

Technical Memo

To:	QLDC Resource Consent Team
From:	Dom Harrison – Parks and Reserves
Date:	30 January 2026
Subject:	Fast-track Approvals Act 2024 (FTAA) – Technical Memorandum – Parks and Reserves Southern Infrastructure Limited - Queenstown Cable Car (FTRA2505)

1. EXECUTIVE SUMMARY

- 1.1. This memorandum provides Parks and Reserves (P&R) input to inform Queenstown Lakes District Council's (QLDC or Council) response to the expert panel under s17 of the Fast-track Approvals Act 2024 (FTAA) for the Queenstown Cable Car application by Southern Infrastructure Ltd (SIL) (FTRA2505).
- 1.2. The proposal would utilise a substantial amount of QLDC reserve land and land held for community/recreation purposes and includes the Queenstown Events Centre (QEC). The application has not demonstrated how the significant impacts on the existing reserve land and recreation use will be managed.
- 1.3. The occupation of entire recreation reserve parcels combined with inefficient alignment design that dissects existing QEC facilities (sports fields, golf course, hockey turfs) compromises the use of QLDC land for its existing primary purpose, community facilities.
- 1.4. The application has insufficient information. Whilst the limited use of some QLDC reserve land may be considered appropriate for a public transport system, the proposed significant use of reserve land isn't considered appropriate, and the applicant is advised to assess alternative alignments that avoid or limit the use of public reserve land and does not detract from reserve values. This is particularly critical if this proposal ends up not being a public transport system but a private commercial operation, where all use of, and impacts on, public reserves should be avoided.
- 1.5. Any use of QLDC reserve land, including QEC, will require Council approval, and in many situations will involve approval by elected members.
- 1.6. Approval under s176 of the RMA would also be required from the requiring authority (QLDC) for any land subject to a designation. This can only be given if the proposal does not hinder QLDCs ability to implement the works able to be done under the designation. This process is also separate to the FTAA.

2. Qualifications and Experience

- 2.1. This report was prepared by Dom Harrison, Parks and Reserves Planner at QLDC.
- 2.2. I hold a Bachelor of Applied Science in Environmental Management. I have three years of professional experience. I have been a Parks and Reserves Planner at QLDC

for one and a half years where responsibilities include the assessment of development proposals and effects on the reserve and recreation network.

- 2.3. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical report has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

3. INTRODUCTION

- 3.1. QLDC has been asked to provide comment on a referral application under the FTAA made by SIL(the applicant). The applicant has provided a description of the proposal in the document titled *Queenstown Cable Car Planning Report – Referral Application – Clean – 17.11*. A brief description of the activity for context is provided below.
- 3.2. The application proposes to construct a cable car network that extends from Ladies Mile and the Queenstown Airport, to Frankton and through to the Queenstown CBD via Queenstown Hill. A high-level overview of the proposed network is shown in Figure 1 below.
- 3.3. The network is proposed by the applicant as a Mass Rapid Transit system (MRT) to alleviate road congestion.
- 3.4. Parks and Reserves input is required as landowner (and the Requiring Authority) for the number of QLDC reserve parcels and the QEC impacted by the proposed cable car.
- 3.5. The QLDC reserves and QEC are proposed to accommodate a combination of cable car towers, stations, and other associated infrastructure such as servicing station, storage, carparking and ancillary commercial activities.

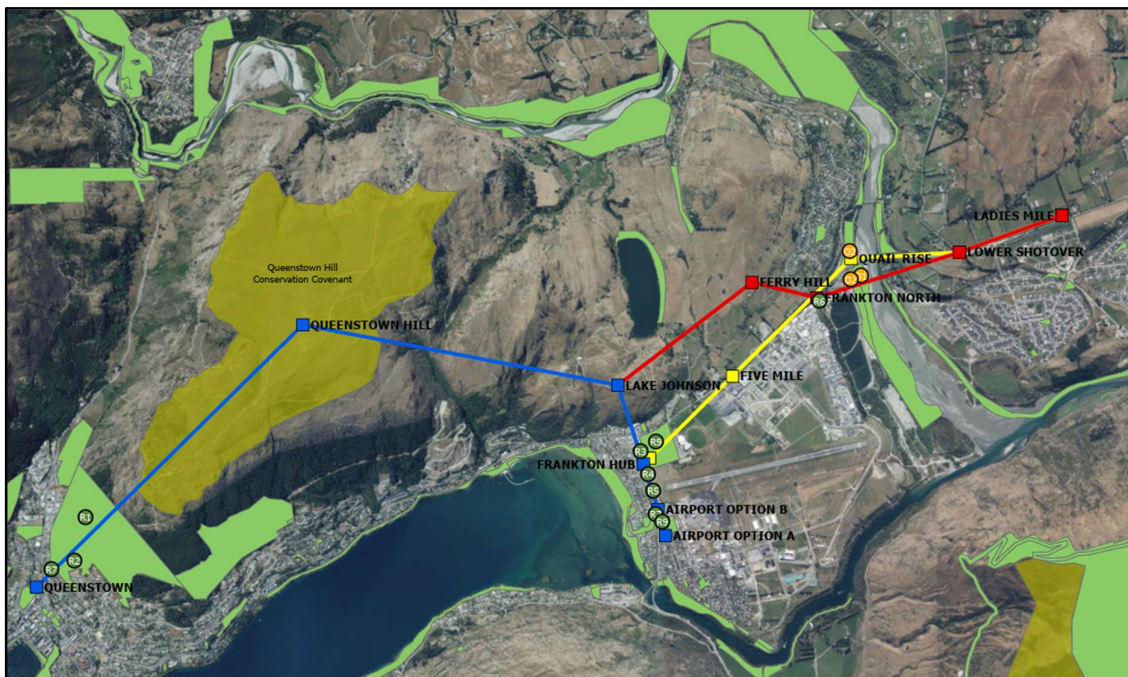


Figure 1: Exert showing the proposed alignment (blue) with two alignment options shown for Ladies Mile (red and yellow).

4. ASSESSMENT

4.1. Context:

- 4.1.1. QLDC administered reserves are shown in green in Figure 1 above. The below is an assessment of the potential effects of the proposal on the QLDC reserve network and the QEC.
- 4.1.2. The proposal includes the use of a range of vested public reserve land which is a combination of recreation and local purpose reserves, and the QEC which is freehold. For the purposes of this memorandum the QEC is referred to as a reserve.
- 4.1.3. Generally speaking, reserves in the Queenstown Lakes District seek to provide the public and local communities with easily accessible spaces to enjoy a variety of sport, recreation and community activities such as but not limited to; organised sport, events, walking, running, cycling, and dog walking. Many reserves also provide access, connection, and interaction to waterways and the lakes and rivers (blue network) and provide for biodiversity and ecological restoration. Due to the topography of the District, high visitor numbers and an active resident population, reserve land is well utilised and faces increasing pressure from competing uses.
- 4.1.4. The QEC is a regionally significant sport and recreation facility that hosts local, national and international sporting and cultural events and provides for many of the community's formal sport and recreation activities. It is a major social infrastructure hub and operates at capacity year-round with sports fields, cricket oval, indoor courts, swimming pool, gym, and the District's only full-size artificial turf. The busy 9-hole Frankton Golf Course is immediately adjacent.
- 4.1.5. Reserve land is highly sought after for use by community groups, clubs and large events, as well as commercial recreation businesses. QLDC receives a high volume of requests to occupy reserve land for a variety of purposes. Due to the topography and the high residential and visitor growth within the Whakatipu, flat usable QLDC administered reserve land is a limited resource. The high cost of undeveloped flat land makes it difficult and often unfeasible for QLDC to acquire additional reserve land, other than small local parks in new subdivisions. As such it is critical that public reserve land is protected for its intended purpose, for existing and future generations.
- 4.1.6. The application proposes a range of infrastructure on a range of reserve types. The applicant has labelled the reserves proposed to be utilised R1, R2, R3 etc. For consistency and clarity this memorandum will use the same naming policy. A table detailing each reserve parcel and the potential impacts arising from the proposal is included as **Attachment 1**. Our response for the referral application focuses on specific large reserves and groups the smaller reserves together as summarised below (and further discussed in section 3.2.6):
 - i. Queenstown Events Centre: QLDC Recreation Reserve and QLDC Freehold – R9
 - ii. Shotover Delta: QLDC Recreation Reserve - O2
 - iii. Queenstown Hill: Recreation Reserve – R1, R2
 - iv. Local purpose or linear recreation reserves adjacent to the road reserve – R3, R4, R5, R6, R7

4.2. **Public Transport vs Private Commercial Use of Reserves:**

- 4.2.1. As covered in other QLDC comments, there is uncertainty still whether this proposal will be a public transport system which delivers public benefits, or whether it is a private commercial operation with limited or no public benefit to the reserve land that it would occupy and the local community.
- 4.2.2. This uncertainty in the proposal is critical to guide any further assessment on the use of reserve land. The limited use of some QLDC administered reserve land may be considered appropriate where the use is for a viable public transport system where it provides a tangible benefit to the community and sufficient mitigation is provided that results in an at least nil (ideally positive) change to the recreation and reserve network.
- 4.2.3. Several reserve parcels would be exclusively occupied and significantly modified by the proposed cable car infrastructure, resulting in a land use change that is contrary to the primary purpose (recreation) of the land parcels. The parcels are vested for beautification, recreation or held for conservation purposes. Occupation with large cable car stations and associated infrastructure will remove these values and potential, irrespective of the commercial or public transport determination of the project.
- 4.2.4. If the project eventuates in being a private commercial operation and not considered to be a viable MRT by ORC, QLDC is being asked to relinquish public reserve land for private benefit, which is contrary to the purpose of the land and may not be politically or publicly acceptable.
- 4.2.5. If the cable car eventuated to be a private commercial operation, the public would also be excluded from using the reserve land unless they paid to use the cable car. As such, it would be much more difficult for Council to justify the use of public reserve land where there is little to no benefit to the local community.
- 4.2.6. In summary, additional analysis and engagement with QLDC is required to investigate alternative alignments and station locations (to what is proposed) that avoids the entire occupation of recreation reserves or detracts from the intended use of the land.

4.3. **Landowner Approval Processes:**

- 4.3.1. The FTAA addresses concessions such as leases, licenses and easements (sections 48, 54 and 61 of the Reserves Act 1977) on reserves.
Due to the proposed alignment and location of certain stations, particularly the entire occupation of O2 and the location on R9, it is considered that the granting of the necessary concessions to give effect to the application would result in the use of the land that conflicts with an existing use of several of the parcels identified, as detailed in **Attachment 1** and summarised in section 4.4 of this memorandum.
- 4.3.2. The FTAA requires the Panel to decline the approval of a concession, if written agreement from the administering body is not obtained. This is qualified, and QLDC cannot unreasonably withhold its agreement and must take into account the purpose of the FTAA and relevant Reserves Act matters. QLDC would consider the compatibility of the proposal with existing uses of the reserves when assessing the suitability of providing written agreement. As the proposal for many of the reserve land parcels is currently contradictory to this, as outlined in the assessment in **Attachment 1** and summarised in paragraphs 4.4.6.1 – 4.4.6.4 of this

memorandum, alternative alignments that sufficiently address the existing land use and purpose need to be considered.

- 4.3.3. For QLDC freehold parcels, the regular process to obtain a lease, license or easement over freehold land would be required. This may require public consultation which would need to occur prior to any written agreement to ensure that the public consultation is meaningful.
- 4.3.4. Based on the above, the process for obtaining landowner approval would require significant consultation with Council (and possibly public consultation) to determine an appropriate alignment to facilitate obtaining Full Council approval. Written agreement, as required under clause 3(1)(m) of Schedule 6 of the FTAA, could not be given for the proposed occupation of any QLDC administered land without Full Council approval.
- 4.3.5. When considering whether to provide written agreement for the use of reserve or recreation land, Council would consider the impacts on the reserve network including:
- i. Displacement of reserve users
 - ii. Fragmentation of reserve network
 - iii. Disrupted access and connection
 - iv. Mitigation/off-setting proposed
 - v. Purpose of occupation (public transport vs. commercial)
 - vi. Future reserve potential and demands from increasing urbanisation and density
 - vii. Capacity of reserve to accommodate proposed infrastructure
 - viii. Classification and intended use of land
 - ix. Designations
 - x. Reserve Management Plan
- 4.3.6. In this instance, the recently adopted (2025) Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (RMP) is of relevance and will also be considered when assessing the suitability of providing any written agreement.
- 4.3.7. Policy 14.3.10 is of most relevance to this proposal but the entirety of the RMP will assist in informing Council. It is included here:
- 14.3.10. New commercial activities within the reserves will generally be limited in scale and location to protect the natural character and recreational values of the reserves. However, proposals that can demonstrate a significant wider public benefit such as improvements to sustainable transport, accessibility, or community connectivity may be considered, subject to robust assessment under the Reserves Act 1977 and appropriate statutory and community consultation.*
- 4.3.8. All of the reserve parcels are also designated in the District Plan mostly for Recreation Purposes, with QEC being designated for a 'Multi-Purpose indoor and outdoor recreation, cultural and conference complex.' Designations provide an important statutory function to ensure activities do not interfere with the purpose of the designation.
- 4.3.9. Section 176(1)(b) of the RMA provides that no person may, without prior written consent [of QLDC as requiring authority], do anything in relation to the land that is subject to the designation that would prevent or hinder a public work or project to which the designation relates. Section 6.6.2 of the application assumes that in most

instances the proposal may not hinder a public work or project. That assumption in the application is not agreed with. The entire occupation of reserve parcels and inefficient alignment dissecting QEC will prevent or hinder the recreation purpose of the designations. As designations are enduring, all potential public works/projects on the designated parcels are not fully realised at this stage and future projects must be considered.

- 4.3.10. Based on the above, approval for works/occupation within a designation from the requiring authority (QLDC) will be required under s176 of the RMA. The FTAA does not address s176 (designations) of the RMA and as such separate approval [from QLDC] under s176(1)(b) of the RMA would be required. The purpose of the relevant designations and s176 of the RMA will assist in informing any consideration for written agreement.
- 4.3.11. In addition to the above approvals, the application may require the reclassification and or revocation of reserve land to reflect the intended use. These are both publicly notified processes not covered by the FTAA. This would need to occur prior to the commencement of any works to ensure meaningful public consultation is achieved as per s24 of the Reserves Act (1977).
- 4.3.12. The above processes are complex with legislated timeframes. Additionally, as some of them may require meaningful public consultation and hearings (if necessary), the outcome cannot be pre-determined if meaningful consultation required by the Reserves Act (1977) and Local Government Act (2002) is undertaken.
- 4.3.13. There are also a number of resource consents and concessions issued to third parties on the reserves, primarily for commercial recreation activities, that need to be considered.
- 4.3.14. In summary, written agreement would be required from QLDC for the use of any land (reserve or freehold). In order to consider any written agreement, significant engagement with Council officers and elected members would be required from the applicant. Parks & Reserves would require the applicant demonstrate that alternative alignments have been considered that adequately mitigate the effects on reserves specifically those outlined in paragraphs 4.4.6.1 – 4.4.6.4 of this memo, and sufficiently considers the assessment matters identified in paragraph 4.3.5 of this memo.

4.4. Impact on Reserve Network:

- 4.4.1. The use of recreation reserves and recreation areas such as QEC for the proposed cable car is of significant concern as it appears little regard has been given to the existing activities and intended purposes of these spaces.
- 4.4.2. The applicant has failed to assess existing recreation use or reserve values that will be affected or displaced by the proposal, or demonstrate how the proposal will not interfere with existing use and/or the purpose and intent of many of the reserve parcels.
- 4.4.3. There has been no consideration of adequate mitigation for the impacts on the community's access to and use of the reserve network, recreation areas resulting from the proposal.
- 4.4.4. The application at s7.2.4 states the proposal will generally result in positive and well-managed effects due to the projects "*contribution to connectivity, public realm*

quality, and sustainable urban growth.” As mentioned in paragraph 4.4.2 the applicant has not assessed specific effects on each of the individual reserves or the QEC and the associated impacts on the community.

4.4.5. The application suggests that the benefit to the public from the implementation of a public transport system will alleviate any remaining adverse effects on the public realm. This ignores effects on existing and future potential uses of the reserve network.

4.4.6. The following provides an assessment of the QLDC administered land that Parks & Recreation consider to be most impacted by the proposal:

4.4.6.1. Queenstown Events Centre & R9:

- The 14.2 hectare community precinct is a highly utilised and important strategic hub. These areas host a multitude of highly valued community and recreation facilities including: the Queenstown Golf Course (the only public golf course in the District); a multi-purpose sports turf used for hockey; eight sports fields used for soccer, cricket, league, rugby, touch, and athletics as well as for large events; six outdoor tennis and netball courts. These facilities are used for training as well as competition.
- QEC is a strategically important and regionally significant facility which includes future Long Term Plan investment to meet future growth. It operates at near capacity year round and needs to accommodate the rapid growth of the District as the only facility of its kind.
- The alignment of the yellow route dissects the QEC site and locates a station on R9. This will undoubtedly diminish the functionality of R9 and QEC and will conflict with the high public use. It will also restrict QLDC's ability to develop the site in the future for as yet unrealised projects to accommodate demands for community facilities.
- Regional facilities such as this, require a large area of land that is extremely difficult to obtain due to the topographical constraints of the District as well as the financial cost of acquiring sufficient land to host such facilities creating a significant burden for Council and the ratepayer.
- The applicant needs to investigate alternative alignments that do not disrupt QEC and relocate the station to avoid disturbing the existing golf activity and preventing future development of community services.

4.4.6.2. Shotover Delta – O2:

- This reserve contains important recreation trails and an associated carpark that connects to the wider trail network. It experiences high usage for recreation as well as active travel/commuting.
- It hosts a large amount of mature vegetation and trees protected under the District Plan as well as providing access to the Shotover River and Historic Bridge, both of which are popular destinations.
- The application proposes to occupy the entirety of the reserve for a station (including a servicing/storage area) and other associated infrastructure.
- The proposal would remove any ability for the land to function for its purpose as a recreation reserve and held for conservation purposes as intended by the notice in the Gazette.
- It is important to also consider the future potential of the reserve as identified in the QLDC Blue Green network for ecological and riparian restoration. The proposal will cause further fragmentation of the reserve network, negatively impacting recreation, biodiversity, and ecological values both current and potential.

- The entire occupation of a recreation reserve will reduce the amount of valuable QLDC reserve land available for public enjoyment and enhancement of the Blue Green Network.

4.4.6.3. **Queenstown Hill – R1 & R2:**

- Queenstown Hill is a large informal reserve that is heavily used for recreation, and it provides one of the backdrops to Queenstown. Any overhead infrastructure will likely require a firebreak, and maintenance access. This has not been assessed.
- The applicant should consider how the proposal can integrate and assist with the Queenstown Hill revegetation plan.
- The proposal does not provide any enhanced access or other benefit to the reserve, or demonstrate how the proposal may integrate with the reserve and trail network. The provision of a cable car will undoubtedly result in increased demand for walking and biking trails.
- Queenstown Hill provides a scenic experience and provides separation from built infrastructure. The proposed infrastructure and any fire break would reduce the amenity and recreation value experienced by reserve users.

4.4.6.4. **Local purpose or linear recreation reserves adjacent to the road reserve – R3, R4, R5, R6, R7**

- These reserves provide a buffer from the road network and include trails/footpaths for pedestrian and cycle access that are frequently used for pedestrian and cycle access.
- These reserves are considered to have greater capacity to accommodate the proposal and are more appropriate for the proposed infrastructure included in the proposal where appropriate mitigation is provided, i.e. retention and enhancement of pedestrian and cycle footpaths/trails and access.

4.4.7. In summary, whilst limited use of reserve land may be considered for some aspects of the application, further analysis and engagement with Council is required by the applicant to investigate alternative alignments that avoid or limit the use of recreation reserve land and existing QEC facilities. This should be achieved by utilising private land to enable the extensive infrastructure proposed within the application.

5. **SUMMARY**

5.1. The QLDC reserve network is heavily relied upon by the applicant to deliver this project. The reliance of the proposal on the reserve network places a burden on public land set aside for sport, recreation, beautification or conservation which so far, the applicant has not sufficiently addressed.

5.2. Further investigation needs to be undertaken by the applicant to refine the proposal and consider alternative alignments that utilise private land for station locations rather than utilising public recreation reserves and reducing the quality and quantity of the open space network. The alignment needs to consider public benefit/access such as connections (existing and future), limiting use of recreation reserve land by avoiding the entire occupation of reserve lots, and avoiding impacting existing and future QEC facilities.

- 5.3. The applicant needs to provide a detailed assessment of public vs private land alternatives. Where public land is the only option, the applicant must provide details of satisfactory mitigation measures to address the removal or reduction in quality, of reserve land.
- 5.4. The use of recreation reserves for a commercial project (ie that does not meet the definition of public transport as guided by ORC as the Public Transport Authority) would be contrary to the intended use and purpose of recreation reserves. The purpose of recreation reserves is to provide public access and enjoyment for recreation and sporting activities and the protection of the natural environment and retention of open space as defined in s17 of the Reserves Act. As a commercial venture, this project would provide little to no benefit to the reserves and would be significantly more difficult to justify the use of reserve land.
- 5.5. The restricted use of some recreation reserve land where it does not interfere with existing uses, and where the adverse effects are able to be appropriately mitigated may be considered for public transport.
- 5.6. The proposal as submitted will result in an increased burden of reserve land, reduced reserve land available for the benefit of the public, increased fragmentation of existing recreation activities and of the blue green network.

6. RECOMMENDATIONS

- 6.1. The applicant needs to consider alternative alignments that avoid the dissection of QEC and the disruption of existing and potential future facilities.
- 6.2. The applicant needs to consider alternative alignments that avoid entire occupation of reserve land and considers existing recreation uses with station and infrastructure location.
- 6.3. Where no alternatives are viable and reserve land is proposed, the applicant needs to provide sufficient mitigation (off setting) that achieves a direct benefit to the reserve and recreation network.