed via the cat track to Shadow Basin and the col at the top of the current Shadow Basin lift.

In previous years during construction periods, the road has been closed to recreational users, or the road has been open only to the lower carparks. Having the top carparks closed will affect the time taken to access climbing and tramping areas which may become too long to make it a worthwhile trip, effectively restricting reasonable public access.

Previous road closures have been based on Health and Safety concerns. It is The Club's view that Health and Safety issues can be mitigated and managed if this is a requirement built into the construction planning.

**9. Public access after installation**

Intensification of the Shadow Basin area may result in restrictions to users of the area, and there is no indication in the concession document of how this may be affected after installation. The Club requests that this is included as part of the concession application and require that the public can have the same access to the areas above, as they do at present.



**OBJECTION OR SUBMISSION**

Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Totally Tourism Limited
Contact person and role of organisation	Mark Quickfall CEO
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.

# OBJECTION OR SUBMISSION



Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Mark Quickfall
Organisation	Totally Tourism Limited
Date	27 January 2023

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## **F. Objection or submission**

The specific parts of the application that this objection or submission relates to are:

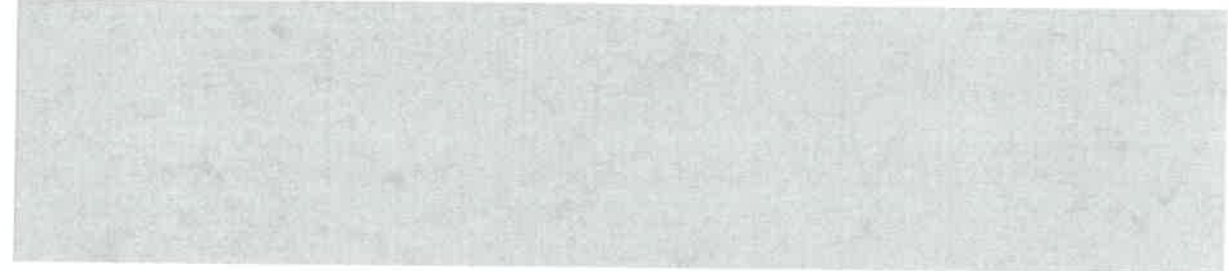
NZSki and The Remarkables has made a huge contribution to the local community through the provision of recreational opportunities including safe access to the mountains and ongoing conservation activities in the Rastus Burn and beyond.

The existing 37-year-old, 4-seater chairlift needs to be replaced so NZSki can meet the very latest health & safety and customer service standards.

Supporting NZSki and this application is important to me because NZSki has more than 20 years' experience and proof that it is able to operate responsibly on public conservation land and contribute to community wellbeing, positive conservation outcomes and the economy.

Investment in tourism and recreational infrastructure is important to the local, regional and national communities and the economy.

My reasons for my objection or submission are:



The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Grant a concession which provides sufficient tenure to warrant the investment and practical flexibility to allow the applicant to meet any imposed conditions.

Balance environmental and other conditions against the positive and practical development of the area.

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## **G. Attachments**

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

Complete this form and email to [DNSubmissions@doc.govt.nz](mailto:DNSubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Ōtepoti / Dunedin Service Centre, PO Level 1, John Wickliffe House, 265 Princes Street, Ōtepoti / Dunedin 9016. Attention: Kelvin Brown.

**Submission on the Concession Application by NZ Ski Limited  
for replacement Shadow Basin Chair Lift  
Federated Mountain Clubs**



TO: Department of Conservation (DOC).

Tēnā koe

**FMC**

1. Federated Mountain Clubs (FMC) thanks you for this opportunity to submit on the [above concession application by NZSki Limited \(Application\)](#).
2. FMC proudly represents the interests of over 100 tramping, climbing, white water, unpowered flying and other outdoor recreational clubs, who today and together have over 22,000 members. It has been our privilege to represent their recreation and associated conservation kaupapa for over 90 years.
3. FMC wishes to be heard on its submission. Given recent experiences, we remind DOC that hearings held under section 49 of the Conservation Act (Act) are a lawful requirement to hear "objections". Any hearing of this Application is not an opportunity for the applicant to fill factual gaps in the Application, to alter proposals, or to rebut any FMC or other submitter comments.

**SUMMARY**

4. FMC **opposes** the application. We acknowledge that this is in tension with recreational interests enjoyed by some FMC members who enjoy skiing the Remarkables Ski Area. Yet given the importance of Remarkables access to our members, we would support the Application only with guarantees of strong access protection conditions during construction, including relating to parking, and "one up" pass conditions after construction. We submit that DOC can lawfully, and ought to, include such conditions. We also say the Application cannot be properly - if even lawfully - processed if the wider Remarkables concession has expired.
5. FMC has a well-known and longstanding interest in the Remarkables area, yet neither we - nor any recreational club - was approached by NZSki about the Application. For that reason, FMC recently approached NZSki about its interest in access and "one up" conditions. We have received a response proposing that:
  - a. During construction, access be maintained into Lake Alta, then following the spur up along the ridge dividing Lake Alta with Shadow Basin to the point adjacent to entry into Elevator Chute; and
  - b. Following construction "one up" access be offered on the Shadow Basin Chair for \$30.00 (as is apparently available on the Remarkables' Curvey Basin lift).
6. The clarity of proposed solutions is welcome, as was NZSki's venturing the suggestions. FMC urges their inclusion as conditions of any concession granted (though we suggest that conditions for Curvey Basin "one ups" also be required, as even many seasoned local skiers have been unaware of the availability of such passes).

FMC - FEDERATED MOUNTAIN CLUBS

www.fmc.org.nz | President: Robin McNeill 021 516 366 | Vice-President: Allan Brent 027 306 2965  
Executive Officer: Danilo Hegg [eo@fmc.org.nz](mailto:eo@fmc.org.nz) Ph 027 339 2688  
Federated Mountain Clubs | PO Box 1604 | Wellington 6104 | New Zealand/Aotearoa

7. However, those conditions would not be sufficient. In our view the Application should only be granted with the following additional conditions:
  - a. Protecting access to the top car parks during construction; and
  - b. Conditions protecting access to the Telecom Tower Col during construction (which the above would not guarantee as the NZSki proposal necessitates travelling the ridge access between Pt 2200 and the Col - which is not safe or practicable); and
  - c. Conditions protecting on-going access through the Shadow Basin in all seasons.
8. While simple solutions might mean no conditions are necessary in some cases, this is not such a case. NZSki's (welcome) proposals, in addition to being practically insufficient and not matching skiers' experience on the mountain, are nowhere mentioned in the Application itself, and indeed are in tension with it. In contrast, the Application itself could fairly be described as non-serious in its treatment of recreational access or interests, as we detail below, notwithstanding that the ski field is on public conservation land and enjoys only a time-limited statutory privilege to keep it there.
9. The "whole picture" of the Application is lacking. FMC's view is that DOC does not have fair, accurate or adequate information of the true potential or cumulative effects of the Application. As is increasingly common, NZSki has not met the minimum prescribed application requirements and, strictly speaking, DOC cannot properly consider this Application. It is our hope that DOC will act according to law, and require at minimum further information of NZSki on condition it proposes to guarantee recreational access throughout and after construction.
10. We also understand that the "main" concession for the Remarkables Ski Field may have expired in about March 2022. If that is the case, then the only proper course of action would probably involve the withdrawal or decline of this application so as to better allow the open and full consideration of these effects, and of NZSki's long-term plans for the Remarkables Ski field. The proposed reclassification of the Kawerau/Remarkables Conservation Area is significant context in this regard.
11. We would engage constructively in any such processes.

#### **THE IMPORTANCE OF REMARKABLES ACCESS**

12. FMC's key interest in the application is retaining and fostering improved amateur recreational access to the "Queen's Drive" and Remarkables West Face, "Telecom Tower" and Remarkables summit ridge areas – both during the construction of a replacement Shadow Basin Chair (*Chair*), and once built.
13. These areas contain New Zealand's most popular opportunities for ice and mixed climbing, as well as some of our most accessible summer alpine rock climbing. The Alta Basin, which a re-sited chair lift would render much more easily accessible by ski, is also popular as ski-touring access and outright destination. Nearby areas routinely host snow instruction courses run by the Otago and Southland sections of the New Zealand Alpine

Club (NZAC).<sup>1</sup> The area also hosts the annual Remarkables Ice and Mixed Festival, New Zealand's biggest alpine climbing event.

14. As such, these areas are at the very foundation of the strength of New Zealand's alpine community. Free and ready access to these areas – in all seasons – is crucial to that strength. Such access includes not only low-avalanche-risk approaches to Queen's Drive, but also handy year-round car-parking. Previous NZSki construction at the Remarkables has affected the latter in particular – needlessly and avoidably.
15. The same area is also used by recreational free fliers of the New Zealand Hang Gliding and Paragliding Association (NZHGPA),<sup>2</sup> when daylight, weather and lifted civil aviation restrictions align. It is regarded as an iconic New Zealand "hike and fly" opportunity.
16. We reiterate that we welcome NZSki's access proposals, but they would cut ready access to the Telecom Tower Col, and so to the Queen's Drive and Remarkables West Face. As such they would compromise access to the overwhelming majority of potentially affected climbing access, and leave intact only access to the Remarkables Summit Ridge. These shortcomings would have been apparent to NZSki if it had consulted with local recreational communities.
17. We are aware that recreational clubs including FMC member clubs have made separate submissions on the importance of the area in equally plain terms.

#### PROMOTING RECREATION

18. As an organisation, FMC wholeheartedly supports initiatives that promote low-impact outdoor recreation. Except at superficial levels, this is not such an initiative, and on the contrary NZSki's Application materials show scant regard for the low-impact recreation opportunities in the area, as detailed above.
19. Fostering recreation is also, of course, a DOC function over and above "allowing" tourism.<sup>3</sup> While we are aware of views held by some in DOC that recreation and tourism cannot be easily distinguished, the law must be applied nevertheless. This is not a case where making the distinction is challenging – here the interests above can be readily distinguished from the ordinary visitor – or tourist – to the Remarkables Ski field. As such DOC's function in processing this Application can only be to allow the application *to the extent it is consistent with promoting the on-going and nationally-significant recreational activity* mentioned above. As such, and at minimum, a lack of protective conditions is inconceivable.

#### THE APPLICATION IS DEFICIENT AND HAS NO REGARD FOR RECREATION

20. Turning to the Application documents, several features bear highlighting.
21. First, in the passive voice, the application "considers" the Queenstown Lakes District Plan "to provide an appropriate framework for consideration of the effects of the proposal on landscape and visual amenity and overall human use values of the environment in this assessment of the proposed activities under the Conservation Act".<sup>4</sup> Who exactly "considers" that is unclear. If it was the applicant's planner, they will know that statement

<sup>1</sup> NZAC is an FMC member club.

<sup>2</sup> NZHGPA is also an FMC member Club.

<sup>3</sup> Section 6(e) of the Conservation Act 1987.

<sup>4</sup> Application, page 16.

to be materially misleading. QLDC plans are not relevant to this application, and do not contain the yardsticks against which the application must be judged. They are Resource Management Act plans made for entirely different public purposes – generally-speaking for containing the effects of the exercise of private rights on private land, and not - as here – the exercise of a statutory privilege on public land administered solely for a statutorily-defined “conservation”.

22. The statutory landscape here is much more simple. Where there is a conservation management strategy, as there is, any concession granted must be consistent with it.<sup>5</sup> The applicable planning document is the Otago Conservation Management Strategy 2016 (CMS). Most relevantly to recreation in the area, the CMS provides:
- 3.25.4: Where practicable, encourage non-skier and/or non-ski season visitor use, and visitor use beyond the ski field consistent with the outcomes at Place*
23. The Application does not make any attempt to analyse the application against the recreation-related aspects mentioned in the CMS section on Western Lakes and Mountains/Ngā Puna Wai Karikari a Rākaihautū Place outcomes. FMC’s review of that part of the CMS found at least 10 relevant references to recreation, perhaps most notably one describing the Remarkables as having “outstanding” recreational values.<sup>6</sup> Yet the best the Application has to offer is that “*The proposal will not affect access to the Rastus Burn Conservation Area*” – which this submission demonstrates is materially inaccurate, and which treatment would only appear to prevent walls being constructed around entire conservation areas.<sup>7</sup>
24. Put simply, the application can only be properly granted if its conditions can make the proposed activity consistent with the outstanding recreational values of the area. These values are summarised above, and again FMC is aware that recreational clubs, including FMC member clubs, have made separate submissions on the importance of the area in equally plain terms.
25. Finally, and perhaps most concerningly, the actual treatment of human use values in the application itself could be well described as non-serious. Again in the passive voice, the application provides that “the proposal is considered to enhance the quality of the recreation experience at The Remarkables Ski Area.”<sup>8</sup>
26. One might ask who, exactly, “considers” this to be the case. Again, if it is the applicant’s planning advisor, FMC’s view is that such a view could only be regarded seriously by DOC if NZSki had indeed approached the Wakatipu, Otago and national recreational community before making the Application. That has not occurred. Moreover, while we have welcomed engagement with NZSki on this issue, it has had a history of rebuffing reasonable proposals on road use to the Remarkables out of season, and appears at present to be taking tolls but not maintaining the road.
27. Similarly, one might ask whether the applicant’s planning advisors could seriously take the position they do on temporary effects – which entirely lacks any consideration of public access during the construction phase – if they had properly understood and assessed the views of the recreational community.

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<sup>5</sup> Section 17W of the Conservation Act.

<sup>6</sup> Refer section 2.3 of the Otago CMS 2016, from page 57.

<sup>7</sup> See page 31 of the Application.

<sup>8</sup> Application, page 18.



28. The short point, to repeat, is that FMC could only support this application with strong access guarantee conditions as detailed above, including protecting access through construction sites and protecting practicable car-parking and road year round. This ought to include revisiting Remarkables toll road issues.
29. FMC considers that without proposed conditions from NZSki to guarantee access both during and after construction, ie to avoid, remedy, or mitigate any adverse effects of the proposed activity – the Application does not properly meet the requirements of section 17S(c)(ii) of the of Act, and accordingly DOC will not properly be able to process the Application under section 17T. Further, in absence of such proposals, submitters have not had enough information to meaningfully respond and give objections “on” the application (and its effects – properly assessed), this consultation process must also be flawed.<sup>9</sup>
30. It is our hope that DOC will act according to law, and require NZSki to provide further information on conditions that it proposes to guarantee recreational access throughout and after construction – after all the application indicates that conditions have been volunteered in return for granting the concession.<sup>10</sup> FMC will engage constructively in such a process.
31. We regret the tone of this part of our submission, though in our experience the Applicant has not always seriously respected outdoor recreation despite enjoying the privilege of using public land for private benefit, nor DOC’s legal duties to foster recreation. As such it is necessary to point out the shortcomings – including planning and legal shortcomings – in its dealings and Application plainly.

#### OTHER EFFECTS

32. Finally, FMC wholeheartedly supports low impact recreation. In this regard, and though we are not ecology experts, many issues of cumulative effects arise.
33. First, and unsurprisingly, Application documents explicitly refer to works relating to snow-making. In this regard, the Application includes leases, and a term of 40 years. Leases or licences are limited to 30 years terms except in “exceptional circumstances”.<sup>11</sup> Yet the application makes no attempt to justify the exceptional circumstances, merely calling a 40 year term “appropriate”.<sup>12</sup> On the other hand, the application also covers issues to do with warmer winters, including over the next 40 years, but significantly fails to mention any concrete actions should maintaining artificial snow in the Basin become unviable in that time – things like bonding for the removal of the lift.<sup>13</sup> If this is not bonded by other concessions, it must be here.
34. If this replacement is to be a “last hurrah” for a shadow basin chair, FMC’s view is that the Conservation Act will not properly accommodate the trading-off of a short period of easy downhill skiing fun for potential environmental and landscape effects associated with alpine plant, wetland and invertebrate disturbance. After all, like must be treated with like, and similar considerations recently prevented a similar proposal at Cardrona.

<sup>9</sup> FMC participates in this process without prejudice to that position.  
<sup>10</sup> Refer multiple references to “conditions volunteered”. No draft conditions appear to be available.  
<sup>11</sup> Section 17Z(1) of the Act.  
<sup>12</sup> See page 29.  
<sup>13</sup> See page 24.

35. More broadly, we understand that NZSki's "main" concession expired in about March 2022. If that is correct, and bearing in mind that there is no such thing as "renewal" of a concession, the only proper course is for the application to be withdrawn or declined such that the whole picture can be considered. Further, and whether or not that is correct, everybody is aware of NZSki's widely-known designs on the Doolan's Basin - and it is obvious that NZSki will benefit through a pattern of making concession applications, and perhaps variations, piece-meal where again the "whole picture" will be lacking. Might Shadow Basin infrastructure, being in a solar aspect, be abandoned in even shorter order than 40 years, with the gear relocated to a yet-to-be-consented Doolan's set up? Or, if the lift "has to stay so it can pay", might this Application "bake in" a set of unknown effects associated with an as-yet unplanned set of bike trails? If so, does the existing landscape plan really show everything it could? How would these indeterminate plans affect, or be affected by, a reclassification of the Kawerau/Remarkables Conservation Area?
36. FMC does not say that NZSki should provide DOC a crystal ball containing its own undetermined future plans. But nor does DOC have fair, accurate or adequate information of the true range of *currently-known* possibilities opened by the new lift - i.e. the *known* potential and cumulative effects of the Application. Such plans are not market-sensitive and NZSki needs to lay them out. As such, NZSki has not met its section 17S obligation in this regard, leading to further section 17T issues for DOC.
37. As such, FMC would welcome any course of action – probably involving the withdrawal or decline of this application – that better allowed the open and full discussion of NZSki's long-term plans for the Remarkables Ski field. Again FMC would engage constructively in such a process. We fully accept that such a course may alter the short-term financial proposition for NZSki in some small way, but it is not DOC's role to ensure that a concessionaire's activity is financially optimised from its own perspective.

Yours sincerely

Allan Brent

**Vice President, Federated Mountain Clubs**

**OBJECTION OR SUBMISSION**

Department of  
Conservation

*Te Papa Atawhai*

New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Queenstown Climbing Club Inc
Contact person and role of organisation	<i>Mr Oliver Austin – President of the Queenstown Climbing Club</i>
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	[REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Mr Oliver Austin
Organisation	Queenstown Climbing Club Inc
Date	28/01/2023

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

### INTRODUCTION

1. The Queenstown Climbing Club (QCC) has over 4100 members, many of which spend a considerable amount of time in the Remarkables and wider Tapuae-o-Uenuku / Hector Mountains. Our members are avid recreationalists who participate in climbing, mountaineering, ski touring, hiking, camping and other outdoor activities in the subject area.
2. Central to the club's values is Kaitiakianga; the guardianship and care for the environment that sustains us, physically and emotionally. QCC has a historied and successful list of projects which support our role as guardian, including projects which involve native planting, removal of wilding pines and pest control. We maintain healthy and collaborative relationships with stakeholders who manage the lands we use (DOC, QEII, QLDC, and private owners).
3. QCC has observed the incremental impact on the Rastus Burn Recreation Reserve perpetuated by NZSki Limited (NZSki). While QCC values the contribution NZSki makes to recreational values, especially those associated with snow sports, they have also reduced public access to our public lands. This includes limiting the public access to the reserve or across the Ski Area Sub-Zone (SASZ) to enable NZSki to carry out their commercial activities, the closing of the access road during times of the year for their own purposes (such as construction) and now, the toll to use the road in summertime. We have worked with NZSki in many ways, but we are seriously concerned how further incremental change will limit public accesses to our public lands.
4. We have significant concerns with regard to NZSki's current proposal. QCC does not support NZSki's proposal for the following reasons:
  - The proposal is pre-emptive to.
    - (i) The reclassification of the Kawarau / Remarkables Conservation Area reclassification
    - (ii) The renewal of NZSki's Head Lease, which we understand expired 1 March 2022.
  - The proposal would result in adverse effects on natural character, remoteness and visual amenity values with particular regard to adverse effects on the Lake Alta Cirque.
  - The proposal will further limit public access to and enjoyment of public land.
  - The proposal does not recognise the effects of climate change.

## **THE KAWARAU / REMARKABLES CONSERVATION AREA RECLASSIFICATION PROCESS**

5. DOC is currently reviewing the classification of the Kawarau / Remarkables Conservation Area. This reclassification process aims to better '*recognise and protect conservation and cultural values on the Kawarau / Remarkables Conservation Area*'. The DOC driven process recently received submissions on key questions about the future of the Remarkables. The SASZ forms part of the Rastus Burn Recreation Reserve which is in the larger Kawarau / Remarkables Conservation Area. The much larger Kawarau / Remarkables Conservation Area is currently classified as Stewardship land. However, it is very likely the area will be up-classified. The QCC submitted that the area should become a National Park. We consider the Kawarau / Remarkables Conservation Area is an area of extremely high scenic, natural, remote and recreational value.
6. QCC considers the DOC reclassification a significant piece of work which represents public interest in our nations valuable land assets. We regard this process should be completed prior to the consideration of any further development within the Kawarau / Remarkables Conservation Area, regardless of whether it is in a SASZ or not.
7. We also understand NZSki's Head Lease expired 1 March 2022. We are not aware of any renewal of that lease or the terms of which that has been, or is being considered.

## **ADVERSE EFFECTS ON NATURAL CHARACTER, REMOTENESS AND VISUAL AMENITY VALUES**

### *Lake Alta Basin*

8. We consider there are significant short comings and oversights in the Landscape and Visual Assessment prepared by Phillip Blakely. The most significant is Mr Blakely's avoidance of addressing adverse effects of the proposal on the Lake Alta cirque.
9. In part 4.2 Mr Blakely describes his methods of determining the proposal's visibility through the use of 20m and 50m contours as well as on the ground observation. We consider the use of 20m contour data sets not sufficient for determining the visibility of the proposal, particularly in the localised context. It is clear 1m contours are available as they are provided for in the applicants earthworks plans.
10. It is also unclear whether Mr Blakely has assessed the effects of the proposed earthworks or an approximately 7m high top station, which is proposed to be located near a prominent ridge. We do not

consider Mr Blakely's 'Zone of Visual Influence' plans provide any meaningful information and should not be relied on from a visual effects perspective.

11. Mr Blakey does not include a photograph of the subject area from within the Lake Alta cirque, or from any other alpine areas. We question where he has actually visited the Lake Alta area in undertaking his assessment.
12. Mr Blakey does acknowledged in part 2 of his report that the Lake Alta area is a classic Alpine basin which has a remote and backcountry character with high natural character values. We agree and consider the area is one of New Zealand's most accessible and valued alpine environments.
13. After undertaking a thorough review of the application, it is clear the proposal will be highly visible and visible on skyline as viewed from within the Lake Alta Basin. The proposal seeks a 7m high top terminal building (**Figure 1**) just above the existing Elevator and Escalator chutes (**Figure 2**). The application states that this will be located below the ridgeline. However, this is not correct as the ridgeline varies in height and to the east, is at a lesser elevation than to the south and west of the top station. The top station is proposed to be 7m above 1,986 masl. In reading the contours in the Southern Land documents, it appears that the proposed base level of the top station is the same as the subtle saddle, southeast of the proposed top terminal (**Figures 3 and 4**). Views of the ridgeline from the Lake Alta Basin and trail are through this saddle. It is clearly obvious that the proposed top terminal and associated earthworks, chairs, pylons and activity will be highly visible on skyline (**Figures 5 - 7**) as viewed from what the applicant's landscape architect calls a classic Alpine basin which has a remote and backcountry character with high natural character values.
14. We consider this will result in a very high adverse effect and that the proposal should be denied solely on this significant adverse effect. We accept that there is an ability to modify the proposal, and lower the proposed top station and earthworks, such that the highly visible ridgeline which holds the Alta Basin is not adversely affected. However, any modification to the proposal should be supported with detailed visual effects assessment and evidence-based methodology which definitively concludes that the proposed infrastructure and earthworks will not be visible on skyline or otherwise adversely affect the Lake Alta Basin.

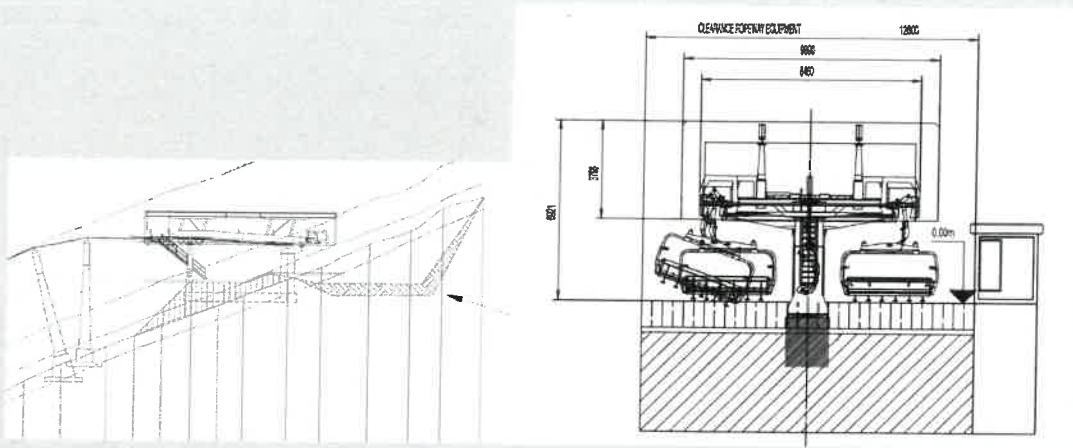


Figure 1: Elevations of proposed top chairlift terminal.



Figure 2: NZSki's map of the chutes. The proposed top terminal will be located on the skyline above Escalator and Elevator chutes.



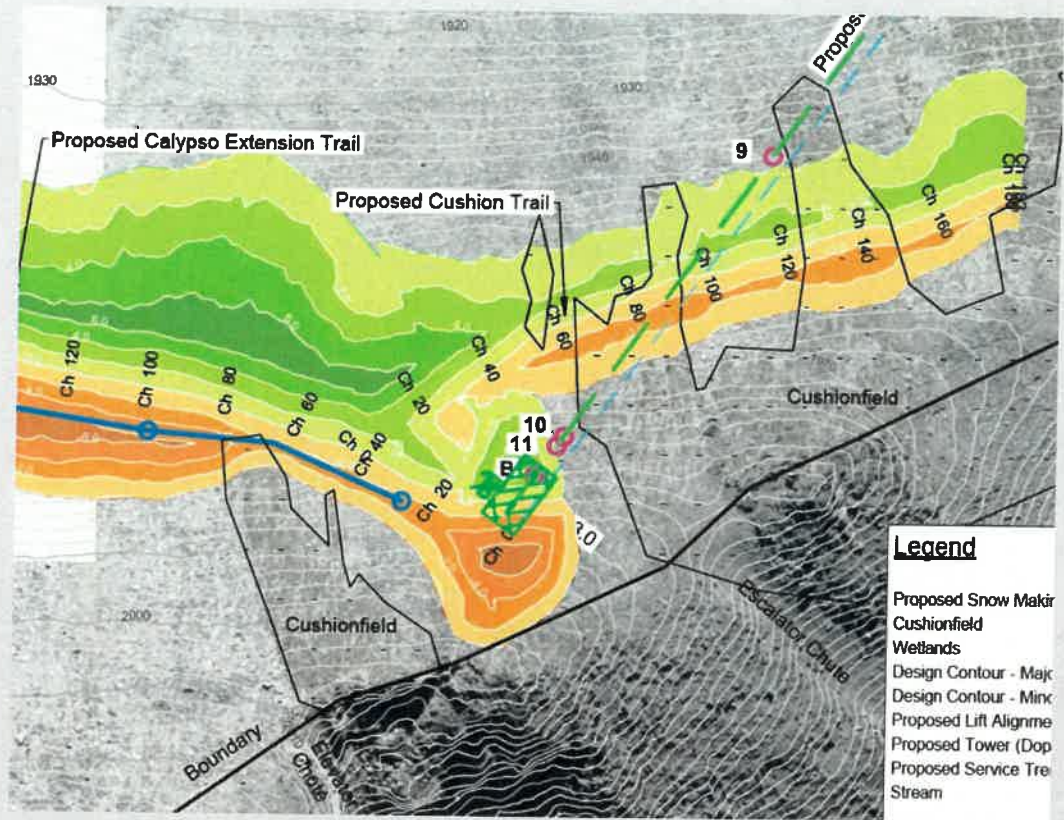


Figure 3: Proposed Earthworks.



Figure 4: This plan demonstrates the base of the proposed top terminal will be located at the approximate elevation of the top of Escalator chute, rendering the top station and associated structures and activities highly visible from the Lake Alta Basin and surrounds.



Figure 5: On the Lake Alta trail where the proposed top station will be visible on skyline.



Figure 6: Near the top of the Lake Alta trail where the proposed top station will be visible on skyline.

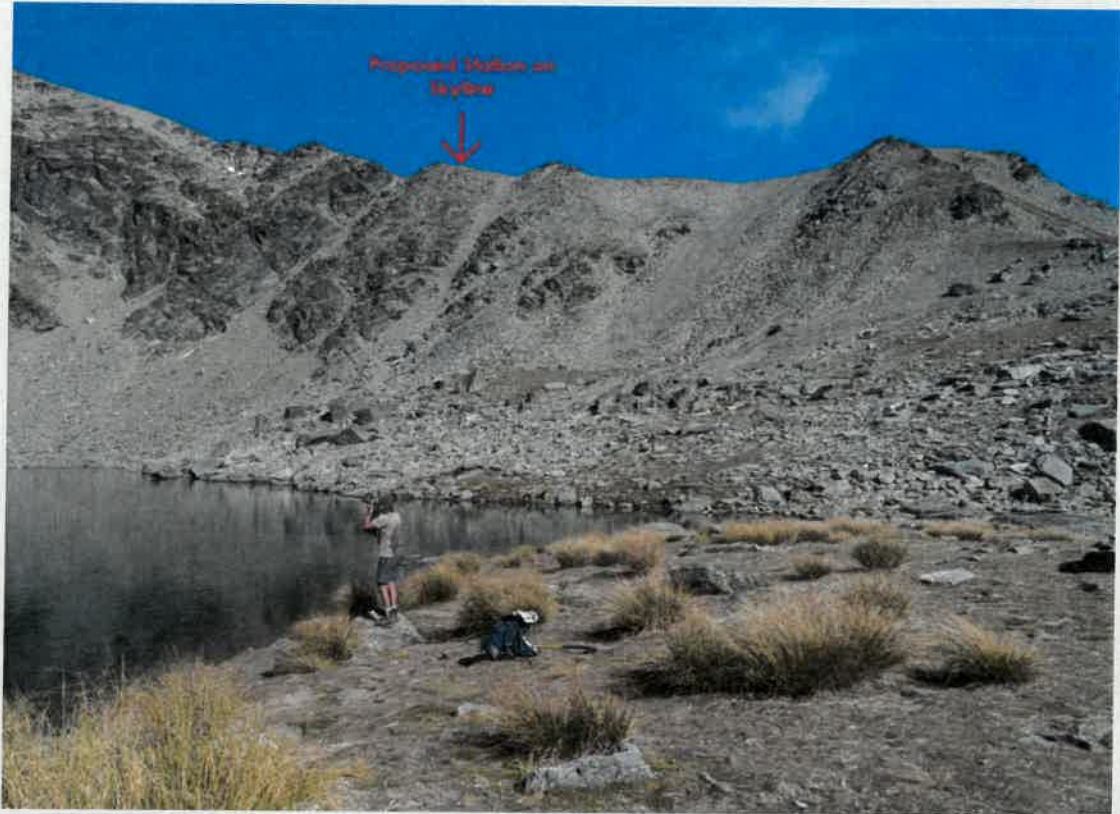


Figure 7: Near Lake Alta trail where the proposed top station will be visible on skyline.

15. Furthermore, the proposal will result in increased activity in the Lake Alta area by making the area more accessible. This will likely result in other effects during times of operation, including those associated with increased users, signs, ropes, gates and avalanche control.
16. We consider the proposal will result in significant adverse effects on the natural character, remoteness and scenic qualities of the Lake Alta Basin. The greatest effect perpetuated by the earthworks and proposed structure which will be visible on skyline as viewed from with the Lake Alta Basin. We considered the proposal should be refused on this basis alone.

#### *Shadow Basin*

17. While it is accepted that with the SASZ lift structures and some earthworks are anticipated, we consider the proposed earthworks will result in significant modification of a highly natural slope. The north facing slope is a highly natural talus and cushion field slope which is highly visible and forms part of a natural and scenic basin. We consider the proposed earthworks, including those associated with the construction of the lift, will result in significant adverse effects on the visual amenity and natural character of Shadow Basin (Figure 8).

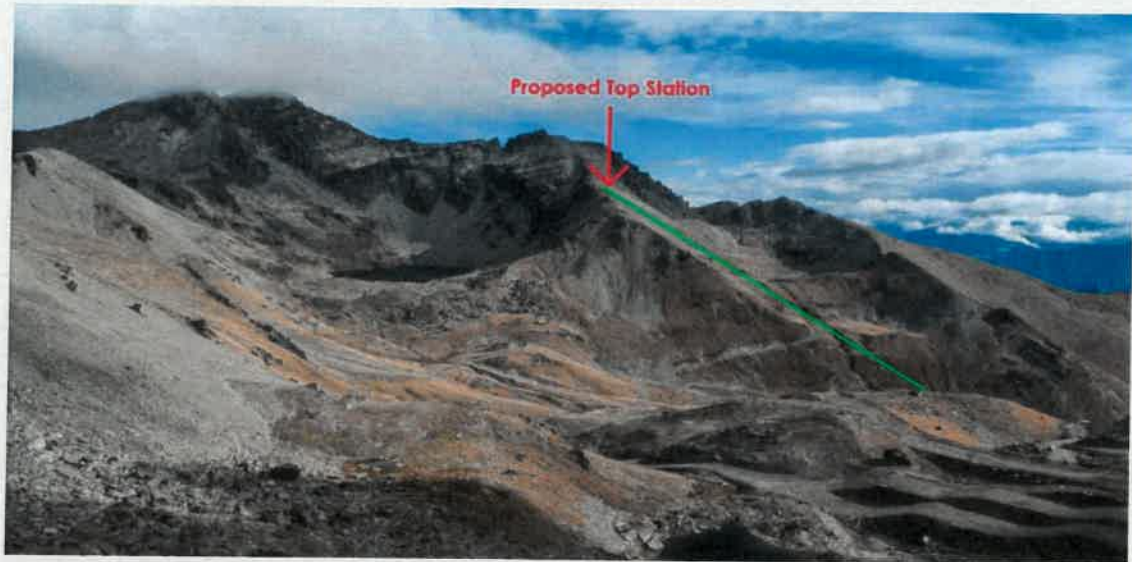


Figure 8: The approximate location of the proposed lift line in green.

### *Wakatipu Basin*

18. While some of the existing ski area infrastructure is visible from within the Wakatipu Basin, the proposal seeks to modify a highly visible slope and ridgeline. We consider the pylons, top station and new ski trails would be highly visible from distant places and will represent a significant change in the visual amenity and scenic quality of the Remarkable as viewed from distant parts of the Basin (**Figure 9**). We consider this will represent a moderate adverse effect on visual amenity and natural character of the highly valued Remarkable mountains.



Figure 9: View of the Remarkables from within the Wakatipu Basin. The proposed lift line is indicated in green and earthworks areas are shown in red.

## OTHER MATTERS

### *Access*

19. The Remarkables holds very high recreation values. Activities such as mountaineering, ski touring and snow shoeing are seeing a steady increase in New Zealand. The Remarkables is known as one of the best and most accessible alpine terrains to experience these outdoor activities in New Zealand. In winter more and more people are turning to ski touring and snow shoeing instead of buying ski passes and the Remarkables, particularly the Lake Alta basin, Wye Creek area and The Doolans catchment are popular backcountry areas to recreate.
20. This NZSKI submission omits to consider these other users which will be affected. The effect on other users is generally related to NZSki's Health and Safety management plans which it employs so it can undertake its commercial activities (avalanche control, winch cat grooming, snowmobile movements, etc.). Intensification of the Shadow Basin area will likely result in further restrictions to users of the area. We note that Shadow Basin provides access to the country's most valued alpine climbing venue, the West Face of the Remarkables. Shadow Basin is also the starting point for the Grand Traverse, one of the most valued alpine traverses in the southern hemisphere.
21. Also, outdoor recreation opportunities such as ski touring, snow shoeing and mountaineering will be at threat around Lake Alta as thousands more NZSki skiers will come down from the top of the chairlift to Lake Alta, resulting in potential user conflicts and degrading remoteness and scenic values. Further encroachment into public land from NZSki will change the wintertime experience of the Lake Alta Basin and future generations will not know the basin as a relatively quiet and undisturbed, alpine environment. The many local, national and international students (From Wakatipu High School, Cromwell College, Mount Aspiring College, Dunstan College) who spend their winter weekends with their school involved in outdoor recreation and education activities around Lake Alta, Wye Creek and the Doolans will see this very beneficial experience adversely effected.
22. Other concessionaires will also see their product affected, as there will be a very certain change to the ambiance of Lake Alta and its surrounding.

### *Climate Change*

23. NZSki's application fails to consider the future of the snowsport industry in the face of climate change. International studies and articles show that climate change may lead to the end of ski resorts. Winter as we know it will change and we consider advancing ski area infrastructure, especially that which will result in significant adverse effects such as the subject proposal, should address the reality of climate change.

24. The latest, local victim of climate change is the Ruapehu ski fields (Stuff article [here](#)), there is great uncertainty for the future of Whakapapa and Tūroa after having closed down in 2022 due to lack of snow.
25. The facts are obvious:
- 2022 was the warmest winter on record in New Zealand according to Niwa and their latest [report](#).
  - Overseas ski fields are closing down and by filing bankruptcy communities are forced to pay the bills to dismantle ski field infrastructures as shared in this [article](#).
  - Snow is becoming unreliable due to higher temperatures and ski seasons are very unpredictable.
  - Conservative estimates predict that the majority of ski resorts won't be able to open by the year 2090, just over 70 years away. Our grandchildren might have limited to no opportunities to slide on snow far before they hit retirement age.
26. We consider additional ski area infrastructure, such as that proposed, will result in significant adverse effects on the Remarkables which will be irreversible and that in the face of climate change, the ski area infrastructure will not support any viable future activities. The addition of a chairlifts and change of landscape, including disturbance of fauna and flora is unjustified when faced with the uncertain future of the skiing industry.

## CONCLUSION

27. While NZSki positively contributes to the community in many ways, we consider this application will result in significant adverse effects on the natural, scenic and remoteness qualities of the Remarkables and will adversely affect the communities that use the highly valued Remarkables alpine environment. We understand it is DOC's duty to 'foster' recreation while 'allowing' tourism and consider the proposal will be contrary to the [DOC purpose and outcomes](#).
28. The Remarkables area is a finite place and we consider the proposal crosses the threshold to which the natural, scenic and remote values of this highly unique and highly valued alpine environment will be irreversibly degraded.
- We would like to be heard at the hearing to further share our concerns on this submission.

Ngā mihi,

Mr Oli Austin – President of the Queenstown Climbing Club

Prepared by the Committee of the Queenstown Climbing Club.

My reasons for my objection or submission are:

Please, refer to the reasons for our objections in the details above.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Prevent any further development in the Remarkables area such as in this case the building of this chairlift including all earthwork associated with this proposal. All details can be found above.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
QCC PRN Remarks Shadow replacement submission 280123 FINAL	PDF	Details about objection against the proposal of a new/realignment of a chairlift on the Shadown Basin Area and related earthwork.

### How do I submit my objection or submission?

Complete this form and email to [DNSubmissions@doc.govt.nz](mailto:DNSubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Ōtepoti / Dunedin Service Centre, PO Level 1, John Wickliffe House, 265 Princes Street, Ōtepoti / Dunedin 9016. Attention: Kelvin Brown.

**Application For A Concession By NZSki Limited For A Lease, Licence And Easement Within The Rastus Burn Recreation Reserve To Replace And Realign The Existing Shadow Basin Passenger Lift System And Associated Infrastructure Within The Rastus Burn Recreation Reserve**

**Submission in opposition by:**

**Queenstown Climbing Club**

28 January 2023

**INTRODUCTION**

1. The Queenstown Climbing Club (QCC) has over 4100 members, many of which spend a considerable amount of time in the Remarkables and wider Tapuae-o-Uenuku / Hector Mountains. Our members are avid recreationalists who participate in climbing, mountaineering, ski touring, hiking, camping and other outdoor activities in the subject area.
2. Central to the club's values is Kaitiakianga; the guardianship and care for the environment that sustains us, physically and emotionally. QCC has a historied and successful list of projects which support our role as guardian, including projects which involve native planting, removal of wilding pines and pest control. We maintain healthy and collaborative relationships with stakeholders who manage the lands we use (DOC, QEII, QLDC, and private owners).
3. QCC has observed the incremental impact on the Rastus Burn Recreation Reserve perpetuated by NZSki Limited (NZSki). While QCC values the contribution NZSki makes to recreational values, especially those associated with snow sports, they have also reduced public access to our public lands. This includes limiting the public access to the reserve or across the Ski Area Sub-Zone (SASZ) to enable NZSki to carry out their commercial activities, the closing of the access road during times of the year for their own purposes (such as construction) and now, the toll to use the road in summertime. We have worked with NZSki in many ways, but we are seriously concerned how further incremental change will limit public accesses to our public lands.
4. We have significant concerns with regard to NZSki's current proposal. QCC does not support NZSki's proposal for the following reasons:
  - The proposal is pre-emptive to.
    - (i) The reclassification of the Kawarau / Remarkables Conservation Area reclassification



(ii) The renewal of NZSki's Head Lease, which we understand expired 1 March 2022.

- The proposal would result in adverse effects on natural character, remoteness and visual amenity values with particular regard to adverse effects on the Lake Alta Cirque.
- The proposal will further limit public access to and enjoyment of public land.
- The proposal does not recognise the effects of climate change.

#### **THE KAWARAU / REMARKABLES CONSERVATION AREA RECLASSIFICATION PROCESS**

5. DOC is currently reviewing the classification of the Kawarau / Remarkables Conservation Area. This reclassification process aims to better '*recognise and protect conservation and cultural values on the Kawarau / Remarkables Conservation Area*'. The DOC driven process recently received submissions on key questions about the future of the Remarkables. The SASZ forms part of the Rastus Burn Recreation Reserve which is in the larger Kawarau / Remarkables Conservation Area. The much larger Kawarau / Remarkables Conservation Area is currently classified as Stewardship land. However, it is very likely the area will be up-classified. The QCC submitted that the area should become a National Park. We consider the Kawarau / Remarkables Conservation Area is an area of extremely high scenic, natural, remote and recreational value.
6. QCC considers the DOC reclassification a significant piece of work which represents public interest in our nations valuable land assets. We regard this process should be completed prior to the consideration of any further development within the Kawarau / Remarkables Conservation Area, regardless of whether it is in a SASZ or not.
7. We also understand NZSki's Head Lease expired 1 March 2022. We are not aware of any renewal of that lease or the terms of which that has been, or is being considered.

## **ADVERSE EFFECTS ON NATURAL CHARACTER, REMOTENESS AND VISUAL AMENITY VALUES**

### *Lake Alta Basin*

8. We consider there are significant short comings and oversights in the Landscape and Visual Assessment prepared by Phillip Blakely. The most significant is Mr Blakey's avoidance of addressing adverse effects of the proposal on the Lake Alta cirque.
9. In part 4.2 Mr Blakley describes his methods of determining the proposal's visibility through the use of 20m and 50m contours as well as on the ground observation. We consider the use of 20m contour data sets not sufficient for determining the visibility of the proposal, particularly in the localised context. It is clear 1m contours are available as they are provided for in the applicants earthworks plans.
10. It is also unclear whether Mr Blakey has assessed the effects of the proposed earthworks or an approximately 7m high top station, which is proposed to be located near a prominent ridge. We do not consider Mr Blakely's 'Zone of Visual Influence' plans provide any meaningful information and should not be relied on from a visual effects perspective.
11. Mr Blakey does not include a photograph of the subject area from within the Lake Alta cirque, or from any other alpine areas. We question where he has actually visited the Lake Alta area in undertaking his assessment.
12. Mr Blakey does acknowledged in part 2 of his report that the Lake Alta area is a classic Alpine basin which has a remote and backcountry character with high natural character values. We agree and consider the area is one of New Zealand's most accessible and valued alpine environments.
13. After undertaking a thorough review of the application, it is clear the proposal will be highly visible and visible on skyline as viewed from within the Lake Alta Basin. The proposal seeks a 7m high top terminal building (**Figure 1**) just above the existing Elevator and Escalator chutes (**Figure 2**). The application states that this will be located below the ridgeline. However, this is not correct as the ridgeline varies in height and to the east, is at a lesser elevation than to the south and west of the top station. The top station is proposed to be 7m above 1,986 masl. In reading the contours in the Southern Land documents, it appears that the proposed base level of the top

station is the same as the subtle saddle, southeast of the proposed top terminal (Figures 3 and 4). Views of the ridgeline from the Lake Alta Basin and trail are through this saddle. It is clearly obvious that the proposed top terminal and associated earthworks, chairs, pylons and activity will be highly visible on skyline (Figures 5 - 7) as viewed from what the applicant's landscape architect calls a classic Alpine basin which has a remote and backcountry character with high natural character values.

14. We consider this will result in a very high adverse effect and that the proposal should be denied solely on this significant adverse effect. We accept that there is an ability to modify the proposal, and lower the proposed top station and earthworks, such that the highly visible ridgeline which holds the Alta Basin is not adversely affected. However, any modification to the proposal should be supported with detailed visual effects assessment and evidence-based methodology which definitively concludes that the proposed infrastructure and earthworks will not be visible on skyline or otherwise adversely affect the Lake Alta Basin.

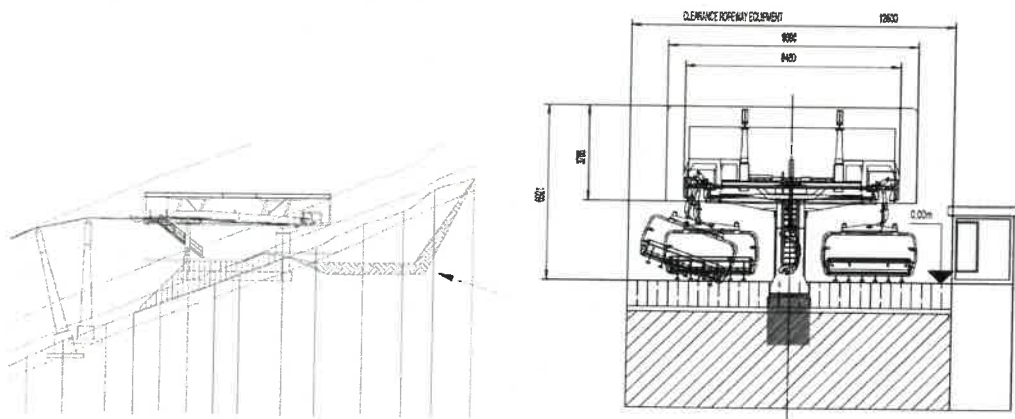


Figure 1: Elevations of proposed top chairlift terminal.



Figure 2: NZSki's map of the chutes. The proposed top terminal will be located on the skyline above Escalator and Elevator chutes.

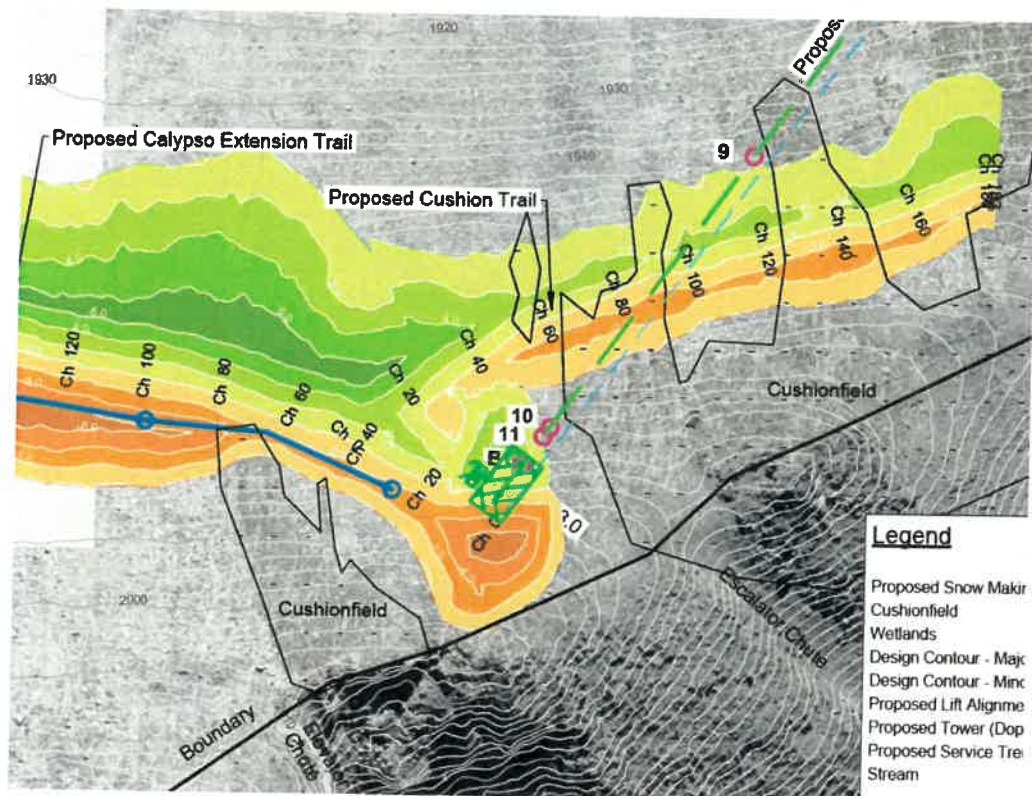


Figure 3: Proposed Earthworks.



Figure 4: This plan demonstrates the base of the proposed top terminal will be located at the approximate elevation of the top of Escalator chute, rendering the top station and associated structures and activities highly visible from the Lake Alta Basin and surrounds.

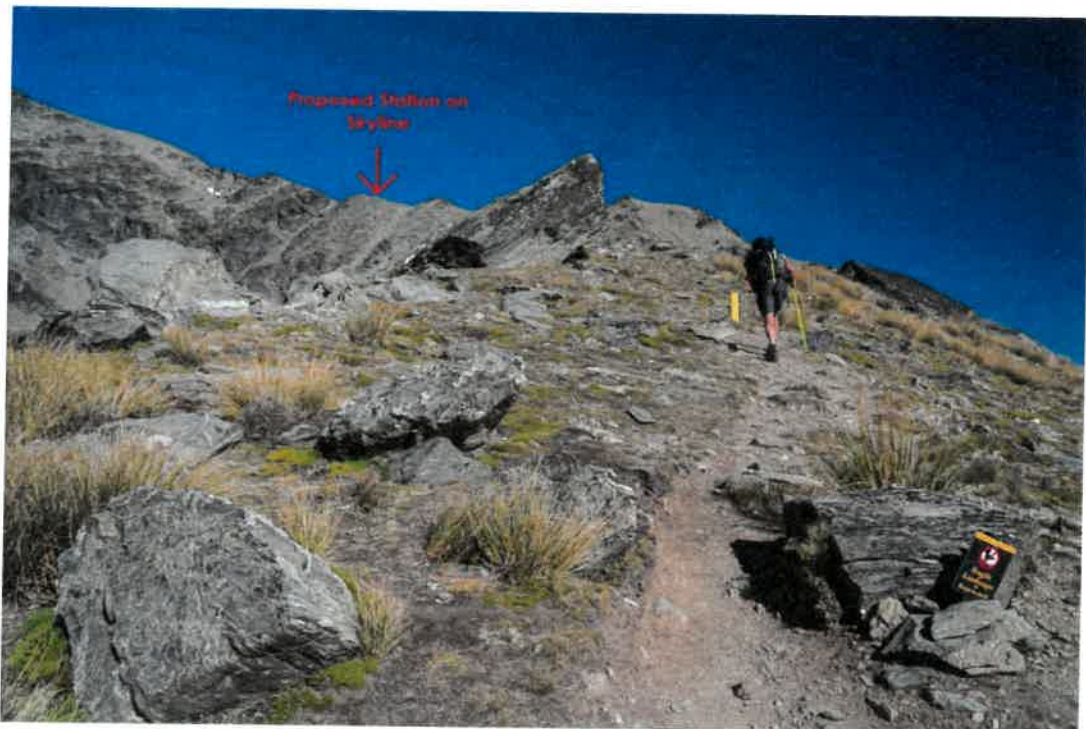


Figure 5: On the Lake Alta trail where the proposed top station will be visible on skyline.

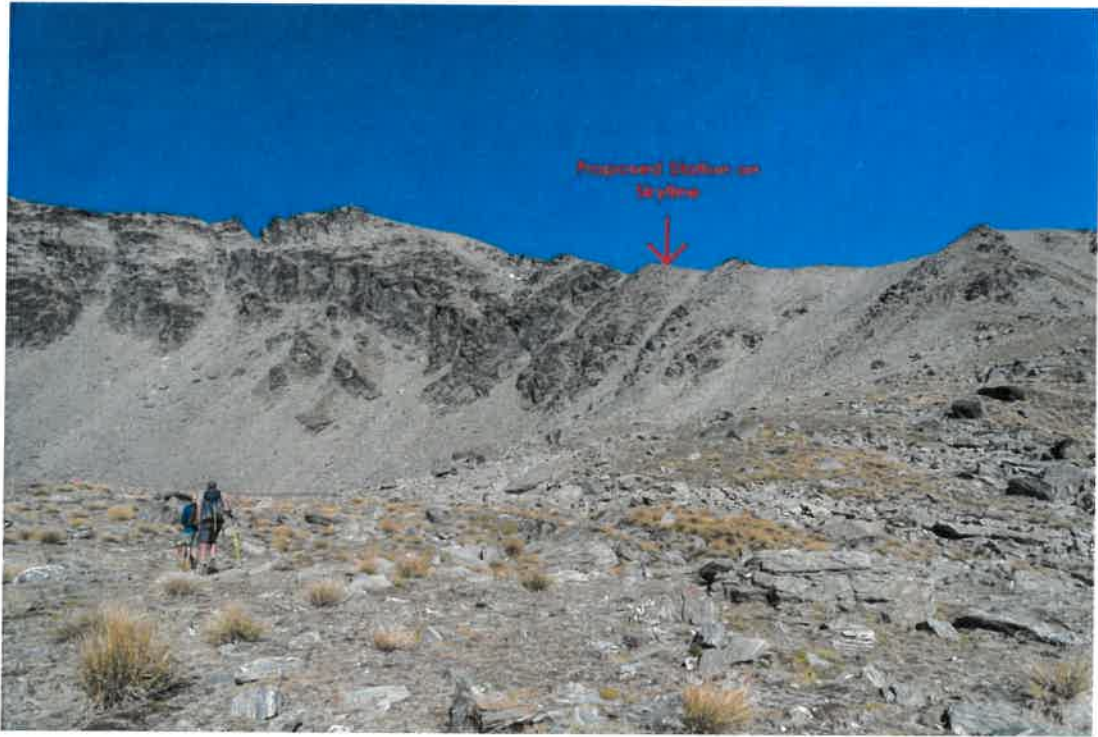


Figure 6: Near the top of the Lake Alta trail where the proposed top station will be visible on skyline.

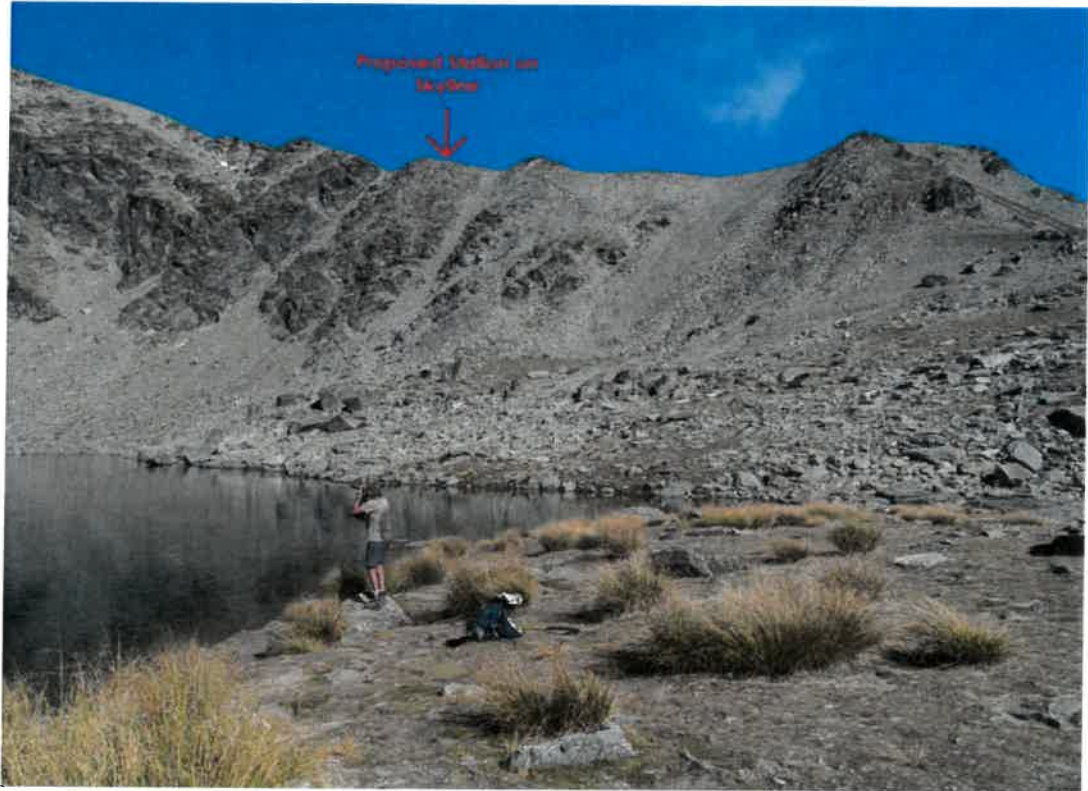


Figure 7: Near Lake Alta trail where the proposed top station will be visible on skyline.

15. Furthermore, the proposal will result in increased activity in the Lake Alta area by making the area more accessible. This will likely result in other effects during times of operation, including those associated with increased users, signs, ropes, gates and avalanche control.
16. We consider the proposal will result in significant adverse effects on the natural character, remoteness and scenic qualities of the Lake Alta Basin. The greatest effect perpetuated by the earthworks and proposed structure which will be visible on skyline as viewed from with the Lake Alta Basin. We considered the proposal should be refused on this basis alone.

### *Shadow Basin*

17. While it is accepted that with the SASZ lift structures and some earthworks are anticipated, we consider the proposed earthworks will result in significant modification of a highly natural slope. The north facing slope is a highly natural talus and cushion field slope which is highly visible and forms part of a natural and scenic basin. We consider the proposed earthworks, including those associated with the construction of the lift, will result in significant adverse effects on the visual amenity and natural character of Shadow Basin (Figure 8).

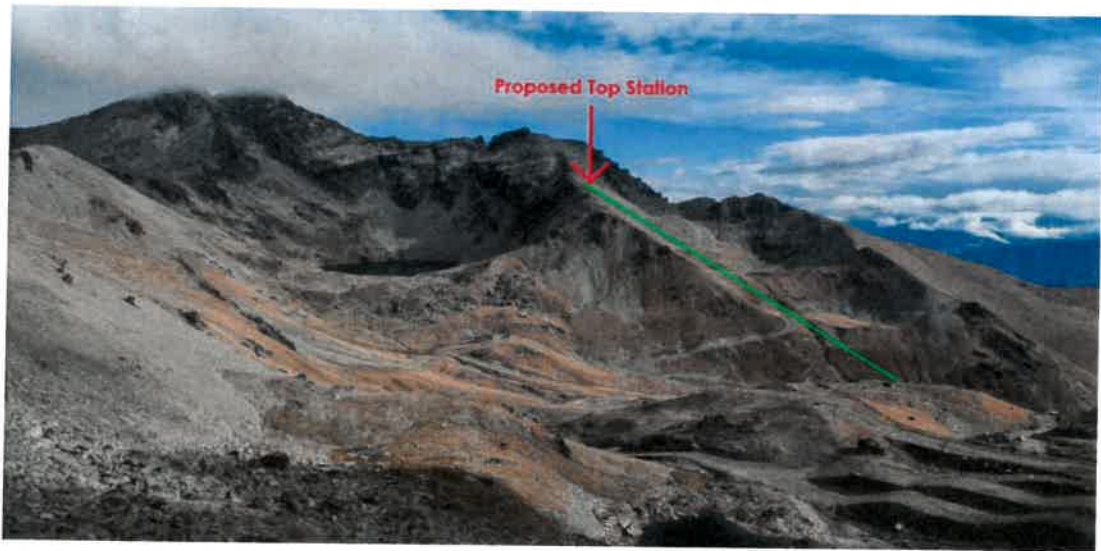


Figure 8: The approximate location of the proposed lift line in green.

### *Wakatipu Basin*

18. While some of the existing ski area infrastructure is visible from within the Wakatipu Basin, the proposal seeks to modify a highly visible slope and ridgeline. We consider the pylons, top station and new ski trails would be highly visible from distant places and will represent a significant change in the visual amenity and scenic quality of the Remarkable as viewed from distant parts of the Basin (Figure 9). We consider this will represent a moderate adverse effect on visual amenity and natural character of the highly valued Remarkable mountains.





Figure 9: View of the Remarkables from within the Wakatipu Basin. The proposed lift line is indicated in green and earthworks areas are shown in red.

## **OTHER MATTERS**

### *Access*

19. The Remarkables holds very high recreation values. Activities such as mountaineering, ski touring and snow shoeing are seeing a steady increase in New Zealand. The Remarkables is known as one the best and most accessible alpine terrains to experience these outdoor activities in New Zealand. In winter more and more people are turning to ski touring and snow shoeing instead of buying ski passes and the Remarkables, particularly the Lake Alta basin, Wye Creek area and The Doolans catchment are popular backcountry areas to recreate.
20. This NZSKI submission omits to consider these other users which will be affected. The effect on other users is generally related to NZSki's Health and Safety management plans which it employs so it can undertake its commercial activities (avalanche control, winch cat grooming, snowmobile movements, etc.). Intensification of the Shadow Basin area will likely result in further restrictions

to users of the area. We note that Shadow Basin provides access to the countries most valued alpine climbing venue, the West Face of the Remarkables. Shadow Basin is also the starting point for the Grand Traverse, one of the most valued alpine traverses in the southern hemisphere.

21. Also, outdoor recreation opportunities such as ski touring, snow shoeing and mountaineering will be at threat around Lake Alta as thousands more NZSki skiers will come down from the top of the chairlift to Lake Alta, resulting in potential user conflicts and degrading remoteness and scenic values. Further encroachment into public land from NZSki will change the wintertime experience of the Lake Alta Basin and future generations will not know the basin as a relatively quiet and undisturbed, alpine environment. The many local, national and international students (From Wakatipu High School, Cromwell College, Mount Aspiring College, Dunstan College) who spend their winter weekends with their school involved in outdoor recreation and education activities around Lake Alta, Wye Creek and the Doolans will see this very beneficial experience adversely effected.
22. Other concessionaire will also see their product affected, as there will be a very certain change to the ambiance of Lake Alta and its surrounding.

#### *Climate Change*

23. NZSki's application fails to consider the future of the snowsport industry in the face of climate change. International studies and articles show that climate change may lead to the end of ski resorts. Winter as we know it will change and we consider advancing ski area infrastructure, especially that which will result in significant adverse effects such as the subject proposal, should address the reality of climate change.
24. The latest, local victim of climate change is the Ruapehu ski fields (Stuff article [here](#)), there is great uncertainty for the future of Whakapapa and Tūroa after having closed down in 2022 due to lack of snow.

25. The facts are obvious:

- 2022 was the warmest winter on record in New Zealand according to Niwa and their latest [report](#).
- Overseas ski fields are closing down and by filing bankruptcy communities are forced to pay the bills to dismantle ski field infrastructures as shared in this [article](#).
- Snow is becoming unreliable due to higher temperatures and ski seasons are very unpredictable.
- Conservative estimates predict that the majority of ski resorts won't be able to open by the year 2090, just over 70 years away. Our grandchildren might have limited to no opportunities to slide on snow far before they hit retirement age.

26. We consider additional ski area infrastructure, such as that proposed, will result in significant adverse effects on the Remarkables which will be irreversible and that in the face of climate change, the ski area infrastructure will not support any viable future activities. The addition of a chairlifts and change of landscape, including disturbance of fauna and flora is unjustified when faced with the uncertain future of the skiing industry.

## CONCLUSION

27. While NZSki positively contributes to the community in many ways, we consider this application will result in significant adverse effects on the natural, scenic and remoteness qualities of the Remarkables and will adversely affect the communities that use the highly valued Remarkables alpine environment. We understand it is DOC's duty to 'foster' recreation while 'allowing' tourism and consider the proposal will be contrary to the [DOC purpose and outcomes](#).

28. The Remarkables area is a finite place and we consider the proposal crosses the threshold to which the natural, scenic and remote values of this highly unique and highly valued alpine environment will be irreversibly degraded.

We would like to be heard at the hearing to further share our concerns on this submission.

Ngā mihi,

Mr Oli Austin – President of the Queenstown Climbing Club

Prepared by the Committee of the Queenstown Climbing Club.

**OBJECTION OR SUBMISSION**

Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Ken McIntyre, Outdoor Recreation teacher Wakatipu High School.
Contact person and role of organisation	<i>Ken McIntyre Teacher in charge Outdoor Recreation</i>
Email (Communication from DOC will be via email unless alternate contact requested)	kmcintyre@wakatipu.school.nz
Alternate contact for all DOC communication	As above
Phone/Mobile	0274737688
Postal Address and Post Code	9 Goldleaf Hill, Queenstown 7300

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Ken McIntyre
Organisation	Individual and Wakatipu High School
Date	30/1/23

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The upgrading and realigning of the Shadow Basin chair lift.

My reasons for my objection or submission are:

My main concerns are from the point of view of a teacher who uses adjacent areas of the Rastus Burn/Remarkables ski and recreational reserve for student centred activities in winter – mountain expedition training and practice including overnight camping (in tents and snow shelters). I am concerned that the Shadow Basin realignment will significantly increase the ski and riding traffic in the areas that we use for our outdoor recreational activities. We have been using snow drifts and slopes for camping and snow shelter construction since 2000 and have seldom had any major interference from skiers and riders in our specific sites (above the Alta chair and near the outlet of Lake Alta). The realignment (of the Shadow Basin chair) will add considerably to the numbers of skiers and riders using the Alta chutes and adjacent slopes as it will be mostly be skiable terrain once you get off the top of the new realigned chair with little walking if any required!

Increasing/improving the access to the Alta chutes-Lake Alta would further detract from the more remote feel that currently exists in the Lake Alta basin. Also, there is more potential collision conflict with those increased skier/rider numbers and the more passive snow craft participants.

I am aware that the ski field has now been in operation for nearly 40 years and as a submitter opposed to the original consent to operate, I can also see the benefits of the ski field for access to the Rastus burn/Lake Alta area. However, it does concern me that there has been more and more modification of the area and this is seldom able to be effectively hidden-preserved.

Thank you for your time,

Regards Ken McIntyre

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Hard to say but ideally the only way is to decline it

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

Complete this form and email to [DNSubmissions@doc.govt.nz](mailto:DNSubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Ōtepoti / Dunedin Service Centre, PO Level 1, John Wickliffe House, 265 Princes Street, Ōtepoti / Dunedin 9016. Attention: Kelvin Brown.

**OBJECTION OR SUBMISSION**Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

**A. Permission Application Number and Name of Applicant**

100472-OTH: NZSki Limited

**B. Name of Proposed Activity and Location**

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

**C.1 Objector or Submitter Information-**

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	UphighNZ
Contact person and role of organisation	<i>Guillaume Charton</i>
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	[REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.





## A. Permission Application Number and Name of Applicant

100472-OTH: NZSki Limited

## B. Name of Proposed Activity and Location(s)

Proposed 40-year term concession (lease and licence and easement) to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure at the Remarkables Ski Area within the Rastus Burn Recreation Reserve, Queenstown.

### C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Guillaume Charton
Organisation	UphighNZ
Date	30/01/2023

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The realignment / the new chairlift in Shadow Basin (Rastus Burn Recreational Reserve)

My reasons for my objection or submission are:

TO: Department of Conservation (DOC).

Tēnā koe,

UphighNZ which is an outdoor instructions, film and pictures business operating in the Whakatipu Basin thank you for the opportunity to submit on the concession as stated above and which has been made by NZSki Ltd. Please note that UphighNZ is a local company based in Jacks Point on the foot of Kawarau / The Remarkables and has written 3 books about mountaineering, rock and ice climbing in the Wakatipu region. These books have sold in outdoor shops in New Zealand. Further 7 movies have been selected as finalist in the New Zealand Mountain and Film Festival over the last 15 years. Several of these movies tell the story of outdoor adventures around the Remarkables.

We have several points in this submission that we would like to raise in objection of this new chairlift:

- We note that NZSki's concession has failed to be renewed (start of 2022) and therefore this proposal should be denied and not processed on this basis. This proposal is lawfully questionable.
- Kawarau / The Remarkables Reclassification process started in 2020 and because of this important process taking place next to the proposed chairlift there should not be any proposals accepted (such as this one) which would affect (environmentally, visually etc.) the future National Park or Conservation Park. It is worth asking: what impact would the presence of a growing commercial business such as NZSki on the doorstep have on the Kawarau Remarkables chance of being reclassified as a national park?
- We believe that NZSKI's proposal is inappropriate considering the reclassification of the area next to the chairlift and the renewal of NZSKI concession.
- The proposed location of this chairlift reaching the vicinity of the ridge line would be the highest and the first of its kind in the Wakatipu. Because of its location this will have localised, regional effects which would affect the natural environment and its recreational users who head to the Remarkables, which is public and conservation land, for the very reason to enjoy what the Remarkables have on offer: a true natural alpine environment and one of the best of its kind in New Zealand.
- The proposed location of the chairlift has been well thought by NZSki, as this would mean that thousands of NZSki clients would be able to access right from the top of the chairlift the Lake Alta cirque but also the West ridge of the Remarkables which are both known as very fragile and quiet environments and which are in the conservation area. This would have permanent impact on the fragile alpine eco system, the fauna and its flora. This serious threat to the endemic plants and birds found around the lake is concerning and goes against DOC identified outcomes.
- The proposed location of the chairlift would mean that from around Lake Alta (Remarkables Conservation Area) summer and winter hikers would have their 'natural' views disintegrated by a man made structure towering up high on the ridge line. The feeling of wilderness by other users around Lake Alta will be highly impacted. The local schools who take their students in outdoor education adventures and overnight at the Lake will see their experience and education highly impacted.

- The slopes below the chairlift on the Lake Alta and Shadow Basin sides being fragile rock screes featuring fragile alpine plants and hosting alpine insects and birds would be impacted by future skiers in winter but also by snow management (avalanche control bombing, snow machine, snow guns and all the infrastructures). Not only the alpine will be environmental but also visual from the Lake but also as far as from Arrowtown, and around the basin. In night-time snow management and other NZSki activities would beam light and sound across to the quiet and fragile Lake Alta environment and this is of great concern.



- There is a strong argument against this proposal because NZSki is already going beyond what the natural and public environment can provide. The water used out of Lake Alta by NZSKI is beyond reasonable and with this new large development of new skiing slopes more will be taken of Lake Alta. From The Guardian: "...nor is artificial snow likely to provide much relief: a recent study by the University of Basel calculated that the water consumption of ski resorts who turn to snow canon could rise by an unsustainable 80%". In the case of adding another chairlift and more slopes there would be a clear increase demand of snow making and of water which would be addition to the ever-increasing water needs on the ski field.
- By adding a new chairlift and a new skiing area NZSki will put even more pressure on infrastructures that are already at capacity and not adequate (car parking, roading, transport, water and electricity). This has had already serious repercussions on the community with traffic jams going all the way down to Frankton in 2021.
- Access: With winches (for snow machines), snow guns, avalanche control (bombing) on the slope around the proposed chairlift, access to the ridge line of the Remarkables will be compromised and climber and hikers wishing to head to the nationally and internationally known Grand Traverse of the Remarkables and its West Face will see this opportunity disappearing. To note that these users need to hike up as early as 5am for safety reasons (snow conditions).
- Note that the Queenstown Lakes District Council has recently declared a climate emergency. Further, global warming is becoming more prevalent (from Niwa: *2022 surpassed the record set in 2021 by a "significant" 0.2C, and not a single month of last year was below average*) around New Zealand. This means that snow falls are becoming so unreliable that further changing the landscape around a fragile alpine environment for 3 months of the year for possible only 40 more years of use is very contestable.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Review proposal while considering the points above.

## G. Attachments

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1 February 2023

Director-General  
Department of Conservation | Te Papa Atawhai

By email: [dnsubmissions@doc.govt.nz](mailto:dnsubmissions@doc.govt.nz)

Tēnā koe,

### **NZSki Limited Remarkables Shadow Basin Concession Application**

Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) provides the following response to the concession application by NZSki Limited (**NZSki**), which was publicly notified by the Department of Conservation (**the Department**) under section 17SC of the Conservation Act 1987 (**the Act**).

The concession application is for a lease, licence and easement to replace and realign the existing Shadow Basin passenger lift system and associated infrastructure within the Rastus Burn Recreation Reserve. The proposed term of the concession is 40 years.

Te Rūnanga was disappointed to learn of this concession application from third parties instead of receiving direct engagement from the Department about it.

Te Rūnanga has been engaging with the Department for some time in relation to its approach to issuing concessions within the Ngāi Tahu Tākiwa. Te Rūnanga remains concerned that the Department's approach does not reflect its obligations under section 4 of the Conservation Act 1987 (**section 4**).

Te Rūnanga has clearly and repeatedly conveyed its view on how the Department should interpret and apply section 4 in concessions management, as affirmed by the Supreme Court in its decision *Ngāi Tai ki Tāmaki v Minister of Conservation* [2018] NZSC 122 (the **Ngai Tai decision**). We consider that the tenets from the Ngai Tai decision are the start-point and primary consideration for the Department's approach to concessions.

The Remarkables mountain range is an area of great significance to Ngāi Tahu. The Conservation Area is a tangible and intangible representation of Ngāi Tahu whakapapa with Ngā Puna Wai Karikari a Rākaihautū having been shaped by Rākaihautū, with the two mountain ranges of the Conservation Area, Kawarau and Tāpuae-o-Uenuku, also named after our tūpuna.

This whakapapa connection with the archaeological, written and oral records enables the exchange, expression and recognition of Ngāi Tahu mātauranga tuku iho. It provides an ongoing presence of the mana of Ngāi Tahu in its takiwā.

The term of the proposed concessions is very lengthy - 40 years. A decision to grant the concessions to NZSki will, therefore, prevent Ngāi Tahu from connecting to, or benefiting from, that part of their tākiwa through the concession for several generations. NZSki has already had the benefit of these concessions for a significant period. The effect will be that Ngāi Tahu – who have already been prevented from connection with, or benefiting from, this area through the concession for decades – will be locked out for another generation. While an immediate active participation interest may not exist at this present point in time, this may not always be the case.


Decisions being made now in relation to concessions, favouring the incumbent and failing to consider Ngāi Tahu interests in a section 4 compliant manner, will result in adverse intergenerational impacts for Ngāi Tahu whānui. We have previously asserted our view that until a section 4 compliant process is applied, concessions in areas of significance such as the Remarkables should be granted on a limited basis.

We also note that this term is far beyond what is generally permitted under section 17Z(3)(a)(c) of the Act. NZSki has explained in its application that the 40-year term is to recoup the cost of investing \$15 million on project. Te Rūnanga is not persuaded this is an exceptional reason.

For the reasons outlined above Te Runanga **do not support** the granting of the proposed concession for a term of 40 years.

Te Rūnanga does not wish to be heard in support of this submission.

Nāhaku noa, nā



**Jacqui Caine**  
Group Head – Strategy & Environment  
Te Rūnanga o Ngāi Tahu

Copy to:

Henry Weston, Deputy Director-General [heweston@doc.govt.nz](mailto:heweston@doc.govt.nz)