



Order Paper for a meeting

**HEARING OF SUBMISSIONS:**

**Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui  
Queenstown Hill Reserve Management Plan**

to be held on

Tuesday, 5 May 2025

commencing at 10.00am

in the

Council Chambers

10 Gorge Road, Queenstown

### **9.12 Items of business not on the agenda which cannot be delayed | Ngā take kāore i runga i te rārangi take e kore e taea te whakaroa**

*A meeting may deal with an item of business that is not on the agenda where the meeting resolves to deal with the item and the Chairperson provides the following information during the public part of the meeting:*

*(a) the reason the item is not on the agenda; and*

*(b) the reason why the discussion of the item cannot be delayed until a subsequent meeting.*

*s. 46A (7), LGOIMA*

*Items not on the agenda may be brought before the meeting through a report from either the chief executive or the Chairperson.*

*Please note that nothing in this standing order removes the requirement to meet the provisions of Part 6, LGA 2002 with regard to consultation and decision-making.*

### **9.13 Discussion of minor matters not on the agenda | Te kōreorero i ngā take iti kāore i runga i te rārangi take**

*A meeting may discuss an item that is not on the agenda only if it is a minor matter relating to the general business of the meeting and the Chairperson explains at the beginning of the public part of the meeting that the item will be discussed. However, the meeting may not make a resolution, decision or recommendation about the item, except to refer it to a subsequent meeting for further discussion.*

#### **REFERENCE:**

*Queenstown Lakes District Council Standing Orders adopted on 17 November 2022.*

**QUEENSTOWN LAKES DISTRICT COUNCIL**

**HEARING OF SUBMISSIONS ON:**

**TE-TAUMATA-O-HAKITEKURA BEN LOMOND & TE TAPUNUI QUEENSTOWN HILL  
RESERVE MANAGEMENT PLAN**

**PANEL MEMBERS**

**Councillor L. Guy**

**Councillor C. Ferguson**

**Councillor M. Wong**

**Chair of hearing panel to be determined at beginning of hearing.**

**HEARING OF SUBMISSIONS**  
**Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui**  
**Queenstown Hill Reserve Management Plan**



Agenda for a hearing of submissions on the Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui Queenstown Hill Reserve Management Plan to be held in the Council Chambers, 10 Gorge Road, Queenstown on Monday, 5 May 2025 beginning at 10.00am.

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		<b>Apologies</b>
		<b>Declarations of Conflict of Interest</b>
		<b>Confirmation of Agenda</b>
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	11	<b>Attachment A:</b> DRAFT Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan
	45	<b>Attachment B:</b> Full Submissions Pack
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<b>2</b>		<b>Deliberations</b>

## Hearing Panel

5 May 2025

### Report for Agenda Item | Rīpoata moto e Rāraki take [1]

**Department: Community Services**

**Title | Taitara: Hearing report Te Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan**

#### Purpose of the Report | Te Take mō te Pūroko

The purpose of this report is to present the submissions received on the draft Te Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (draft RMP). Council approved the draft RMP (Attachment A) for public consultation at the meeting on 12 December 2024.

This report also provides an analysis of the submissions on the draft RMP. The submission pack (Attachment B) contains all feedback received and officers' comments. This report is intended to support a Hearings Panel (the Panel) of Community & Services Committee members. The hearing provides members of the public who have made a submission the opportunity to speak to their submission.

#### Recommendation | Kā Tūtohuka

That the Hearing Panel:

1. **Note** the contents of this report;
2. **Note** all submissions on the draft RMP and hear any submitters who wish to speak to their submission; and
3. **Recommend** to the Community & Services Committee (following the hearing) a final form of Te Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan with changes as an outcome of the consultation process (final RMP).

**Prepared by:**



**Name:** Sophie Craig  
**Title:** Parks and Reserves Planner  
28 April 2025

**Reviewed and Authorised by:**



**Name:** Dave Winterburn  
**Title:** Acting General Manager – Community Services  
28 April 2025

## Context | Horopaki

1. Te Taumata-o-Hakitekura Ben Lomond Recreation Reserve comprises ten parcels of land totalling 419 hectares. Te Tapunui Queenstown Hill Recreation Reserve comprises four parcels of land totalling 109 hectares. The two reserves adjoin the Queenstown Town Centre, are near one another and have similar characteristics.
2. The existing Resource Management Plan (RMP) addresses both reserves, and it is considered practical to keep both within the same RMP document. The existing version has functioned well since it was adopted as both reserves have similar values, management issues and opportunities and community interests. In addition to this, continuing to keep the reserves within the same RMP document creates efficiencies in terms of staff time and costs associated with preparing the draft RMP.
3. Under Section 41 of the Reserves Act 1977 (the Act) all recreation reserves under Council's administration are required to have reserve management plans, prepared in accordance with the Act.
4. The draft RMP has been in development since August 2021. Progress on the development of the plan was delayed due to reasons outside the RMP process including the COVID Pandemic and staff resourcing. A summary of key milestones achieved to date are summarised in Table 1 below:

**Table 1:** Key milestones to develop the draft RMP

Date	Milestone
19 August 2021	Community & Services Committee approve the intention to notify the preparation of a Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan.
Late 2021 to early 2022	Early engagement with the community and key stakeholders.
October 2021 to January 2022	Let's Talk online campaign to gather community feedback.
12 November 2024	Community & Services Committee recommend to Council to approve the draft RMP to go out for public consultation.
12 December 2024	Council approved the draft RMP to go out for public consultation.
16 December 2024 to 17 March 2025	Formal consultation period.

## Analysis and Advice | Tatāritaka me kā Tohutohu

5. 106 submissions were received on the draft RMP between 16 December 2024 and 17 March 2025 via Queenstown Lakes District Council's (QLDC) online submission portal Let's Talk and by email. One late submission was received on 18 March 2025.

6. 14 submitters indicated they wanted to speak at a public hearing. This has since reduced to the schedule of submitters attached (Attachment C).
7. There are officers' comments responding to each submission (Attachment C) where all submissions are set out in alphabetical order.
8. Of the 106 submissions received:
  - 71 supported
  - 21 neutral
  - 6 opposed
  - 7 provided no indication
9. Key themes that arose through the submissions were:

#### **Community Value of Reserves**

Both reserves are highly valued by the community as informal recreation areas, particularly for their trail networks. There is strong support for enhancing recreation infrastructure within the reserves, including improved wayfinding signage and formalised entrances with parking facilities, toilets, and drinking water fountains.

#### **Biking in Te Taumata-o-Hakitekura Ben Lomond Reserve**

Many submissions supported expanding the mountain biking trail network, with calls for improved signage (wayfinding) and better separation of user groups to enhance safety. However, some opposed further expansion, preferring instead to focus on maintaining and improving the current trail network. This included suggestions for better connectivity between reserve entrances and enhanced trail management and safety.

#### **Biking in Te Tapunui Queenstown Hill Reserve**

There is support for formalising the existing informal network of biking tracks in Te Tapunui Queenstown Hill Reserve. However, concerns were raised regarding the potential impact on walker safety, overall user experience, and impacts on neighbouring property owners. It is noted most of the informal trail network referenced in submissions is located on privately owned land, including Queenstown Hill Station and the Commonage Land (which was owned by QLDC until it was sold in early 2025).

#### **User Conflict**

Concerns were raised about conflicts between bikers and other reserve users. There is support for retaining areas within both reserves as bike-free zones and for improved signage to help manage and guide user activity.

#### **Vegetation Management**

Feedback varied on vegetation management. Some submissions supported the removal of wilding tree species to protect native biodiversity and preserve the landscape values. Others expressed concern that this could reduce the recreational value of the reserves, especially for

year-round biking. There was general support for a phased and carefully planned approach to vegetation removal and replanting.

### **Commercial Activities**

Three submissions strongly advocated for expanding commercial activity within Te Taumata-o-Hakitekura Ben Lomond Reserve. These included proposals for two major developments to allow for the introduction of new large-scale commercial operations. One submission opposed further commercial development of the reserves to preserve the natural backcountry experience of the upper Te Taumata-o-Hakitekura Ben Lomond reserve. Several submissions supported the natural and informal recreation values in the reserves which would likely be compromised by further commercial development.

### **Pest Management**

The submissions generally supported improved pest animal management in the reserves, particularly of goats, to protect biodiversity and preserve the landscape values. Two submissions expressed support for specifically including feral cats as a listed pest species in the RMP.

10. This report recommends that the hearing panel receives the submissions and recommends to the Community & Services Committee the final form of the Reserve Management Plan with changes as an outcome of the consultation process. No options have been considered as this report supports a process set out in the Reserves Act 1977 for consultation on a draft RMP.

## **Consultation Process | Hātepe Matapaki**

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### **Significance and Engagement | Te Whakamahi I kā Whakaaro Hiraka**

11. This matter is of low significance, as determined by reference to the Council's Significance and Engagement Policy 2024. This is because while there is community interest in the development and use of the reserves, the direction of the reserve management plan is generally consistent with existing policy and strategy governing the reserves.
12. The persons who are affected by or interested in this matter are users of the reserve, residents/ratepayers of the Whakatipu Basin community, visitors to Queenstown, immediately adjoining neighbours and local recreation clubs, conservation groups and commercial operators.
13. The Council has undertaken consultation on the draft RMP in line with the requirements of the Reserves Act 1977. The draft RMP was open for public submissions on QLDC's online platform Let's Talk from 16 December 2024 to 17 March 2025. The draft RMP and submission form were publicly notified and advertised through notices in local papers, QLDC's website, social media platforms and radio. Council conducted six drop-in sessions in three locations over two days for people to ask questions. Council also attended a QLDC community event, Summerdaze at Hanley's Farm, with elected members to talk to people about the draft RMP.

### Māori Consultation | Iwi Rūnaka

14. The Council worked with Aukaha and Te Ao Marama to develop the draft RMP.

### Risk and Mitigations | Kā Raru Tūpono me kā Whakamaurutaka

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15. This matter relates to the Community & Wellbeing risk category. It is associated with RISK10005 Ineffective planning for community services or facilities within the QLDC Risk Register. This risk has been assessed as having a high residual risk rating.

16. The approval of the recommended option will allow Council to avoid the risk. This will be achieved by the continued development of the RMP which will be a clear plan for how Council intends to provide for and ensure the use, enjoyment, maintenance, protection and preservation, and enhancement of the reserve.

### Financial Implications | Kā Riteka ā-Pūtea

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17. Preparing and finalising the final RMP is planned for within existing operational budgets.

18. There are no financial implications for recommending the final RMP.

### Council Effects and Views | Kā Whakaaweawe me kā Tirohaka a te Kaunihera

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19. The following Council policies, strategies and bylaws were considered:

- Vision Beyond 2050: Our Vision and Mission - QLDC
- The Reserves Act 1977
- Local Government Act 2002
- Parks and Open Spaces Strategy 2021
- Significance and Engagement Policy 2024
- The QLDC Disability Policy 2018
- Proposed and Operative District Plan
- QLDC Climate and Biodiversity Plan 2022

20. The recommended option is consistent with the principles set out in the named policies.

21. This matter is not included in the Long Term Plan/Annual Plan. However, funding to support some action enabled and directed by the final RMP may be funded from existing Long Term Plan budgets.

### Legal Considerations and Statutory Responsibilities | Ka Ture Whaiwhakaaro me kā Takohaka Waeture

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22. Section 41 of the Reserves Act 1977 states all recreation reserves under Council's administration are required to have reserve management plans, prepared in accordance with the Act.

Local Government Act 2002 Purpose Provisions | Te Whakatureture 2002 o te Kāwanataka ā-Kiaka

23. Section 10 of the Local Government Act 2002 states the purpose of local government is (a) to enable democratic local decision-making and action by, and on behalf of, communities; and (b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. The development of the RMP ensures there is a plan in place to guide management of the reserve to achieve community outcomes. As such, the recommendation in this report is appropriate and within the ambit of Section 10 of the Act.

24. The recommended option:

- Can be implemented through current funding under the Long Term Plan and Annual Plan;
- Is consistent with the Council's plans and policies; and
- Would not significantly alter the intended level of service provision for any significant activity undertaken by or on behalf of the Council or transfer the ownership or control of a strategic asset to or from the Council.

Attachments | Kā Tāpirihaka

A	Draft Te Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan
B	Full submissions pack
C	Schedule of submitters

RESERVE MANAGEMENT PLAN DRAFT 2024

# DRAFT Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves QLDC

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This Plan replaces the Ben Lomond and Queenstown Hill Reserve Management Plan dated 3 August 2005.

**Other related documents:**

Te Tiriti o Waitangi  
Reserves Act 1977  
Resource Management Act 1991  
Conservation Act 1987  
Health and Safety Act 2015  
Te Runanga o Ngai Tahu Act 1996  
Ngai Tahu Claims Settlement Act 1998  
Wildlife Act 1953  
Wild Animal Control Act 1977  
Fire and Emergency New Zealand Act 2017

Otago Regional Pest Management Plan  
National Wilding Confer Strategy  
ICOMOS New Zealand Charter for the Conservation of Places of Heritage Value

FENZ 'Flammability of indigenous plant species' guide

Te Tangi a Taurira – The Cry of the People  
The Kāi Tahu ki Otago Natural Resource Management Plan 2005  
A Kāi Tahu Blue Green Network Ki Uta Ki Tai

QLDC Activity Controls to Manage Wildfire Risk within Reserves  
QLDC Alcohol Bylaw  
QLDC Art in Public Places Policy  
QLDC Creativity, Culture and Heritage Strategy  
QLDC Disability Policy  
QLDC District Plan  
QLDC Dog Bylaw  
QLDC Events Strategy  
QLDC Film Permit - for drone use  
QLDC Open Spaces Strategy  
QLDC Plaques, Memorials & Monuments Policy  
QLDC Smoking Policy  
QLDC Traffic and Parking Bylaw  
QLDC Tree Policy

QLDC Wildfire Reserve Closure Plan  
QLDC-NZTA Active Travel Strategy

Note that this is not an exhaustive list – additional policies may be relevant and any future variations of the polices listed.

**Other relevant parameters for management and decision making:**

QLDC Delegations Register:  
- Community & Services Committee  
- QLDC Full Council

**Process for preparing a reserve management plan in accordance with the Reserves Act 1977:**

16 September 2021 Committee approved creating plan  
xx xxxx 2024 Notice invited submissions on the draft plan  
xx xxxx 2024 Submissions close  
2025 Hearing held (*if required*)  
2025 Committee recommends adopting plan  
2025 Full Council adopts plan

**Review:**

Generally, reserve management plans should be reviewed at a minimum of 10-year intervals by Parks Officers. This does not necessarily require a rewrite.

## 1. INTRODUCTION

This Reserve Management Plan (Plan) provides the vision for how Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves are experienced and valued, now and into the future.

This Plan's objectives and policies define common management and development intentions and aspirations across both reserves. The Plan also includes targeted objectives and policies for specific areas within each reserve. These will guide QLDC decision making or activities on the reserves, while achieving the community's vision for the reserves.

The reserves are located on Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill. The mountainous topography sits behind the urban centre creating a spectacular alpine backdrop that is unique to Tāhuna Queenstown. The dramatic scale of the landscapes provides world class views that evolve throughout the changing seasons.

The reserves provide a range of opportunities for recreation experiences that are readily accessible and within large-scale backcountry landscapes for locals and visitors to Tāhuna Queenstown. Both reserves have been identified as wāhi tūpuna; places of ancestral significance and they remain of great importance to mana whenua today.

The emphasis of this Plan is on providing reserves that protect the natural and cultural values, enable community connection and facilitate access to the natural environment and provide a range of recreation and open space experiences.

This Plan is prepared in accordance with the Reserves Act 1977 which requires QLDC to prepare reserve management plans for all land classified as Recreation Reserve under council management or control.

## 2. VISION

The vision for the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill reserves is:

*Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves are highly valued, biodiverse landscapes providing a backdrop to Tāhuna Queenstown and access to the backcountry alpine environment. They provide a broad range of sustainable recreation activities, in balance with social, environmental, cultural and economic well-being.*

## 3. MANA WHENUA

The rakatirataka of Kāi Tahu in Tāhuna Queenstown rests in the seven papatipu rūnaka who are recognised as mana whenua:

- Te Rūnaka o Moeraki
- Kāti Huirapa Rūnaka ki Puketeraki
- Te Rūnanga o Ōtākou
- Hokonui Rūnanga
- Te Rūnanga o Ōraka Aparima
- Awarua Rūnanga
- Waihōpai Rūnaka

This shared authority status indicates the significance of the area for Kāi Tahu, as a vital component of economic activity in southern Te Waipounamu. Regularly moving inland from the coast gave rūnaka and whānau opportunities to access and practice mahika kai, transmit and enhance mātauraka, and maintain economic, cultural, social, and political connections. Reflecting the importance of the area, both reserves are recognised as wāhi tūpuna. Beyond the reserves, ancestral connections are recognised the landscapes and waterways through policy and legislation. These landscapes continue to express the identity of Kāi Tahu as mana whenua, past, present, and future.

Kāi Tahu hold an enduring relationship with Te Taumata-o-Hakitekura and Te Tapunui, which encompasses land and water, names and stories, mātauraka and tikaka, and the associated taoka and mahika kai of these places. Ara tawhito (traditional travel routes) provided mana whenua safe access

inland to undertake these vital economic activities, forming the basis of the shared mana status of the area. Significantly, these activities included access to the pounamu trade as source material for manufacturing of stone tools.

The following Kāi Tahu values are relevant to the reserves:

**Mauri** means life force or principle that exists in all things. In the context of the reserves this relates to the preservation and enhancement of mauri to ensure that the life force is in balance, and that the taiao (environment) including whenua and wai, flora and fauna, and people, are healthy and thriving. This can be achieved through balancing the social, environmental, cultural and economic well-being of community's use of the reserves.

**Manaakitaka** refers to the action of expressing mana through hospitality. For Kāi Tahu, being mana whenua includes the duty to offer manaaki to manuhiri (visitors). Welcoming visitors into the reserves may take different forms, including expressing the manaakitaka of mana whenua through visual and/or written interpretation. Manaakitaka will be further expressed by providing safe, accessible routes and facilities, and by promoting ecological regeneration of indigenous plants and animals to manaaki native biodiversity in this space. In turn the natural environment can manaaki us, through the provision of ecological services that support our wellbeing.

The value of **whanaukataka** is linked to relationships and social connections. In this context, the reserves provide opportunities for whānau and community links to be celebrated and enhanced, as a place for people to come together for fun and relaxation. The reserves also create new opportunities to connect with te taiao (the natural world), with mana whenua stories, and with each other, promoting social connection and enhancing wellbeing.

**Haere whakamua** relates to being future focused, but with our eyes firmly on the knowledge, learning and practices of the past. By enhancing and restoring the indigenous flora and fauna of the reserves, we can create spaces that will support the community and our environment into the future.

#### 4. MANA WHENUA HISTORY

The reo Māori name of Ben Lomond, Te-Taumata-o-Hakitekura, translates "*to the seat of Hakitekura*". Hakitekura was the daughter of renowned rakatira Tuwiroa. She was also an inspirational wāhine toa (female leader) and tupuna (ancestor) of Kāi Tahu Whānui and many landmarks in the area are named after her.

The name Te-Taumata-o-Hakitekura comes from the story of Hakitekura being the first person to swim the 3-kilometre distance across Whakatipu-waimāori (Lake Whakatipu).

Hakitekura sat on the mountain and watched other young women have swimming competitions in the

lake. She observed from her position for many days and became determined that she could do better.

Early one morning she began to swim from Tāhuna (Queenstown) and steered in the darkness using the rising sunlight reflecting off the peaks across the lake as a guide. These two mountains now known as Walter Peak and Cecil Peak were named Kā Kamu-a-Hakitekura, meaning "*the twinkling seen by Hakitekura*."

She landed at Te Ahi-o-Hakitekura (Refuge Point) and lit a fire using raupō (bullrush fibres) and a kauati (fire stick). The rocks there still bear the blackness from the soot of the fire hence the name, which means "*the fire of Hakitekura*."

When the flickering light of Hakitekura's fire was seen across the water, her father Tuwiroa, a revered Kāti Māmoe chief, remembered his daughter's earlier request for a kauati, and sent a waka across the lake to bring her back.

The reo Māori name of Queenstown Hill, Te Tapunui translates to "*mountain of intense sacredness*", reflecting the importance of the area as the ultimate source of freshwater in the south of Te Waipounamu, from the mountains to the sea.

#### 5. RESERVE DESCRIPTIONS

This Plan covers two main areas of reserve land. These are:

## 5.1 Te-Taumata-o-Hakitekura Ben Lomond Reserve

Te-Taumata-o-Hakitekura Ben Lomond Reserve is 388 hectares. This reserve contains several parcels of reserve land classified as scenic, recreation, local purpose (water supply) and commonage reserve. Refer to Appendix 2 for legal descriptions.

Extensive areas of Scenic reserve land administered by The Department of Conservation (DOC) and LINZ Pastoral Lease (Ben Lomond Station) adjoin much of the council reserve land. Refer to the map in Appendix 1.

The summit of Te-Taumata-o-Hakitekura Ben Lomond sits at 1,748m, is on pastoral lease land and can be seen from the town centre and across the Whakatipu Basin.

Bob's Peak on the southern side of the reserve is highly visible from the town centre at 812m. Bob's Peak is a spur on the ridgeline that leads up to the Te-Taumata-o-Hakitekura Ben Lomond summit. This area supports most of the commercial recreational activity that occurs in the reserve, including the Skyline Gondola.

### Water Catchment

The reserve is a steep sided glacial mountain with a southeasterly aspect, and comprises of Reavers, Brewery and Horne (Bush) creek catchments. The catchments include the following headwater creeks:

- One Mile

- Two Mile
- Reavers
- Brewery

The creeks and a large area of the reserve discharge directly into Lake Whakatipu or from the western side of the Horne Creek catchment area.

### Vegetation

Douglas fir, an aggressive wilding conifer species is the predominant vegetation on the lower slopes of the reserve. Above this, tussock grassland dominates with a narrow band of sub-alpine shrubland in places.

Remnant mountain beech forest occupies some of the upper slopes and the sides of One Mile, Two Mile and Horne Creek. In the damp gullies and nearer the streambeds, the forest is more diverse with several native species present. The Tiki Trail weaves through patches of beech forest halfway up 'Bob's Peak'.

The damp gullies also contain patches of sycamore. There are small areas of larch present on the western faces, prominent during autumn. Redwood species have been planted on the lower slopes where logging has occurred and many other exotic and weed species are common across the reserve.

### Access

The primary access to the reserve is from Brecon Street. Other access points include Lomond Crescent, One Mile and Wynyard Crescent. The

secondary access points are becoming increasingly popular due to the development of new mountain biking trails and features.

### Recreation

Te-Taumata-o-Hakitekura Ben Lomond Reserve supports the following recreational and commercial activities:

- Walking
- Trail running
- Ben Lomond Mountain Bike Trails
- Wynyard Jump Park
- Skyline Gondola and Luge
- Ziptrek Ziplining
- G-Force Paragliding
- The Ledge Bungy and Swing
- Guided walking
- Mountain biking guiding/coaching
- Hang gliding/Paragliding

### Infrastructure

The reserve contains the following public utility infrastructure:

- Fernhill water reservoir
- Water tanks
- Skyline power lines
- Aurora power lines and buildings
- One-mile historic power station (historic utility service infrastructure)
- Rockfall fences

## 5.2 Te Tapunui Queenstown Hill Reserve

The reserve is 109 hectares located on the southeast and southwest side of Te Tapunui Queenstown Hill. The summit is at 907m and is on privately owned land, situated outside of the reserve boundaries on Queenstown Hill Station. The reserve offers views of the Remarkables, Queenstown Bay, Coronet Peak, Te-Taumata-o-Hakitekura Ben Lomond and Ferry Hill.

The reserve area lies to the northeast of the town centre and comprises of four parcels of land held as recreation and local purpose reserves. Refer to Appendix 2 for legal descriptions.

### Water catchment

The reserve does not contain any named waterways, but the land area forms part of the eastern side of the Horne Creek catchment which flows into Matakauri Wetland entering Lake Whakatipu at Te Karere Queenstown Gardens. The catchment on the southern side of the reserve discharges into smaller waterways that flow towards and under Frankton Road into Lake Whakatipu.

### Vegetation

Te Tapunui Queenstown Hill reserve is largely covered with wilding conifer tree species. It is predominantly forested with Douglas fir but includes other exotic species such as Pinus radiata, larch,

cypress, silver birch, rowan, hawthorn and sycamore.

The reserve supports very small areas of remnant beech forest, but most native species have been suppressed and outcompeted by Douglas fir.

### Access

Primary access to the reserve is off Belfast Terrace and Kerry Drive, with secondary accessways off Vancouver Drive and Highview Terrace. Much of the reserve's lower boundary is inaccessible due to landlocking as a result of urban development and an absence of formed public entrances.

### Recreation

Te Tapunui Queenstown Hill Reserve supports the following recreational and commercial activities:

- Walking
- Trail running
- Mountain biking (Kerry Drive Jump Park)
- Guided walking
- Rock climbing

### Infrastructure

The reserve contains the following public utility infrastructure:

- Aurora power lines and buildings.

## 6. LANDSCAPE VALUES

The reserves are tangible evidence of the glacial processes that formed the Whakatipu Basin. They are geologically and topographically dynamic components of the landscape and their significance is enhanced by their proximity to the urban environment.

## 7. ECOLOGICAL HISTORY AND MANAGEMENT

### 7.1 Ecological Context

The postglacial vegetation would have comprised of beech forest with broad-leaved species in the damper gullies and along the lake edge. A few podocarps such as Matai, Hall's Totara and Mountain Toatoa may have also been present.

Large areas of the forest canopy were burnt by fires started naturally and by humans to clear the land for agriculture. Small remnants of the original postglacial vegetation remain today.

During the 1940's and 50's as part of Arbour Day activities, local school children planted exotic trees along the foot of Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill. An aerial drop of seed in 1964 assisted the spread of Douglas Fir. At this time exotic trees only sparsely covered the reserves with grasses dominating. The present mix of large exotic trees in both reserves is the result of these plantings and of the subsequent natural spread from seedlings.

The ecological significance and future potential restoration lie in the preservation, enhancement and maintenance of the existing natural values, particularly the areas of remnant native forest.

Restoration of wāhi tupuna native ecology can be achieved through reforestation of low flammability native species. It is intended that revegetation programmes for both reserves include a mix of native and non-invasive exotic species. It is recognised that some exotic, non-wilding species such as Redwoods, Leylan cypresses, cedars and spruces have attributes that contribute to recreational values, such as being fast-growing and providing for dry, all-weather tracks, while competing with noxious weed species.

### **7.3 Te Mana o te Wai Water Management**

Te Mana o te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community to protect the mauri (life force) of the water.

Consistent with the guiding principle of Te Mana o te Wai, activities within the reserves, particularly vegetation management should not be considered in isolation from the health of these catchments and the downstream environment including Lake Whakatipu.

### **7.4 Wilding Conifers**

Douglas fir is a wilding conifer which has gradually infested both reserves at the expense of native species and is now the predominant vegetation cover.

Douglas fir seedlings grow in lower light conditions than beech and can infiltrate mature beech forest so they not only prevent natural beech regeneration around the forest edges, but also will out compete mature beech trees and reduce their vigour and longevity.

Douglas fir have the potential to grow at much higher altitudes than mountain beech, and significantly higher than the peak of Te-Taumata-o-Hakitekura Ben Lomond.

The Otago Regional, Pest Management Plan (ORPMP) and National Wilding Confer Strategy note the indigenous ecosystems at particular risk from wilding conifer invasions include tussock grasslands and sub-alpine shrublands and that Douglas fir in particular pose a significant threat to established native forests. The ORPMP seeks to progressively contain and reduce the geographic extent of wilding conifers within the Otago Region.

A National Wilding Conifer Control Programme has been developed and provides a collaborative funding model for addressing infestations. The Douglas fir on the reserves provide a significant seed source for the wider Whakatipu Basin. The

Whakatipu Wilding Conifer Control Group (WCG) was established solely to fight wilding conifers in the area.

The removal of the established Douglas fir forest will impact some of the recreational and commercial activities within the reserves. For example, exotic conifer forests transpire more water than native bush and provide dry, all-weather mountain biking tracks. Another example is Ziptrek Ecotours, which has established ziplines high in the canopy of large Douglas fir trees. The development of a revegetation strategy for the replacement tree canopy in the areas supporting these activities is essential.

Without active management and intervention Douglas fir will continue to threaten landscape, ecological and cultural values and the remaining biodiversity within and adjacent to the reserves will be lost.

The steepness of the reserves, particularly Te-Taumata-o-Hakitekura Ben Lomond, creates access issues for wilding conifer control and native restoration planting. In addition, the presence and number of people and commercial operations in the reserves impacts the ability to deliver pest and plant control programmes from an operational and safety perspective.

Implementing revegetation strategies will be a key factor in preserving the highly valued landscape character of the reserves. To preserve the interests of all affected stakeholder groups and to effect long

term biodiversity improvements, considered and measured change will be required.

### **7.5 Other Pest Animal and Plant Management**

Detrimental pest animal species present in the reserves include possum, mustelids, mice, rats, hares, deer and goats. These pests have a significant impact on the indigenous ecosystems, preventing the regeneration of native seedlings and saplings and damaging predation on native birds and insects.

Feral goats are a particular issue on these reserves and on adjoining DOC and private land.

Feral goat numbers are steadily increasing in the reserves and their presence has a significant negative impact on native biodiversity. The goats browse on native vegetation as a food source and trample it as they feed. Goat control will play an important part in the success of any revegetation programme, including any landscaping of the reserves. A coordinated approach to control across boundaries and agencies is required to achieve an effective response within the area where feral goats can roam.

Other invasive pest animal species threatening the reserves' ecology include deer, possum and hare.

Pest plants of particular concern that are common in the reserve are Buddleia, Old Man's Beard, Sycamore, and Spanish Heath (in addition to wilding conifers).

### **7.6 Co-ordinated Management**

The reserves contained in this Plan adjoin many diverse land parcels and there is no distinction between the boundaries of these areas on the ground. It is important to ensure coordination between QLDC and DOC, as well as key stakeholder groups such as the WCG, the Queenstown Mountain Bike Club, commercial lessees, and adjoining landowners.

## **8. DESCRIPTION OF PRIMARY USERS AND ACTIVITIES**

The reserves are a significant recreation resource in terms of their land area, terrain, topography, views, proximity to Tāhuna Queenstown and sense of place. They are both heavily used for a variety of recreational activities by both residents and visitors.

Both reserves have a large network of trails used by walkers and trail runners. Te-Taumata-o-Hakitekura Ben Lomond also has a very popular mountain bike trail network that provides for intermediate to expert riders. The number of trails has multiplied rapidly over time, fuelled by the increased popularity of mountain biking, the introduction of E-bikes and as the reputation of Tāhuna Queenstown as a world class mountain biking destination has grown. Large national and international mountain biking events are held each year. There are a range of commercial recreational and tourism focused activities,

predominantly on Te-Taumata-o-Hakitekura Ben Lomond Reserve, that, along with the mountain biking activity, bring significant economic benefit to Tāhuna Queenstown.

### **8.1 Te-Taumata-o-Hakitekura Ben Lomond Reserve**

The extensive trail network on Te-Taumata-o-Hakitekura Ben Lomond is very well utilised by trail walkers and runners year-round. The trail that continues to the summit is also very popular and forms an important part of the history of the Tāhuna Queenstown. Hakitekura watched over the lake from this location before starting her now renowned swim across to Refugee Point. When European tourism to the area started to become popular, climbing 'Ben' was a target for adventurous visitors. Today the walk remains a ritual for many. There are many popular walking and biking trails that start from various entrance points to the reserve, for example, the Tiki Trail is a steep and winding track that starts in the Queenstown Cemetery and finishes at a lookout at the top of Bob's Peak, providing many walkers an alternative access to the Skyline Gondola complex.

Various commercial recreation facilities have been developed on Bob's Peak to support a range of tourist and recreational activities. The Skyline Gondola is a significant part of the tourism infrastructure in Queenstown. It first operated in 1967 and travels 450 m to the top of Bob's Peak. It is a steep cable car which is only possible due to the topography of the reserve.

The Skyline Gondola complex, including the upper and lower terminal, supports several ancillary commercial activities, including dining and luge carting. Riding the gondola also provides access to the Ben Lomond Mountain Bike trails, G-Force Paragliding and the Ledge Bungy and Swing.

Ziptrek Ecotours operates ziplining tours from Bob's Peak that includes six ziplines and twelve treehouses. This can be accessed by riding the Gondola or via the Tiki Trail walking track.

These commercial operations are managed by way of lease and licensing arrangements, refer to Appendix 3 for a table showing these.

There is currently one guided walking permit and two guided mountain biking permits for Te-Taumata-o-Hakitekura Ben Lomond Reserve.

Recreational hang gliding and paragliding occurs above the recreational reserve land on DOC administered scenic reserve from a designated take off point under the Civil Aviation Act to the northwest of the Gondola. This is a 10-minute walk from the commercial tandem launch site operated by G-Force (refer above).

## **8.2 Te Tapunui Queenstown Hill Reserve**

Te Tapunui Queenstown Hill Reserve has an established popular walkway known as the 'Queenstown Hill Time Walk' which leads up to the 'Basket of Dreams' sculpture and a lookout spot

which sits just outside the reserve boundary on Queenstown Hill Station. Public access over the parts of the trail within private land is protected by a covenant. The trail includes interpretive panels providing information about different periods in Queenstown's history.

The QMTBC has a licence over an area at the end of Kerry Drive on Te Tapunui Queenstown Hill Reserve where they have developed a dual pump track. Unauthorised mountain biking tracks have also been developed within Te Tapunui Queenstown Hill Reserve.

There is currently one guided walking permit for Te Tapunui Queenstown Hill Reserve, refer to Appendix 3.

Rock climbing is undertaken on the northwestern side of Te Tapunui Queenstown Hill Reserve accessed from Gorge Road. A commercial recreation climbing activity 'Via Ferrata' using fixed metal handles is accessed via an easement over the reserve.

## **9. NATURAL HAZARDS**

Tāhuna Queenstown is positioned near the alpine fault of the Pacific and the Australian plates. It is the forces of these plates which have created our dramatic alpine environment and beautiful landscapes and provided unique recreational opportunities,

But the landscapes can be highly dynamic and changeable and make Tāhuna Queenstown prone

to natural hazards, such as earthquakes, debris flows and rockfall.

### **9.1 Land instability**

Rockfall and debris flow present a risk to life and property in the area below Te-Taumata-o-Hakitekura Ben Lomond Reserve. Specifically, the upper part of the reserve and surrounding land is a source of material for rockfall and debris flow events. Mature trees and vegetation in the catchment may also contribute to debris flow material if dislodged. Rockfall and debris flow hazards can have significant consequences due to their power and unpredictability.

Areas at the base of Te-Taumata-o-Hakitekura Ben Lomond Reserve, including the Brewery Creek and Reavers Lane alluvial fan surfaces located off Gorge Road, are subject to different levels of risk from rockfall and debris flow hazards.

Vegetation cover within the Te-Taumata-o-Hakitekura Ben Lomond Reserve plays a role in determining the scale and extent of natural hazard risk in the areas on the valley floor, in particular, the harvesting or removal of mature exotic trees from the reserves and surrounding land. As such, vegetation management within the reserve needs to reflect this.

### **9.2 Climate Change**

The risk from natural hazards is expected to increase with the impact of climate change. An

example in the Te-Taumata-o-Hakitekura Ben Lomond Reserve was seen during September 2023, when a 25 year-high rainfall event contributed to the debris flows into Brecon Street and Reavers Lane.

### **9.3 Wildfire Risk**

Wildfire presents a significant risk to both reserves, particularly with climate change contributing to higher temperatures and more regular droughts. The flammable nature of the Douglas fir and other non-native invasive species found within the reserves also heightens the wildfire risk.

Fire and Emergency New Zealand (FENZ) have identified these reserves as high risk wildfire zones which are subject to a total fire ban all year round. Open fires or fireworks are prohibited in the reserves at all times.

An Environmental Monitoring System which provides live micro-climate weather updates, air quality, and visual and thermal imaging, enabling early fire detection has been installed around the base of Te-Taumata-o-Hakitekura Ben Lomond Recreation Reserve.

## **10. COMPETING RECREATIONAL DEMANDS**

The increase in the popularity of mountain biking, the introduction of e-bikes and the increase in the visitor and resident population has seen significant growth in the use of mountain bikes within the reserves. Trails that were previously exclusively used by walkers and runners are now dual use for mountain biking, which can create some user conflict.

Many unauthorised mountain biking tracks have been developed outside the planned trail network within the reserves. These reduce the quality of the recreation experience and can adversely impact ecological values.

## **11. PLANNED COMMERCIAL RECREATION DEVELOPMENTS**

### **11.1 Skyline**

As part of a significant programme of upgrades, Skyline replaced its existing 4 seat gondola with a 10-seat gondola in 2023. As part of this work the upper and lower terminal buildings were upgraded to accommodate the larger gondola and to increase visitor capacity and a multi-storey car park building for reserve users was constructed.

### **11.2 AJ Hackett Bungy**

AJ Hackett Bungy have advised they intend to renew their current platform structure in the future. As part of their resource consent, they are required to screen their activity from the Queenstown Town centre. This is currently achieved with a stand of wilding conifers.

### **11.3 Helicopters**

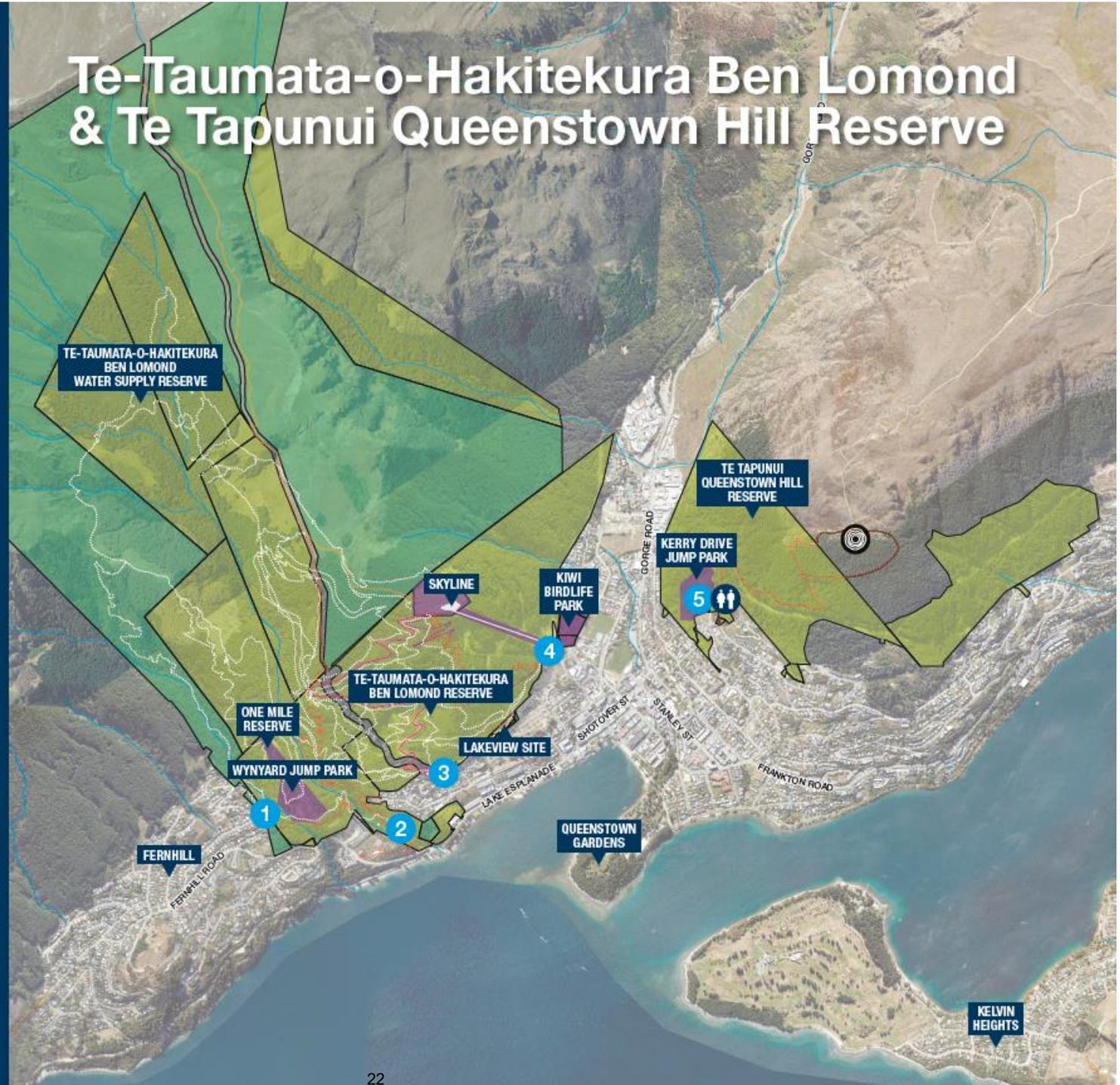
Currently authorised helicopter movements within the reserves are limited to operational purposes such as search and rescue, commercial site management, harvesting, wilding conifer and pest control. Helicopter landings for commercial tourism purposes have been limited in the past as these movements were deemed incompatible with the quiet natural values and character of the surrounding area due to their effect on the recreational users experience and enjoyment of the of the reserve.

# Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui Queenstown Hill Reserve

- QLDC Reserves
- DOC Public Conservation Land
- Lease Area
- Land parcels
- Waterways

- 1 Wynyard Crescent Entrance
- 2 One Mile Entrance  
Car park
- 3 Lomond Crescent Entrance
- 4 Tiki Trail Entrance
- 5 Kerry Drive Entrance  
Car park, toilets

- Access Road
- Track / Path
- MTB
- Ziptrek Ecotours
- DOC Track
- Basket of Dreams



## 12. OBJECTIVES

The following objectives are provided to manage the Reserve and support the vision. They are overarching goals; succinct statements on the principal aims of this RMP.

- 12.1 To continue to partner with Kāi Tahu to manage the reserves, providing recognition of ancestral connections and associations with the whenua, and facilitating their role as kiatiaki.
- 12.2 To manage the reserves in a way, that responds and adapts to the impacts of climate change and natural hazards.
- 12.3 To protect and enhance the water quality in all water catchments within the reserves.
- 12.4 To protect, restore and enhance existing biodiversity values by actively managing invasive species.
- 12.5 To allow the planting of non-invasive exotics species that assist native regeneration and support sustainable recreation opportunities.
- 12.6 To enable new recreation opportunities that are sustainable and low impact on the environment.
- 12.7 To enhance low impact recreation access to backcountry alpine terrain.
- 12.8 To support community volunteers to undertake ecological and recreation programs within the reserves.
- 12.9 To work with other agencies, such as Department of Conservation, FENZ, and private landowners and stakeholders to deliver effective management outcomes on the reserves.
- 12.10 To protect landscape and ecological values by implementing staged considered approaches to wilding conifer and noxious vegetation removal.
- 12.11 To acknowledge and conserve heritage values associated with the reserves.
- 12.12 To provide for people of all abilities opportunities to be active, recreate, come together, connect with nature and find respite.
- 12.13 To provide for a variety of appropriate commercial recreation and informal recreation opportunities that support Queenstown's tourism industry as well as the local community's enjoyment of the reserves.
- 12.14 To provide for accessible connections into the reserves.
- 12.15 To promote built structures that support the recreation uses of the reserves and that positively contribute to the reserve amenity and provide public benefit.
- 12.16 To formalise a sustainable and well managed trail network within the reserves that meets the needs of a range of trail users, provides a cohesive track network, and considers ongoing safety requirements.
- 12.17 Enable recreational use and enjoyment of the reserves by responding to shifts and changes in demand for recreational activities.

## 13. RESERVE AREAS

### 13.1 Te-Taumata-o-Hakitekura Ben Lomond

Key recreation areas which have specific objectives and policies have been identified below. Some are formally developed, others have gradually evolved over time with increasing demand.

#### 13.1.1 Wynyard Crescent Entrance

**Description:** This area is one of the primary entry points to various biking and walking trails, Fernhill Loop, Wynyard Jump Park, McNearly Gnarly, and the wider Te-Taumata-o-Hakitekura Ben Lomond Reserve.

This entrance has a small existing gravel hardstand area that was likely developed to provide access to the nearby water treatment plant. No formalization of the access area has been undertaken by Council

The only provision for parking is a steep informal area created by reserve users. This has provided an additional parking area since the development of the McNearly Gnarly trail and the redevelopment of the Wynyard Jump Park.

There is high demand due to the popularity of new trails and reduced carparking at Brecon Street. Cars

often park over the emergency access area. Part of this area is owned and managed by DOC,

**Facilities:**

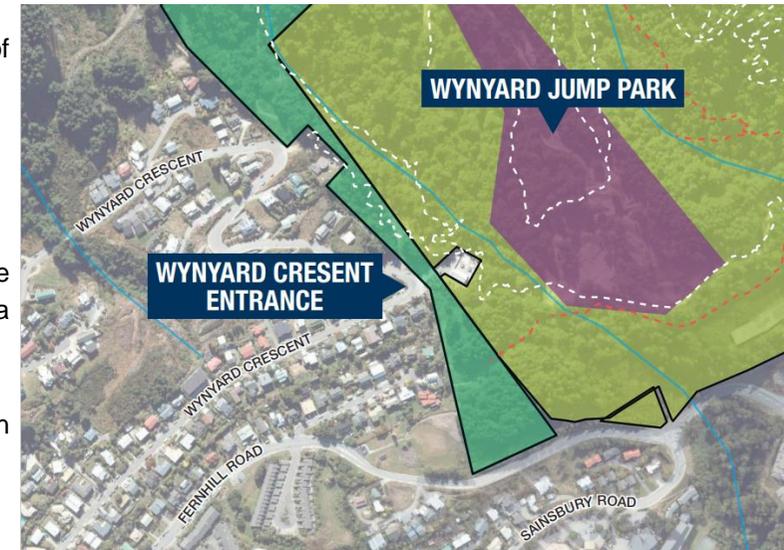
- Limited on-street parking available
- Insufficient signage
- An emergency services entrance to the western end of Te-Taumata-o-Hakitekura Ben Lomond Reserve
- Access to 4WD maintenance tracks
- Fernhill reservoir which provides town supply water

**Objective:**

**13.1.1.1** To acknowledge the Wynyard Crescent entrance as a formal recreation arrival area.

**Policy:**

**13.1.1.2** Enable the development of the reserve area off Wynyard Crescent to improve access to the Wynyard Bike Park and trail network.



Map showing location of Wynyard Crescent Entrance



Photo of Wynyard Crescent Entrance

### 13.1.2 Wynyard Jump Park

**Description:** Queenstown Mountain Bike Club (QMTBC) licenced area for a purpose-built bike jump park. Dirt jumps, the Dream Tracks (Big Dream and Mini Dream), comprehensive trails and wooden structures have been established, providing for a range of abilities and hosting events.

The jump park is connected into the wider trail network, with trails leading into and out of the licenced area. Signage and wayfinding needs to be improved within the park.

#### Facilities:

- Bike jump park with dirt jumps and wooden structures,
- Picnic tables
- Limited signage

**Total area:** 5.0 hectares

#### Objective:

**13.1.2.1** To recognise and manage the licence area as a technical, specifically constructed, mountain bike jump park.

#### Policies:

**13.1.2.2** Ensure the Wynyard jump park does not extend beyond the physical boundaries of approved licenced area.

**13.1.2.3** Consider providing recreation facilities that include water fountains, toilets, bike washdown area and additional wayfinding signage.

**13.1.2.4** Remove old and unused signage and structures.

**13.1.2.5** Consider upgrading the existing access road (over Two Mile Creek), to provide for emergency access – this may require a culvert or bridge.

**13.1.2.6** Map and document the location of underground infrastructure, to ensure that any new or existing trails do not impact future maintenance or management of the infrastructure.



Map showing location of Wynyard Jump Park



Photo of Wynyard Jump Park

### 13.1.3 Fernhill Loop Trail

**Description:** The Fernhill Loop Trail is a very popular walking, biking and running trail located within Te-Taumata-o-Hakitekura Ben Lomond reserve. The trail is approximately 6.8 kilometres long and traverses 509 metres of elevation and 498 metres of descent. It is a single trail through beech and conifer forest, crossing the One-Mile Creek at mid-way. The trail enters DOC administered land in the top section which affords panoramic views across Lake Whakatipu before descending back towards Queenstown. Part of the trail has been realigned to establish an easier uphill bike trail to the downhill trail McNearly Gnarly. Other bike trails cross the Fernhill Loop Trail in several areas.

**Facilities:** 'McGazza' picnic table lookout

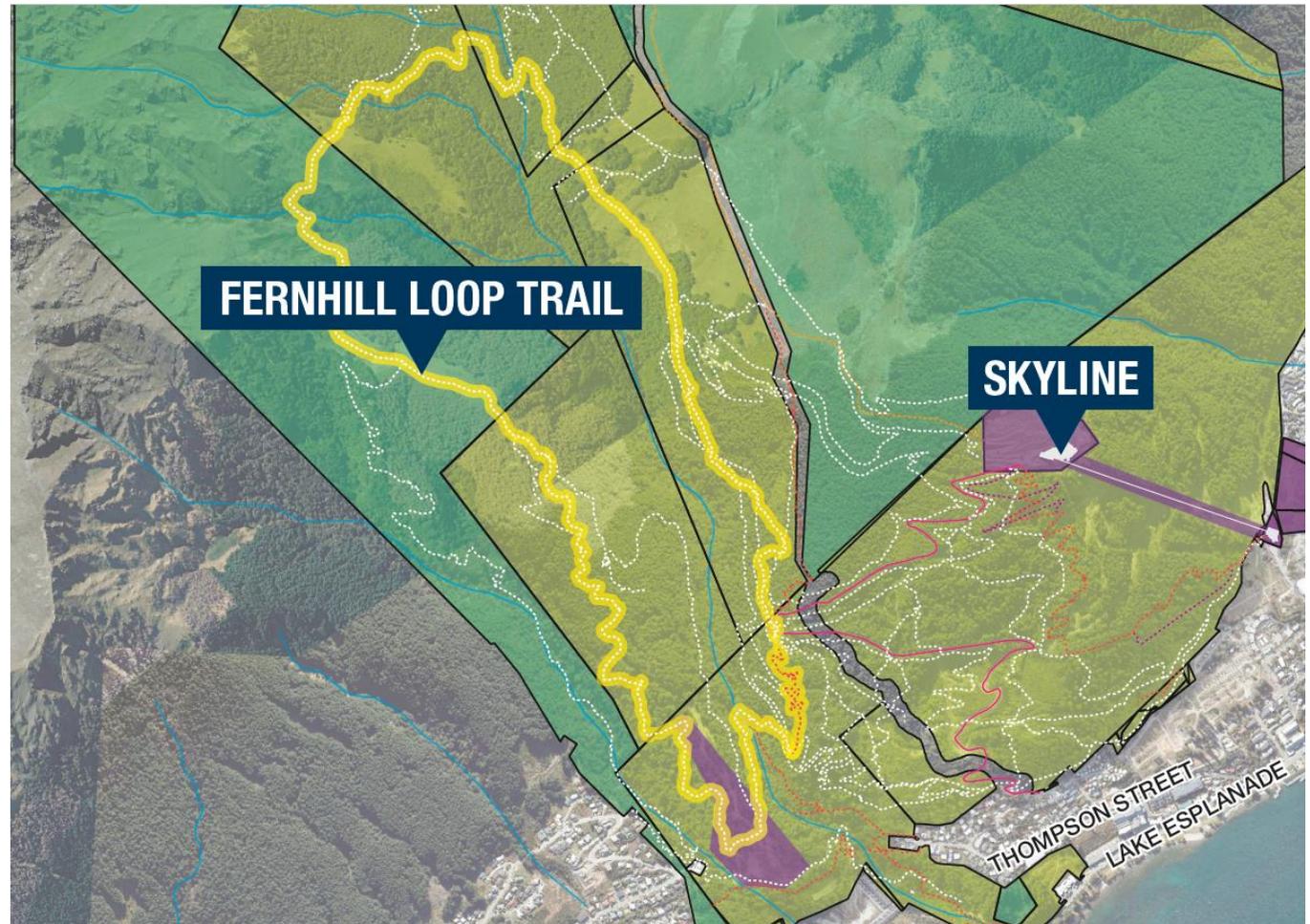
**Objective:**

**13.1.3.1** To manage the Fernhill Loop trail as a high-quality dual use recreation loop trail.

**Policies:**

**13.1.3.2** Retain as a dual-use, bi-directional trail for walkers, bikers and runners.

**13.1.3.3** Ensure the Fernhill loop is maintained to the suitable standard and recognised within the network of trails.



Map of Fernhill Loop Trail

### 13.1.4 Ben Lomond Mountain Bike Trails

**Description:** The Ben Lomond Mountain Bike Trails (BLMBT), formerly known as the Queenstown Bike Park, are located on the southeastern face of the Te-Taumata-o-Hakitekura Ben Lomond reserve. BLMBT contains over 30 mountain biking trails, ranging from beginner to expert, which total over 30 kilometres of riding and 450 metres of vertical descent. The Queenstown Mountain Bike Club (QMTBC) is a community volunteer group that is largely responsible for the original development of the mountain biking tracks on Te-Taumata-o-Hakitekura Ben Lomond.

The trails are maintained by QLDC with funding from Skyline and volunteers from the QMTBC. Skyline adapted their existing gondola to uplift mountain bikes in 2011. Access to the park is via the Skyline Gondola, or up the Access Road off Lomond Crescent. BLMBT are widely considered to provide a worldclass biking experience and contributes to the Queenstown economy.

A mature forestry canopy protects trail surfaces as it reduces water damage and decreases trail deterioration from users. The implementation of a forestry plan to remove Douglas fir from the Reserves will modify the trail network and experience. Consideration will have to be given to the bike trail network when the vegetation removal occurs.

**Facilities:** Directional and trail grade signage.

**Total area:** 100 hectares

**Objectives:**

**13.1.4.1** To ensure the Bike Trails are managed as a national and international destination mountain bike network.

**13.1.4.2** To ensure further development of the mountain bike trail network occurs in a sustainable manner and other users are not displaced such as walker, runners and, conservation groups.

**Policies:**

**13.1.4.3** Consider the development of an uphill trail from Lomond Crescent.

**13.1.4.4** Program regular trail audits and implement the recommended actions.



Map showing BLMBT Bike Trails - marked white

### 13.1.5 Midway Clearing

**Description:** Midway Clearing is the central point in the BLMBT where the majority of the trails meet and connect including the Fernhill Loop Trail and the popular but informal alternative walking access (that bypasses the Skyline upper terminal) to Ben Lomond. It can also be accessed from the Access Road. The area contains very basic recreation infrastructure and would benefit from additional facilities.

**Facilities:**

- Signage,
- Picnic tables,
- Bike tools
- Water tap

**Objectives:**

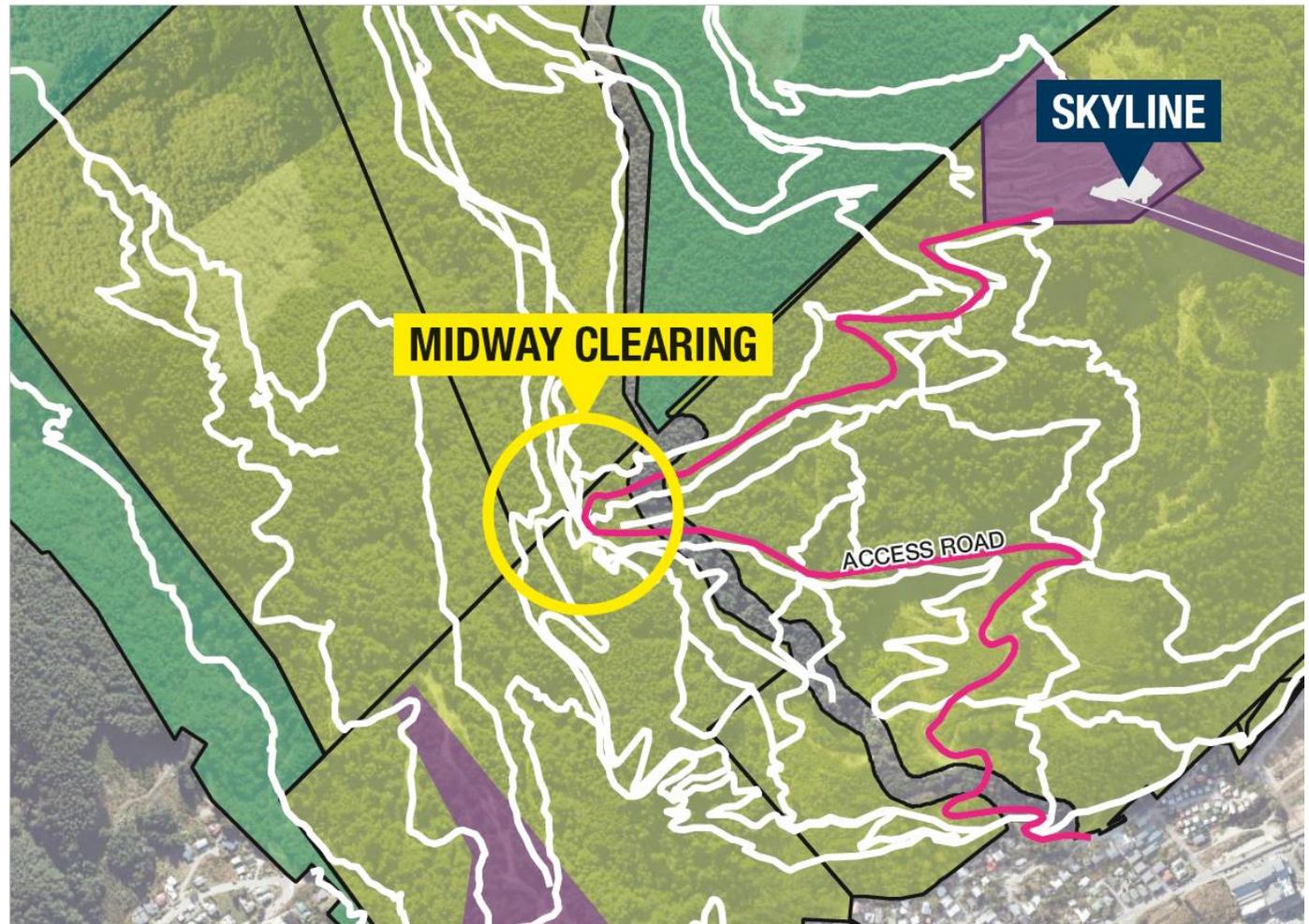
**13.1.5.1** To acknowledge the Midway clearing as a key recreation area with recreation infrastructure in this location for bikers, walkers and runners.

**Policies:**

**13.1.5.2** Enable development of information and recreation hub for walkers and bikers.

**13.1.5.3** Consider formalising section of track to the Ben Lomond summit formerly maintained by DOC above Midway Clearing.

**13.1.5.4** Consider installing public toilets.



Map showing the location of Midway Clearing

### 13.1.6 Tiki Trail and Upper Brecon Street Reserve Entrance

**Description:** The Tiki Trail is a very popular walking trail that leads from the Queenstown Cemetery to the beginning of the Ben Lomond Trail. It provides walking access to Bob's Peak, as an alternative to the Skyline Gondola. The main entrance to the Tiki Trail is from the Queenstown Cemetery adjacent to Upper Brecon Street and the Skyline lower terminal building.

The trail is steep and technical winding its way through trees including an original remnant beech forest towards the lookout at the top of Bob's Peak and provides access to the Taumata-o-Hakitekura Ben Lomond Summit Trail.

The trail is approximately 2.1 kilometres in length and gains approximately 450 metres elevation. The entrance area has recently changed as a result of upgrades to Brecon Street which improved pedestrian access but removed parking opportunities for reserve users. There is limited wayfinding signage to direct users to the start of the trail.

**Facilities:** Signage.

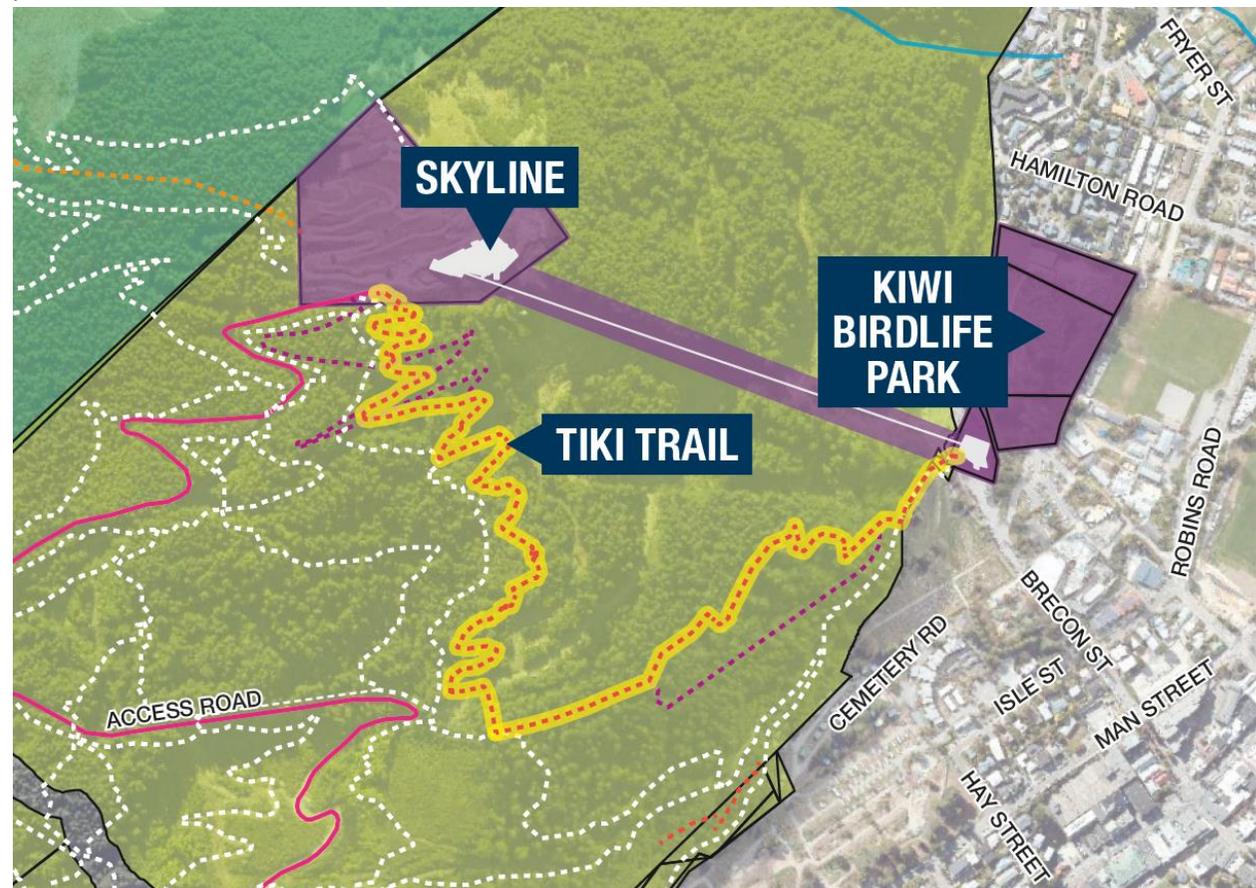
#### Objectives:

**13.1.6.1** To recognise the Tiki Trail as the primary walking trail on Te-Taumata-o-Hakitekura Ben Lomond Reserve.

**13.1.6.2** To recognise and upgrade the Tiki Trail entrance area as one of the primary walking access points into the reserve.

#### Policy:

**12.1.6.3** Prioritise opportunities for sharing Kāi Tahu associations and connections (past, present and future) to provide a full expression of cultural identity for users of the Tiki trail.



Map of the Tiki Trail

### 13.1.7 One Mile Reserve Entrance

**Description:** A current arrival area to the Te-Taumata-o-Hakitekura Ben Lomond reserve. The entrance is from the Fernhill roundabout, providing access to the historic One Mile Pump Station and the One Mile Creek walking trail.

The One Mile creek walking trail a technical track through remnant beech forest and Douglas fir to the subalpine and alpine zones higher up in the Reserve. There has been water damage to the lower section of the track.

**Facilities:**

- Car parking (~20 spaces)
- Signage

**Total area:** 6,000m<sup>2</sup> (including the access road and car park area)

**Objective:**

**13.1.7.1** To ensure the One Mile is recognised as a formal arrival area into Te-Taumata-o-Hakitekura Ben Lomond Reserve.

**Policies:**

**13.1.7.2** Protect the One Mile Pump Station Heritage values.

**13.1.7.3** Consider installing public toilets.

**13.1.7.4** Consider upgrading the entrance road and carpark to cater for more vehicles.

**13.1.7.5** Support the development of a new dual use uphill-trail near One Mile to connect to the existing network.



Map showing the location of One Mile Entrance

## 13.2 Te Tapunui Queenstown Hill

### 13.2.1 Kerry Drive Jump Park and Reserve Entrance

**Description:** Reserve arrival area at the end of Kerry Drive with a purpose built pump track and bike jump park, under licence to the QMTBC. The pump track, built in 2021 is a dual clay loop track that allows two riders to ride on the track at once side by side.

**Facilities:**

- Bike pump track.
- Car parking (~25 spaces),
- Water fountain
- Toilets

**Total area:** 3.17 hectares

**Objectives:**

**13.2.1.1** To manage the Kerry drive jump park as a licenced area.

**13.2.1.2** To consider and develop Kerry Drive as the primary arrival entrance into Te Tapunui Queenstown Hill reserve, that would include the realignment of the start of the Queenstown Time Walk.

**Policies:**

**13.2.1.3** Consider providing additional recreation facilities such as picnic tables, rubbish bins.

**13.2.1.4** Allow for upgrades and agreed changes to the pump track.



Map showing the location of Kerry Drive jump park

### 13.2.2 Te Tapunui Queenstown Hill Time Walk

**Description:** The Time Walk is a well utilised walking trail that leads up Te Tapunui Queenstown Hill to the Basket of Dreams sculpture and viewpoint, with spectacular scenery and extensive views of Lake Whakatipu, the Remarkables and Te-Taumata-o-Hakitekura Ben Lomond.

Interpretive panels spaced along the length of the trail explain the history of Tāhuna Queenstown. The Time Walk commences at Belfast Terrace and enters private land approximately 1.5km along the trail.

Further walking trails lead from the Basket of Dreams to Te Tapunui Queenstown Hill summit, which is located on private farmland, to obtain 360 degree panoramic views of the Whakatipu Basin.

**Facilities:** Existing small car park on Belfast Terrace (~5 spaces).

**Total area:** Length of trail approximately 3.7 kilometres (to the Basket of Dreams and loop back).

**Objective:**

**13.2.2.1** To preserve the Time Walk as the primary walking (only) trail on Te Tapunui Queenstown Hill Reserve.

**Policies:**

**13.2.2.2** Prioritise opportunities for sharing Kāi Tahu associations and connections (past, present and future) to provide a full expression of cultural identity for users of the Time Walk.

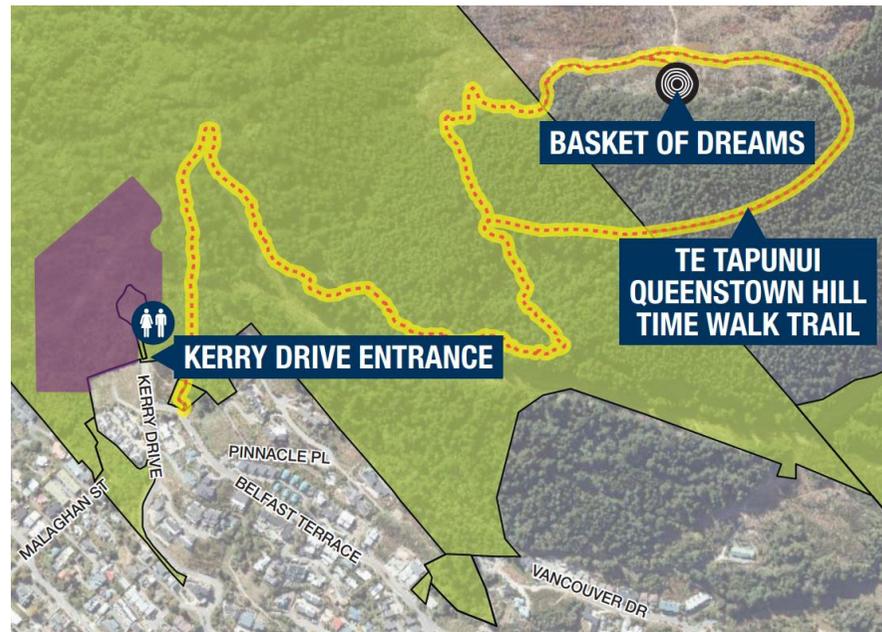
**13.2.2.3** Establish and maintain view shafts through the vegetation at various points along the track to provide views over the township and Whakatipu Basin – to be retained through the revegetation of Te Tapunui Queenstown Hill.

**13.2.2.4** Consider the realignment of the Time Walk track to start from the Kerry Drive carpark arrival area.

**13.2.2.5** Ensure the protection of the tarns on the top of Te Tapunui Queenstown Hill from wilding conifer spread, inappropriate uses and other threats such as informal walking access.

**13.2.2.6** Consider a link to Highview Terrace and Tree Tops Rise, to enable additional pedestrian access.

**13.2.2.7** Consider a new walking trail from Matakauri Wetlands to Te Tapunui Queenstown Hill.



Map showing Te Tapunui Queenstown Hill Time Walk

### 13.3 Proposed Reserve Entrances

The following areas are not currently established but are considered to be important future arrival areas to cater for future residential growth in the vicinity and increased visitor demand on Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill reserves. All new arrival areas present opportunities for cultural integration of Kāi Tahu values within the reserves.

#### 13.3.1 Te-Taumata-o-Hakitekura Ben Lomond Reserve - Lakeview Development

**Description:** The Lakeview development is adjacent to Te-Taumata-o-Hakitekura Ben Lomond Reserve. The development will transform the former Lakeview Campground into a mixed use zone that will offer high density residential buildings, hotels, co-working and co-living spaces, hospitality and retail.

The site comprises of a central public plaza and a recreation reserve. It is important to integrate the Lakeview development into the Te-Taumata-o-Hakitekura Ben Lomond reserve with strong public access links.

A new arrival area should be established which provides key recreation infrastructure adjacent to the Ben Lomond Reserve,

#### Objective:

**13.3.1.1** To establish a reserve entrance to Te-Taumata-o-Hakitekura Ben Lomond reserve in this location, providing car parking for reserve users, connections to future walking and biking trails, play opportunities, water fountains, toilet facilities and signage. This will be a key entrance into the reserve for the Queenstown town centre. This location may also be a future link to the Tiki Trail and Ben Lomond Bike trails.

#### Policies:

**13.3.1.2** Consider establishing a formal Reserve entrance from the Lakeview development.

**12.3.1.3** Consider a new link walking trail from Lakeview which would connect into the Tiki trail .

**12.3.1.4** Establish connections into the Lakeview development (for walkers, runners and bikers).



Map showing proposed Lakeview Reserve Entrance

### 13.3.2 Te Tapunui Queenstown Hill - Tree Tops Rise

**Description:** The Silver Creek residential development will be established over the coming years. It is important to provide a public access link between this site into the Te Tapunui Queenstown Hill Reserve, and an arrival area should be established which provides key recreation infrastructure in this location.

**Objective:**

13.3.2.1 To establish an arrival area to Te Tapunui Queenstown Hill Reserve in this location, providing car parking, connections to future walking and biking trails, water fountains, toilets facilities and signage. This will be a key entrance into the reserve for the majority of Goldfield Heights, in addition to the future residents of Silver Creek.

**Policy:**

13.3.2.2 Consider establishing a formal Reserve entrance from the Tree Tops Rise or in the vicinity.



Map showing proposed Tree Tops Rise Entrance

## 14. POLICIES

The following policies are the actions that support the objectives. They outline how to achieve the goals. They are clear, informed, inclusive and achievable. Policies support the objectives pertaining to both reserves:

### 14.1 Kāi Tahu Partnerships

14.1.1. Identify ways to give effect to partnering with Kāi Tahu on the planning and management of the reserves, that takes account of tikanga and enables practical expression of kaitiakitanga, including identifying and assessing mana whenua values, sites and landscapes of significance and understanding how these are best protected and enhanced.

14.1.2. Explore opportunities to support mana whenua associations, connections (past, present and future) and the expression of Kāi Tahu identity within the reserves including:

- a. interpretation panels and pūrakau (storytelling).
- b. involvement in restorative programmes, including incorporation of mātauranga.
- c. incorporating mana whenua design principle in reserve developments and wayfinding

- d. supporting customary practices, including mahika kai.
- e. Supporting the principles of Te Mana o Te Wai through ensuring activities within the reserves do not adversely affect the mauri of the waterbodies within and connected to the reserves.

### 14.2 Effective Cross Organisation Management

14.2.1. Collaborate with DOC to rationalise reserve boundaries potentially through land swap or other mechanisms.

14.2.2. Cooperate with organisations or volunteer groups where such partnership results in achieving the objectives and outcomes sought in this Plan.

14.2.3. Continue to engage with key stakeholders on the aspirations and priorities for the reserve.

### 14.3 Natural Values / Hazards

#### Landscape Protection Forestry

14.3.1. Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas fir.

14.3.2. Develop and implement a forestry plan for Te-Taumata-o-Hakitekura Ben Lomond Reserve that provides a staged approach to the removal of Douglas Fir and other invasive exotic species followed by a revegetation programme.

14.3.3. Recognise that forestry plans need to consider:

- a. minimal impact on amenity values through the use of low impact extraction methods, while recognising the long-term goal of restoring the natural environment and enhancing biodiversity values.
- b. allowing for revegetation with a mix of native and non-invasive exotic species.
- c. acknowledgement that some of the commercial recreation operators on the reserve have consent conditions which require vegetation to screen their activity to minimise the visual impact of their infrastructure.
- d. identification areas of remnant beech forest and other native vegetation for protection and enhancement.
- e. pest plant and animal control.
- f. Acknowledgement of recreation values, ensuring important reserve connections remain accessible where possible.

14.3.4. Apply a cross-organisational approach in the management of vegetation in the

reserves and where possible, work with adjoining landowners to reduce natural hazard risks and pests.

### **Biodiversity**

- 14.3.5. Survey and map specific areas of existing native vegetation.
- 14.3.6. Develop a protection programme for the mapped areas of existing native vegetation.
- 14.3.7. Undertake ecological restoration programmes, in conjunction with the relevant Community groups and Stakeholders that target:
  - a. Gully areas with existing native bush, through active control of wildings and other weed species together with revegetation that expands the native species coverage.
  - b. High use areas such as along walking tracks and in the vicinity of the gondola facilities and easement.
  - c. Around the lower boundaries of the reserve, where access and native plant establishment is likely to be easier.
  - d. An ongoing programme of wilding conifer control as resources permit.

### **Pest Management**

- 14.3.8. Undertake pest control programmes on the reserves, recognising the Otago Regional

Council's Pest Management Plan and giving priority to:

- a. Collaborating with Department of Conservation, the Otago Regional Council and relevant adjacent landowners to co-ordinate and compliment efforts.
  - a. Reserve areas where volunteer groups provide capacity to deliver programmes.
  - b. Targeting the management of the goat, deer, possum and hare populations.
- 14.3.9. Enabling pest animal control through supporting the work of volunteer trapping organisations.

### **Fire**

- 14.3.10. Actively implement and regularly review the QLDC 'Activity controls to manage wildfire risk within reserves'.
- 14.3.11. Allow for reserve closures to mitigate risk for reserve users.
- 14.3.12. Support the removal and/or modification of vegetation to reduce the likelihood of a wildfire.

### **Infrastructure**

- 14.3.13. Support the relocation, undergrounding or decommissioning of powerlines within the reserves.

- 14.3.14. Permit the placement and maintenance of utility services where the reserve will not be materially altered or permanently damaged, and the ability of the public using the reserves will not be permanently or adversely affected.

- 14.3.15. Site underground utility services to avoid existing and potential features, including trees and waterways.

### **Rockfall and Debris Flow**

- 14.3.16. Before undertaking any vegetation removal or land use change, assess the effects of natural hazard risk.

- 14.3.17. Ensure any vegetation removal or change of land use considers natural hazard risk of the Brewery Creek and Reavers Lane alluvial fans.

- 14.3.18. Where practicable, protect the provision of public recreational access to the reserves when enabling hard engineering structures where necessary to manage natural hazard risk.

## **14.4 Heritage Values**

### **Heritage Protection**

- 14.4.1 Sites of historical significance will be protected, preserved and maintained as resources permit.
- 14.4.2 Any development work carried out on, or adjacent to, historic structures shall be sympathetic to their historical context and carried out in liaison with Heritage New Zealand Pouhere Taonga and Kāi Tahu.
- 14.4.3 Work (repairs, maintenance and alterations) carried out on historic structures will be informed and carried out by appropriately skilled consultants and contractors and be in accordance with the principles of the International Council on Monuments and Sites New Zealand Charter for the Conservation of Places of Heritage Value.

## 14.5 Recreation and Use

### Recreation Use and Enjoyment

- 14.5.1. Enable recreation use and enjoyment of the reserves through:
  - a. Supporting events, programmes and authorised commercial activities that promote suitable uses of the reserves.
  - b. Providing opportunities that may broaden reserve user's experiences, such as interpretation or public art.

- 14.5.2. Provide for and manage the impacts of recreational use through a range of mechanisms, including, but not limited to:
  - a. Utilising codes of conduct, reserve permits, licences to set parameters or conditions on activities.
  - b. Requiring the authorisation of activities that have the potential to impact the reserves' values or other reserve users.
  - c. Ensure that nominated trails are assigned and designed for walkers and runners.
  - d. Restrict development, commercial activities, formal trails and recreational activities on the eastern side of gondola easement in the Te-Taumata-o-Hakitekura Ben Lomond Reserve, due to the topography, accessibility and the presence of natural hazards.

### Recreational Hang gliding and Paragliding

- 14.5.3. The use of Te-Taumata-o-Hakitekura Ben Lomond Reserve for informal hang gliding and paragliding is only permitted on the designated area to the east of the Gondola (G756) on the DOC administered Scenic Reserve. To fly from the site users must be:
  - a. an accredited pilot,
  - b. member of the Southern Hang Gliding and Paragliding Club,
  - c. obtain a permit to fly, and

- d. comply with the conditions of the MOU between the Southern Hang Gliding and Paragliding Club and Queenstown Air Traffic Services.

### Drones

- 14.5.4. Recreational drone flying is not permitted.
- 14.5.5. The use of drones for filming on the reserves will only be authorised by way of film permit from QLDC.
- 14.5.6. The use of drones for other commercial work on the reserve will require a reserve permit from QLDC.

### Commercial Use

- 14.5.7. Recognise the continued operation of existing leases on the reserves, as set out in Appendix 3, within their current footprints, being:
  - a. Skyline Enterprises (including upper and lower terminal buildings, luge tracks and gondola corridor)
  - b. Ziptrek Ecotours (12 towers and 6 ziplines)
  - c. AJ Hackett Bungy (Ledge Bungy and Swing)
  - d. G-Force Paragliding
  - e. Kiwi Birdlife Park

- 14.5.8. Consider additional commercial recreation activities on Te-Taumata-o-Hakitekura Ben Lomond only where they are compatible with the reserves wider values and in accordance with policy 14.5.10 below.
- 14.5.9. Limit commercial activities on Te Tapunui Queenstown Hill, only considering activities that would require limited facilities, have minimal impact on the natural quietness of the reserve and be in accordance with policy 14.5.10 below.
- 14.5.10. Consider the granting of new commercial lease or licence agreements, or the renewal of existing lease and licence agreements, that:
- Are consistent with the reserve's classification and any reserve specific policies set out in the special management zones in section 6.
  - Do not adversely detract from the general character and amenity of the reserve and other reserve users.
  - Allows recreation activity that uses the unique topography of the reserve to improve the public use and enjoyment.

- Ensure commercial operators contribute to improved environmental outcomes on the reserves.

14.5.11. Prohibit motorised recreation activity on the reserves such as motorbikes<sup>1</sup> and off-road vehicles that comprise safety, damage trails and impact on of the quiet enjoyment of the reserve.

14.5.12. Prohibit motorised recreation flying activity on the reserves, such as micro- light launching or similar powered flight activities that comprise safety and impact on the quiet enjoyment of the reserve.

14.5.13. Helicopter landings will be restricted to those required for reserve operational purposes, such as wilding conifer control, tree removals, pest control, search and rescue and fire control.

14.5.14. Commercial agreements will specify:

- the nature of the activities the operator can provide
- the area within which the activity can be carried out
- the times (over the year and during the day) which the activity can operate

- the signage (if any) permitted in association with the activity
- the fee and/or bond required, and
- that the agreement in non-transferable.

### **Mountain Biking**

14.5.15. Enable licencing of commercial mountain biking operators to provide guiding and/or coaching on the reserves, taking into consideration safety of reserve users and capacity of the trail network.

### **Ziptrek**

14.5.16. Work closely with Ziptrek around the wilding conifer removal and ongoing forestry operations in the vicinity of their existing lease area.

### **Bungy**

14.5.17. Enable renewal of AJ Hackett Bungy's infrastructure, and work closely with them over the wilding conifer removal, ongoing forestry operations and replanting, in the vicinity of their lease area.

### **Community Leases and Licences**

<sup>1</sup> e-bikes or 'power assisted cycles' are defined by Waka Kotahi | NZ Transport Agency (NZTA) as, "a power assisted cycle that has an auxiliary electric motor with a maximum power output not

exceeding 300W and is designed to be primarily propelled by the muscular energy of the rider".

- 14.5.18. Establish lease and licence agreements with community groups where the activity will:
- activate the reserve and/or assist the public use and enjoyment of the reserve and not disadvantage other users
  - be consistent with the reserve's classification and any reserve specific policies set out in the special management zones.
  - not adversely affect the general character and amenity of the reserve.
  - Where appropriate, enhance biodiversity and/or natural values within the reserve.

### Events

- 14.5.19. Permit the use of the reserves for cultural, community and recreational events where the assessment of these has considered:
- Whether the scale of the event is appropriate to the capacity of the site.
  - whether the event will not compromise the primary function of the reserve area, unduly impact the established users of the reserves or high level of informal visitation in some areas.
  - the requirement for rest periods for popular event locations so the grounds/tracks can recover.

- the location and timing of the event is appropriate considering the wildfire risk level.

- 14.5.20. Permit the use of the Ben Lomond Mountain Bike Trails and Wynyard Jump Park, Kerry Drive Jump Park for mountain bike events, provided the conditions of policy 14.5.19 above are met.

### Grazing

- 14.5.21. Allow licensing of managed grazing within the reserves where the grazing may prevent the establishment of invasive species such as wilding conifers and does not impede regeneration of native biodiversity.

### Encroachment

- 14.5.22. Ensure adjacent residential properties and leases do not encroach into the reserves by extending landscaping, lawn areas and structures beyond reserve boundaries, or using the reserve for the storage of property.

### Freedom Camping

- 14.5.23. Manage freedom camping as an ongoing issue and install mechanisms to restrict this, for example consider lockable gates at reserve entrances.

## 14.6 Infrastructure and Reserve Development

### Reserve Development

- 14.6.1. Consider the development of built structures, as necessary, to provide for the function and support of formal and informal recreation activities on the reserves.
- 14.6.2. Encourage a collaborative and non-exclusive use of built structures, to minimise the built footprint on reserves.
- 14.6.3. Ensure the design, colours and materials used on buildings and structure are of a high quality and do not detract from the character or amenity of the reserves. Buildings shall be supported by landscaping if appropriate, to ensure that they enhance the character of the reserves.
- 14.6.4. Ensure any future building and/or infrastructure development within the reserves are designed to mitigate the effects of natural hazards including erosion, falling debris, subsidence, inundation and slippage.
- 14.6.5. Allow for establishing public car parking, rubbish bins, public toilets and shelters on the reserves to meet the needs of reserve users. This infrastructure shall be strategically established in arrival areas,

and only where required within the reserves.

### **Biking and Walking Tracks**

- 14.6.6. Work with the key stakeholders to develop and implement a Trail Masterplan that formalises the mountain bike trail network. This will include:
- a. Identification of the existing trail network and categorise:
    - i. Pedestrian/walking only trails
    - ii. Dual use trails
    - iii. Mountain Bike Trails
  - b. Identify where new trail connections could be developed and where unauthorised tracks can be closed and remediated.
  - c. Pedestrian/walking only tracks that include:
    - One Mile trail
    - Tiki Trail (including a buffer),
    - Te Tapunui Queenstown Hill Time Walk,
  - d. Grading of all mountain biking tracks.
  - e. Development of trail maintenance guidelines, which minimise impacts on landscape, and biodiversity and are

guided by effective standards relating to track grading, design and construction.

- f. Inclusion of a review date within the trail masterplan.
- 14.6.7. Require the written approval of any new trail development by QLDC, who will assess:
- a. relocation of a trail due to disturbance from wilding conifer control/harvesting and revegetation.
  - b. the location of the trail and its impact on native vegetation.
  - c. the extent of tree removal or pruning required.
  - d. the volume of earthworks required and any potential impact on exacerbating rock fall or debris flow.
  - e. the construction and the consideration of hand-built tracks or machine-built tracks.
  - f. site remediation requirements
  - g. the grade of the trail and whether this adds variety to the existing trail network.
- 14.6.8. Actively discourage unauthorised trail building and use.
- 14.6.9. Remove and rehabilitate unauthorised tracks and trails.

### **Access / Reserve Entrances / Carparking**

- 14.6.10. Facilitate reasonable access to as many areas of the reserves as possible for persons with restricted mobility, balanced with maintaining and enhancing the naturalness and values of the reserves and the cultural values identified by Kāi Tahu.
- 14.6.11. Encourage active travel to the reserves through the provision of new trail connections, bike parking and other necessary facilities.
- 14.6.12. Provide opportunities for cultural integration of Kāi Tahu values throughout the reserves and particularly at the reserve entrances.
- 14.6.13. Review car parking provision at reserve entrances to improve access to the reserves.
- 14.6.14. Ensure public recreation access along the existing access road to Bob's Peak and upper Skyline Gondola terminal is preserved.

### **Signage, Wayfinding, Communication, Interpretation, Story Telling**

- 14.6.15. Continue to review and update signage in conjunction with reserve developments and the implementation of the track

network masterplan to encourage exploration of the reserves, improve the visitor experience and keep users safe.

14.6.16. Ensure signs:

- a. meet Council guidelines
- b. combine where appropriate and are the minimum necessary to clearly convey the message to reduce clutter and maintenance
- c. attach to buildings or structures where practical.

14.6.17. Establish and provide improved signage for information, orientation and wayfinding within the reserves.

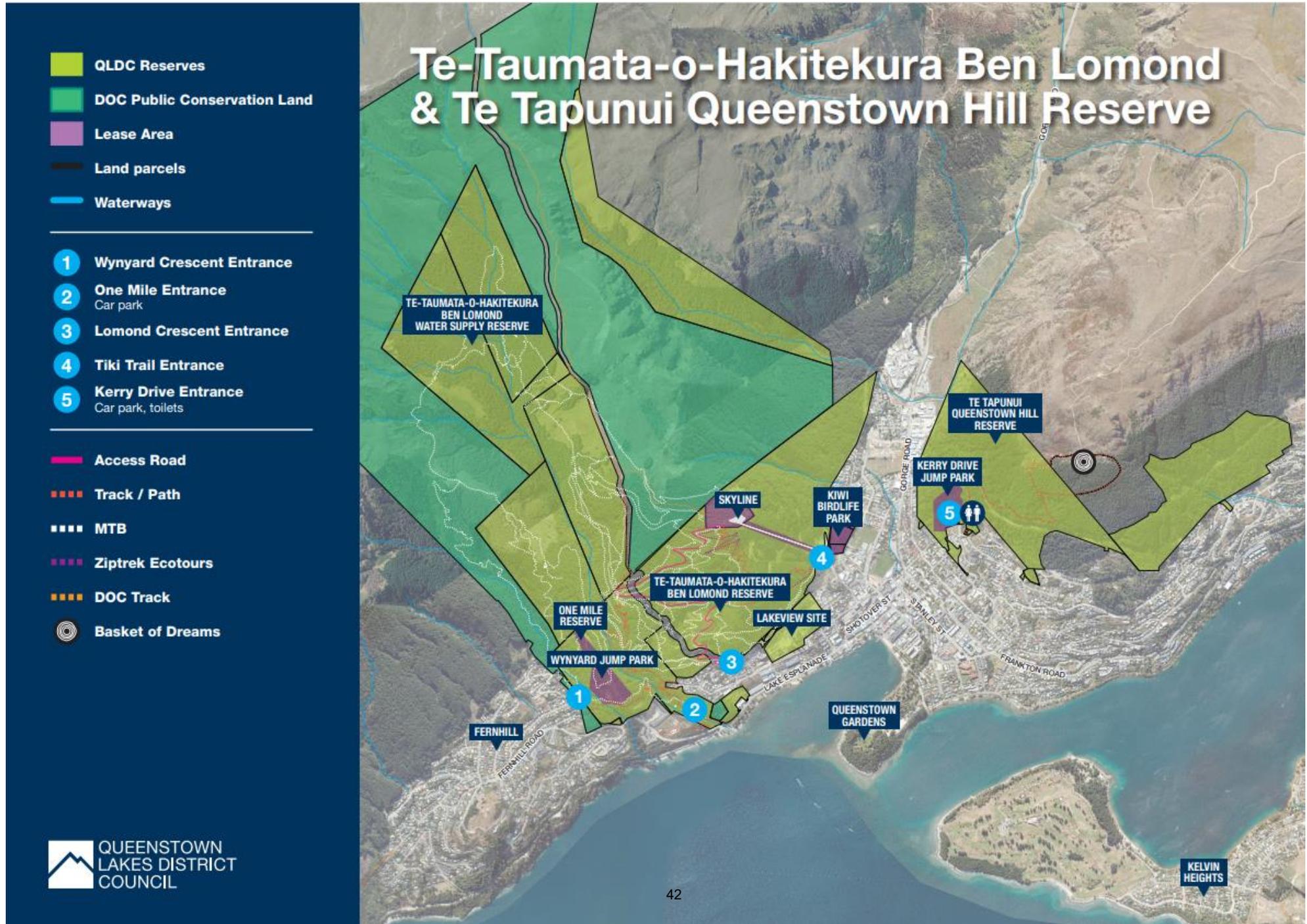
14.6.18. Consider the installation of appropriate small-scale sponsorship signage in high use locations, where this is acknowledging significant financial contributions to the reserves' development or restoration.

14.6.19. Provide opportunities for cultural integration of Kāi Tahu values in reserve signage.

14.6.20. Develop further interpretation in the reserves that tells stories of the history of the land, Kāi Tahu and formation and development of the reserves, and engages the public in the importance of restoring the landscape.

14.6.21. Encourage improved communication and education within the reserves and consider apps, signage and other monitoring systems to make more information readily available to the public.

# APPENDIX 1 - Reserve Map



## APPENDIX 2 - Legal Descriptions

### Te-Taumata-o-Hakitekura Ben Lomond

Referred to as	Record of Title	Legal Description	Classification	Area
Bob's Peak Recreation Reserve	OT109/294	Section 19 Block XX Shotover Survey District and Section 20 Block I Mid Wakatipu Survey District	Recreation Reserve	164.29 Ha
Water Supply Reserve	OT109/95	Section 4, Section 10, Section 14 and Section 19 Block I Mid Wakatipu Survey District and Section 1-2 Block VIII Mid Wakatipu Survey District	Reserve for water supply	175.61 Ha
Water Supply Reserve	OT124/234	Section 3 Block VIII Mid Wakatipu Survey District and Section 72 Block XX Survey District Shotover	Water Reserve	55.24 Ha
Kiwibird Life Park	OT9B/770	Section 129 Block XX Shotover Survey District and Section 1 Survey Office Plan 24407 and Part Section 131 Block XX Shotover Survey District	Recreation Reserve	2.32 Ha
Kiwibird Life Park	185162	Lot 2-4 Deposited Plan 345184 and Section 1 Survey Office Plan 22971 and Part Section 131 Block XX Shotover Survey District	Recreation Reserve	1.19 Ha
Reserve area adjacent to Kiwibird Life Park	185161	Lot 1 Deposited Plan 345184	Recreation Reserve	0.16 Ha
Queenstown Commonage Reserve Management Act 1876	Nil	Section 106 XX Shotover Survey District	Commonage Reserve	11.84 Ha
Queenstown Commonage Reserve Management Act 1876	Nil	Part Section 105 Block XX Shotover Survey District	Commonage Reserve	7.09 Ha
Entrance to Wynyard Jump Park	Nil	Section 2 Survey Office 317363	Commonage	0.19 Ha
One Mile Historic Pump Station	Nil	Section 1 Survey Office 24350	Recreation Reserve	1.06 Ha
<b>Total area</b>				<b>418.99 Ha</b>

## Te Tapunui Queenstown Hill

Referred to as	Record of Title	Legal Description	Classification	Area
Te Tapunui Queenstown Hill Reserve (containing the entrance to the Te Tapunui Queenstown Hill Time Walk)	569609	Lot 4 Deposited Plan 447835	Recreation Reserve	6.05 Ha
Te Tapunui Queenstown Hill Reserve	732627	Lot 2 Deposited Plan 496901 and Section 1 Survey Office Plan 503041	Recreation Reserve	61.98 Ha
Te Tapunui Queenstown Hill Reserve	26956	Lot 602 Deposited Plan 306902	Local Purpose Reserve (Beautification)	0.43 Ha
Te Tapunui Queenstown Hill Reserve	109819	Section 2 Survey Office 317364	Conservation	40.66 Ha
Total area				109.12 Ha

## APPENDIX 3 - Lease and Licence Holders

### Lease and Licence Holders

Lease/License Holder	Location
Helibike New Zealand Limited	Te-Taumata-o-Hakitekura Ben Lomond
New Zealand Police	Te-Taumata-o-Hakitekura Ben Lomond
Peak Bungy Limited	Te-Taumata-o-Hakitekura Ben Lomond
Queenstown Commercial Parapenters	Te-Taumata-o-Hakitekura Ben Lomond
Queenstown Mountain Bike Club (Gorge Road)	Te-Taumata-o-Hakitekura Ben Lomond
Queenstown Mountain Bike Club (Wynyard)	Te-Taumata-o-Hakitekura Ben Lomond
The Inside Line Limited	Te-Taumata-o-Hakitekura Ben Lomond
Aotearoa Towers Group t/a Forty South	Te-Taumata-o-Hakitekura Ben Lomond
Spark Limited	Te-Taumata-o-Hakitekura Ben Lomond
Treadmark NZ	Te-Taumata-o-Hakitekura Ben Lomond
Vertigo Bikes Limited	Te-Taumata-o-Hakitekura Ben Lomond
Queenstown Mountain Bike Club (Kerry Drive)	Te Tapunui Queenstown Hill

No.	Name	Organisation	Speak	Postion	Submission on the draft RMP	Attachment B: Full Submissions Pack	Officer comment
1	Adam Copland	Commonage Developments Limited	Yes	Support	My submission, and the submission of Commonage Developments Limited, are as follows: 1.Supportive of the Vision of the plan but believe the balancing of what the reserves provide for may need broadened beyond what is included in the current wording. 2.Fully supportive of the reserves being recognised as wahi tapuna and are further supportive of the reserve management plan being set up and cared for in such a way so as to return the reserves to their original state and protect them long term. 3.There is reference to revegetating the reserve spaces in a way that enables recreational activities consistent with what the Douglas fir canopies provide. It would be better for lower vegetation like shurbs and tussocks to be reestablished to enable sunlight to penetrate and dry areas that are used for recreational activity rather than native species that have the potential to grow very large along with their undergrowth. 4.The Queenstown Hill Reserve plays an important role for recreational pursuits in close proximity to Queenstown and we are supportive of the area being further developed to enable this. This development should be in a controlled manner in terms of what is enabled and in what location. The current situation enables unplanned and undesirable ways for the reserves to be used. In many locations people have taken liberty to develop their own recreational infrastructure which is not desirable. 5.Douglas fir forests are a significant fire risk that need controlled.si 6.Douglas fir are an invasive species and more should be done to reduce the number of them and restrict their spread. 7.Generally supportive of the objectives outlined on the plan but with some reservations that development of the land surrounding the reserve areas will be overly hindered by such wide ranging objectives. The wider Queenstown area is continuing to come under development and growth pressure and the protection of these reserves needs to be done in a way that does not come at the expense of allowing Queenstown to fulfil its development potential. The protection and further utilisation of the reserves should be done in conjunction with sustainable development of the surrounding urban areas. 8.Supportive of clause 13.2.1.2 (in terms of Kerry Drive being the primary access to the Queenstown Hill reserve). 9.Supportive of the matters set out in clause 13.2.2 with reference to Queenstown Hill. 10.Supportive of future access to Queenstown Hill being provided from Tree Tops Rise. 11.We note that Council has agreed to access from Kerry Drive to The Commonage site via an easement through the Queenstown Hill reserve. Supportive of this accessway being created to better enable the objectives and policies of the Plan to be fulfilled by enabling better access to the Queenstown Hill reserve via this easement.		Noted support of wilding pine removal and native revegetation (specifically shrub and tussock species)  Noted support for considered development of Queenstown.  Noted support for formalising the Kerry Drive Reserve entrance further to be the main entrance to Te Tapanui Queenstown Hill Reserve.  Noted support for reserve entrance from Tree Tops Rise.
2	Alex Bulling		No	Support			
3	Amy Wong		No	Support	I am submitting this in support of the draft plan, particularly regarding the Ben Lomond Reserve as a whole. The draft plan is comprehensive and thoughtfully considers the needs of all stakeholders who use the reserve. I do have a few comments on specific aspects that could be considered during the finalisation of the plan: The draft plan does a great job addressing the need for multi-use tracks. However, I would appreciate further attention to the Fernhill to Thomson commuter track. Any improvements that could make this track more aligned with active travel infrastructure would be beneficial. Improving emergency vehicle access, particularly around the Wynyard Crescent bike tracks, is important. Additionally, creating a designated space for helicopter landings, if needed, would be a valuable safety enhancement. It would be helpful to include fire risk signage within the reserve and at the entrance. This would serve as a reminder to visitors who may not be aware of the potential risks. The proposal to include toilets within the reserve is a good idea. However, I suggest considering the option of placing toilets at Fernhill Park, just outside the reserve. This location would not only serve reserve users but also cater to the mountain biking community, local residents, and visitors to the park. Thank you for considering these points.		Noted request for further consideration of Fernhill to Thomspson Street commuter track.  Noted support for emergency helicopter landing site.  Suggestion for toilets in Fernhill Park not applicable as outside reserve area.
4	Amy Wong	Fernhill Sunshine Bay Community Association	No	Support	I am submitting on behalf of the Fernhill Sunshine Bay Community Association and over all the association is in support of the draft plan, particularly regarding the Te-Taumata-o-Hakitekura Ben Lomond Reserve as a whole. The draft plan is comprehensive and thoughtfully considers the needs of all stakeholders who use the reserve. The community does have a few comments and suggestions on specific aspects we hope would be considered during the finalisation of the plan: in no particular order 1. The draft plan does a thorough job addressing the need and management for tracks that consider the needs of all users. However, the community would appreciate further attention to the Fernhill to Thomson st commuter track. This still needs improvements that so that it can be considered part of an active travel network. We would also like for this track to be considered as a high traffic track and would appreciate a maintenance schedule that reflects that. 2. (12.4) Improving emergency vehicle access, particularly around the Wynyard Crescent bike tracks, is important. Additionally, creating a designated space for helicopter landings within the reserve, would be a valuable safety enhancement. 3. (9.3) Reducing the fire risk to the residential area is also a concern the Community would like to see the mature pine trees adjacent to the residential area and Fernhill park, located on the DOC Land addressed. With the mature pine trees taken back to the the at least the edge or reserve 4. (9.3) It would be helpful to include fire risk signage within the reserve and at the entrance. This would serve as a reminder to visitors who may not be aware of the potential risks. 5. The community association and related groups support vegetation management and removal of pest species (both Flora and Fauna) and the inclusion of community groups to assist with this. 6. The proposal to include toilets and a water fountain within the reserve (13.1.2.2, 13.1.5.3) is a good idea. However, we do not support toilets at the one mile entrance (13.1.7.3) as there are existing toilets across on the lake side. It would be more beneficial placing toilets and a water fountain at Fernhill Park, just outside the reserve. This location would not only serve reserve users but also cater to the mountain biking community, local residents, and visitors to the park. 7. (12.4) Improved parking at the Wynyard Bike park entrance (Wynyard Crescent) and at One mile (13.1.74) would improve accessibility. Improved parking at Wynyard Crescent would reduce impact on the residents in that area. Thank you for considering these points.		Noted request for further consideration of Fernhill to Thomspson Street commuter track.  Noted support for emergency helicopter landing site.  Noted support of wild pine removal and predetor control.  Noted opposition to new toilets at One Mile Entrance.  Suggestion for toilets in Fernhill Park not applicable as outside reserve area.  Noted support for improved carparking at Wynyear Crescent and One Mile reserve entrances/
5	Andrew Blackford	n/a	No		See attached pdf submission.		Noted support for mountain biking.  Noted support for expand mountain biking trail network in both reserves.  Consider amendment to 8.2 to remove reference to "Unauthorised".  Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.  Noted opposition to removal wilding trees.

6	Anna Harding-Shaw	Whakatipu Wildlife Trust	No	Support	<p>Whakatipu Wildlife Trust supports the draft Reserve Management Plan for the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves, particularly the vision for a biodiverse landscape.</p> <p>We support the plan for ecological restoration, including the removal of invasive plant and pest animal species, reforestation with mainly native species and the preservation, enhancement and maintenance of remnant native forest. Improved ecological values will provide better native wildlife habitat, with a particular view to providing safe habitat that encourages the return of kea and other taonga species to Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill in the future. Recreational activities should continue to be kept low impact and balanced to reduce any negative effect on wildlife and habitats.</p> <p>In particular we recommend that trapping of non-native predators should be a permitted, encouraged and expanded activity to protect and enhance ecological and biodiversity values. We also recommend feral cats be added to the list of detrimental pest animal species present within the reserves.</p> <p>Maintaining stray cat colonies should be explicitly listed as an unauthorized activity within the reserves. Te Tapunui Queenstown Hill in particular is used as a location for artificially maintaining stray cat colonies. We believe this is an inappropriate use of reserve land and at odds with the QLDC vision of a biodiverse landscape for these reserves. Current stray cat colonies should be phased out with the cats removed and a feral cat management programme put in place.</p> <p>To aid in distinguishing stray/feral and pet cats from each other, we recommend that QLDC implement a requirement for microchipping of all pet cats in our region.</p> <p>Many locals and tourists use Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves for recreation. Telling the story of the history and ecological restoration of these reserves through signage and media campaigns would be a great way to educate the public about conservation in Aotearoa New Zealand and the Whakatipu.</p>	<p>Noted support for wilding pine removal.</p> <p>Noted support for predator control and native revegetation.</p> <p>Consider update to 14.3.8(b) to include feral cats.</p> <p>Noted support for improved wayfinding and informative signage.</p>
7	Ash Peters	WORD (World Off-road Riding Department)	Yes	Support	<p>As a youth mountain bike charity, we provide after school programmes, holiday camps and leadership training for young people 7-17 years old. We LOVE Ben Lomond Reserve and see heaps of potential to use this space for our organisation. While we are just in the early stages of running programmes here, our Wellington location sees 600 kids/ year and the Wanaka location has 200 kids/ year. We know Ben Lomond Reserve will play a huge part in the growth of youth biking.</p> <p>MTB trail development- We are in support of QLDC expanding the trail network in Ben Lomond Reserve. We would love to see more progression of trails (ie. Grade 2 and 3 trails) along with a specific 'learn to jump' area. More signage would also be great! We also are in support of more accessible trails like Skybridge over One Mile creek.</p> <p>Facilities- In order to run a programme or camp, we really do need a toilet and water at the Wynyard entrance to the park. Without a toilet, we have a huge barrier for young women and girls to participate.</p> <p>Funding- We fully support funding to be used on trail maintenance for the upkeep of this amazing community facility.</p> <p>Environmental- We see a huge need for tree management and native planting. As an organisation we would love to help in this space too :)</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in Ben Lomond.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for vegetation managed and native revegetation.</p>
8	Bella		No	Neutral		
9	Ben Bulling		No	Support	<p>Great to see that the plan opens up further opportunities for locals and our visitors to enjoy our reserves.</p> <p>Increased scope keeps interest high and also provides opportunities for local business to earn from the increase revenue.</p>	<p>Noted support for supporting locals to use the reserves.</p>
10	Ben robie		No	Support		
11	Bruce McLeod	Queenstown Mountainbike Club	No	Support	<p>I support the maintenance and expansion of trails and structures within the reserves for walkers, runners, and mountain bikers.</p> <p>In specific regard to 14.5.2.d, I do question the need to restrict development east of the Gondola, as that area, albeit steep, does have some potential for trail development, and particularly to provide a linkage at the base of the hill from the old high school site etc.</p>	<p>Noted support for expanded trail network in both reserves.</p> <p>Consider amending 14.5.2.d to allow some trail development in this area.</p>
12	Cassie Pineau	N/a	n/a	Support	<p>See attached pdf submission.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p> <p>Noted support for wilding pine removal.</p>
13	Chris Grose		No	Neutral	<p>I think all the pine trees should be removed and the area fully re-wilded with natives. A predator proof fence should be erected around the area and managed as such. Tourists could be charged extra to see the booming native fauna and flora. Huge boost for the town and council income, bring NZ back to New Zealand. Be an awesome project.</p>	<p>Noted support for predator control and native revegetation.</p> <p>Noted support for mountain biking.</p>
14	Connor Smith	N/a	N/a	Support	<p>See attached pdf submission.</p>	<p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>

15	Conor Macfarlane		No	Support	<p>I am in support of an expanded trail network but mainly in the trees, the odd trail in the open is alright but I don't see the point in cluttering above the treeline with trails. I don't feel all unofficial trails should be made official though as this will wreck them.</p> <p>Some drinking fountains at key spots would be good, such as Wynyard.</p> <p>I rarely use skyline to access trails but I feel there should be a bike patrol/ medical in place and I believe it should be up to skyline to sort this out. It is a joke that they provide access like they do and then take no responsibility for providing a medical response service.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p>
16	Craig Cox		No	Neutral	<p>I would like to see the development of more mountain bike trails on Ben Lomond and Queenstown Hill Reserves to cater for more recreational opportunities for local and visiting cyclists to the area.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p>
17	Daisy Maddinson	Forward Whakatipu/ Patagonia	No	Support	<p>Overall, I am in support of the RMP for Te-Taumata-o-Hakitekura Ben Lomond &amp; Te Tapunui Queenstown Hill. I agree with the inclusion of Kai Tahu's right to connect and express their identity through their connection to land, water, ancestral names and stories of the reserves. I also agree that they should be able to practice mahika kai, transmit and enhance mātauraka, and maintain economic, cultural, social, and political connections.</p> <p>Te Mana o te Wai is and should be a fundamental value and consideration of any reserve plan as it is fundamental to community wellbeing, especially to mana whenua. I am also in support of pest eradication and wilding pine (douglas fir) removal in the reserves, and agree with sustainable removal and native revegetation of the areas over a timeframe that manages the impact on the local trails and mountain biking recreation. This should also be done in consultation with QMTBC and the local community so that mountain bikers understand and agree with this transition, gaining the knowledge of why this work is vital for the future of Tāhuna Queenstown.</p> <p>I am in support of QMTBC and QLDC expanding the trail networks in the Ben Lomond Reserve and the development of the Queenstown Hill Reserve to accommodate the growing demand for mountain biking. Including creating new progressive trails, improving connections between riding areas, and formalizing unofficial trails. I would especially like to see Queenstown Hill Reserve adopt some of the well-used unofficial trails to create mutual benefit to mountain bikers who can help care and protect these areas.</p> <p>In this vein, I support plans to integrate trail development with environmental restoration efforts, including QMTBC and QLDC collaborating on tree felling and replanting in Queenstown Hill Reserve and the need for effective planning of future biking trails in areas where pine trees are being removed.</p> <p>I am in support of enhancing existing bike facilities, such as installing water fountains, toilets, and bike washdown areas at Wynyard Jump Park, and formalizing the trail network in Queenstown Hill, including plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track. I also support the proposal for safety improvements, such as separating rider and walker traffic on shared trails with bridges/overpasses and advocating for more accessible trail areas like a Skybridge over One Mile Creek to enhance safety and flow.</p> <p>I support the importance of QMTBC aligning their Trail Master Plan with the QLDC Trail Masterplan to ensure coordinated trail development and improved access, including proposals for new uphill trails and trail links from key entrance points like Lakeview and Lomond Crescent.</p> <p>When done in a sustainable, considered way, mountain biking creates healthier, more connected communities that see the value in their natural environment and want to protect it. It creates economic opportunities, domestic and global tourism, and athlete development, as well as a way to integrate recreation into conservation efforts that benefit everyone. I believe that with QLDC + QMTBC's vision passed on to the community, and the community's interest and power to stand behind it, we can transform the Ben Lomond and QT Hill into amazing mixed-use reserves that help prevent natural disasters, cleverly manage water in line with the principles of Te Mana o te Wai, regenerate the soils and native forest, bring back native species and continue to see Tāhuna's mountain bike industry and community flourish alongside it.</p>	<p>Noted support for including Kai Tahu connection and cultural experssion in reserves.</p> <p>Noted support for wilding pine removal.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p>
18	Damon	Endeavour Electric	N/a	Support	<p>See attached pdf submission.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>
19	Damon Commerer	N/a	N/a	Support	<p>See attached pdf submission.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>

20	Daniel Excell		No	Neutral	<p>Trail Expansion and Development: I am in support of QMTBC and QLDC expanding the trail networks in the Ben Lomond Reserve and the development of the Queenstown Hill Reserve to accommodate the growing demand for mountain biking. Including creating new progressive trails, improving connections between riding areas, and formalizing unofficial trails.</p> <p>Upgrading Existing Facilities: I am in support of enhancing existing bike facilities, such as installing water fountains, toilets, and bike washdown areas at Wynyard Jump Park, and formalizing the trail network in Queenstown Hill, including plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track.</p> <p>Collaboration with QLDC: I support the importance of QMTBC aligning their Trail Master Plan with the QLDC Trail Masterplan to ensure coordinated trail development and improved access, including proposals for new uphill trails and trail links from key entrance points like Lakeview and Lomond Crescent.</p> <p>Safety and Trail Management: I support the proposal for safety improvements, such as separating rider and walker traffic on shared trails with bridges/overpasses and advocating for more accessible trail areas like a Skybridge over One Mile Creek to enhance safety and flow.</p> <p>Environmental Integration: I support plans to integrate trail development with environmental restoration efforts, including QMTBC and QLDC collaborating on tree felling and replanting in Queenstown Hill Reserve and the need for effective planning of future biking trails in areas where pine trees are being removed.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expanded mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for trail master plan.</p> <p>Noted support for improved safety, wayfinding and signage.</p>
21	Daniel Milne	N/a	N/a	Support	See attached pdf submission.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p> <p>Noted support for mountain biking.</p>
22	Daniel Shorrocks		No	Neutral	<p>I support QMTBC and QLDC expanding the trail networks in the Ben Lomond Reserve and developing the Queenstown Hill Reserve to keep up with the growing demand for mountain biking. The sport is getting more popular, and it makes sense to create new progressive trails, improve connections between different riding areas, and formalise the existing unofficial trails rather than letting them degrade or become safety hazards. We have a massive opportunity here to become a truly world class MTB destination by expanding our trail network to Queenstown hill, the current approach limiting the reserve to only walkers is disappointing and not making the best use of the reserve. It's an extremely cost effective way of improving Queenstown's appeal as a destination, the amount of infrastructure and investment from the council would be minimal and I believe the economic opportunity is too great to ignore.</p> <p>I also support upgrading existing facilities. It's not just about having more trails, it's about making the whole experience better. Things like adding water fountains which greatly enhances the accessibility of the sport, toilets, and proper bike wash stations at Wynyard Jump Park will greatly enhance the overall experience and attractiveness as an international MTB destination. Formalising the Queenstown Hill trail network, adding dual slalom and jump lines, and asphaltting the Kerry Drive pump track would be a huge step in the right direction.</p> <p>Collaboration between QMTBC and QLDC is key. These trails don't exist in a vacuum, and coordinating efforts through a well-planned Trail Master Plan will ensure better access and connectivity. Proposals like new uphill trails and links from main entry points like Lakeview and Lomond Crescent make a lot of sense and would make the network more user-friendly.</p> <p>Safety and trail management also need attention. Mountain biking is growing, and shared trails don't always work well when you mix riders and walkers. Separating traffic where necessary with bridges, overpasses, or even a Skybridge over One Mile Creek would massively improve both safety and flow.</p> <p>Finally, trail expansion should go hand in hand with environmental restoration. If trees need to be felled, replanting should be part of the plan. QMTBC and QLDC working together on this is essential for keeping these areas sustainable for the long term.</p> <p>If we want Queenstown to remain a top-tier biking destination, we need to invest in making the infrastructure better, safer, and future-proof, as well as working with community groups like QMTBC and allowing them to expand and improve the network.</p>	<p>Noted support for expand mountain biking trail network in both reserves.</p>
23	David Harding-shaw		No	Support	I support the ongoing recognition and protection of the bike tracks in the areas covered as an important aspect to our region. Management of these in a sustainable manner to ensure ongoing longtime use is important.	Noted support for mountain biking.
24	Dayner Patten		No	Support	<p>I support the development of mountain bike trails in these, and in any locations in the Queenstown area.</p> <p>Queenstown is highly regarded in the MTB community world wide, and because of this it brings a great deal to our local economy.</p> <p>With a rapidly growing sport I feel passionate about keeping Queenstown trails at the top of the list, and believe that although the trails are already world class, it is important to progress the trails with the sport to keep it this way.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p>
25	Duncan Kenderdine		No	Support	<p>Fully support a rigorous approach to removal of the exotic plants and replacement with appropriate natives, while continuing to allow some commercial uses of the Reserve.</p> <p>If existing resource consents require screening, then those activities should be rapidly replanting with natives and grace given by the regulator (QLDC) to ensure that is not used as an excuse. A strong wind blast (as seen on the northern south island some years ago) could flatten a number of trees over night, so temporary effects while the trees regrow is a distinct possibility through natural effects or hazards eg forest fire</p> <p>Please note the lease rates should recognize the significance of the revenue stream, ie nil for non profit making (MTB activity) through to significant for the Skyline, particularly as they are likely to be the only operation up there</p>	<p>Noted support for wilding pine removal.</p> <p>Comment regarding leases not applicable.</p>
26	Erin Greene		No	Support	<p>For Ben Lomond Reserve and the development of the Queenstown Hill reserve to accommodate the growing demand for mountain biking.</p> <p>Including creating new progressive trails, improving connections between riding areas, and formalizing unofficial trails.</p> <p>Upgrading Existing Facilities: I am in support of enhancing existing bike facilities, such as installing water fountains, toilets, and bike washdown areas at Wynyard Jump Park, and formalizing the trail network in Queenstown Hill, including plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track.</p> <p>Collaboration with QLDC: I support the importance of QMTBC aligning their Trail Master Plan with the QLDC Trail Masterplan to ensure coordinated trail development and improved access, including proposals for new uphill trails and trail links from key entrance points like Lakeview and Lomond Crescent.</p> <p>Safety and Trail Management: I support the proposal for safety improvements, such as separating rider and walker traffic on shared trails with bridges/overpasses and advocating for more accessible trail areas like a Skybridge over One Mile Creek to enhance safety and flow.</p> <p>Environmental Integration: I support plans to integrate trail development with environmental restoration efforts, including QMTBC and QLDC collaborating on tree felling and replanting in Queenstown Hill Reserve and the need for effective planning of future biking trails in areas where pine trees are being removed.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for environmental restoration.</p>

27 Ferg	No	Support	<p>The Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan</p> <p>Thank you for the opportunity to submit on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the work that has gone into the draft document today and the community engagement that has occurred to date.</p> <p>I am generally supportive of the objectives and policies of the DRAFT Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve (Draft Plan) as they relate to promoting and enhancing recreational facilities and access to the Reserves.</p> <p>However, I am strongly opposed to the following specific parts of the Draft Plan. Further work is required to better align with the wishes of the community and improve outcomes for residents and visitors.</p> <p>Below I provide specific commentary on selected parts the Draft Plan, referencing the relevant sections of the document. Text in italics is taken from the Draft Plan</p> <p>Section 8.2 – Description of Primary Users and Activities - Te Tapanui Queenstown Hill Reserve</p> <p>Unauthorised mountain biking tracks have also been developed with the....</p> <p>Use of the word ‘unauthorised’ has specific legal meaning and context under the Reserves Act 1977 (the Act) that is different to what is inferred in the draft wording. The use of ‘unauthorised’ should be reconsidered.</p> <p>The Draft Plan wording in Section 8 downplays (intentionally?) the existence and significance of the mountain bike trail (MTB) network inside the Queenstown Hill Reserve. The trails, as shown indicatively in the Strava ‘heat-map’ are well established with some having been in-place for 20+ years.</p> <p>The trails are popular as Queenstown Hill Reserve forms one of three (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation) all year, all weather mountain biking areas accessible from Queenstown. The types of trails, natural features present and proximity to the CBD have made this mountain biking area internationally significant.</p> <p>The Draft Plan wording needs to be amended to reflect the actual situation inside the Queenstown Hill Reserve and recognise that many Queenstown residents and international visitors use the trail network for their recreational enjoyment.</p> <p>While acknowledging that these are ‘unsanctioned’ or ‘unofficial’ the Draft Plan should aim to work collaboratively with the MTB community to formalise them, where it is appropriate to do so. New objectives and policies that relate specifically to MTB trails on Queenstown Hill need to be incorporated in Section 13.2 of the Draft Plan. It is not appropriate to turn a blind-eye to the existing trail network solely because sufficient resources haven’t been applied to addressing what is largely an issue of compliance.</p> <p>These proposed changes would better align the Draft Plan with the current (2005) Reserve Management Plan - 11.1.1 (7) that provided for mountain bike trails on Queenstown Hill</p> <ul style="list-style-type: none"> <li>• To exclude mountain bike use within 200 metres of (and including) the Time Walk track and restrict mountain bike use to formed and approved trails.</li> </ul> <p>and align the Draft Plan with the Reserves classified use under The Act as a Recreation Reserve</p> <ul style="list-style-type: none"> <li>• for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside.</li> </ul> <p>Section 13.1.4 – Ben Lomond Bike Trails</p> <p>Consideration will have to be given to the bike trail network when the vegetation removal occurs.</p> <p>The above wording suggests that removal of the exotic species in Ben Lomond is a certainty and only a matter of time before it happens. While I acknowledge that the Draft Plan has been guided by early engagement with the community, I don’t believe the current wording accurately reflects the views of the wider community. Many in the community would be very surprised to hear the trees are to be removed. The significant community back-lash to the damage caused to the Queenstown Cemetery following forestry operations in Ben Lomond Reserve supports this view.</p> <p>Further to this, the wording suggests that removal can be harmonious with maintaining a network of biking trails. This is simply not the case – the presence of biking trails in these reserves is inextricably linked to the established trees that protect them. The terrain is too steep and the soil profile too shallow to support trails without a dense, tree canopy.</p> <p>Section 14.3.1 – Landscape Protection Forestry</p> <p>Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir</p> <p>This section hasn’t been written with the qualifying statements (paraphrased) .... That provide a staged approach... followed by a revegetation programme.. that are found in Section 14.3.2</p> <p>What are the reasons for the urgency behind a forestry plan for Queenstown Hill, why does it not require the more holistic and balanced approach that the Draft Plan suggests Ben Lomond is to receive with its staged approach and revegetation? Many of the issues present on Ben Lomond Hill that warrant staging and revegetation are also present on Queenstown Hill.</p> <p>As written, it suggests that removal of the wilding is paramount above all other community issues and concerns. Is this the case? Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve. That is now becoming overrun with Sycamore, Blackberry and other noxious weeds as there was (is) no plan to facilitate revegetation.</p> <p>Section 14.6.9 - Biking &amp; Walking Tracks</p> <p>Remove and rehabilitate unauthorised tracks and trails</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p>
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Remove and rehabilitate unauthorised tracks and trails

The Draft Plan needs to reflect that many of Queenstown established mountain bike trails started life as unauthorised trails. Many of the best and most frequently used trails in the district are currently 'unauthorised'. There needs to be an amnesty to, where appropriate, allow established tracks to become part of the official track network and preserve a world-class mountain biking destination.

The MTB community is likely to be far more receptive to the conversion of some 'pirate' trails to official trails and the resulting loss of others than blanket removal of 'unauthorised' trails.

Similarly, community buy-in of 'due process' to seek approval prior to building trails will be much greater if the relationship between QLDC and the MTB community isn't sabotaged by an overly heavy-handed approach.

#### General Comments

More generally the language of the Draft Plan leans heavily towards removal of wilding conifers at the expense of reserve users and other tangible benefits to the community. While there are undisputable negative aspects associated with exotic wilding species, they do provide significant recreational, social and economic benefits. These, which are outlined below, are not referred to in the Draft Plan. Perhaps intentionally to suit the narrative, but they need to form part of the holistic discussion about the future of these trees. The financial and non-financial costs associated with their removal needs to be understood and weighed against other strategies such as funding ongoing wilding control management both inside and outside of the reserve.

- As referenced in the Draft Plan the Reserves are mostly, steep, geologically unstable hill-sides and the trees are doing a very economical and aesthetically pleasing job of tying the hillsides together, while protecting the communities below them from rockfall, debris and landslides. The cost associated with engineered rock-fall fences (14.3.18) to provide a similar level of protection to which the trees currently provide is likely to stretch into the tens of millions of dollars, as well as blight the landscape with man-made masses of steel cable and mesh fencing. Is this a cost the community needs to incur? Most would argue we cannot afford it. Either way it is not accounted for in the Draft Plan.
- Two generations of Queenstowners have only ever known Queenstown Hill and Ben Lomond Reserves to be covered by in trees. They are a fundamental part of the iconic backdrop to the town.
- Large parts of both Reserves are assumed to fall under the requirements of the Emissions Trading Scheme. Deforestation of pre-1990 forest is likely to incur costs that are not stated. Have these been calculated and accounted for?

The economic benefits of mountain biking to the community are acknowledged in the Draft Management Plan – but there is no commentary or reflection upon the economic cost associated with removal of the wildings in the Reserves and or removal of MTB trails on Queenstown Hill.

- Recreation – the Draft Plan does a good job of acknowledging the recreational uses and benefits of the reserve. What it does not articulate, is that many of these benefits exist because of or at the least are enhanced by the established trees covering the Reserves
  - o Protection from freeze-thaw cycles. The tree canopy protects the trail networks from the free-thaw cycle that would render most of the trails (walking and biking) unusable in winter months
  - o Significantly reduces trail maintenance and damage from the environment. A relevant example being the Time Walk on Queenstown Hill – which has a smooth surface inside the tree canopy and a rutted out, water damaged surface for the upper portion outside of the forested area
  - o Shading – the benefit that trees provide to shade tracks simply cannot be underestimated. Walking or biking trails on hot summer days is far more enjoyable in the shade of the forest
  - o Transpiration and cooling effect of the forests
  - o Much of the terrain within the Reserves is steep and rocky. It simply cannot support widespread trail networks without the trees managing soil moisture, preventing run-off, and binding the hillside together.
- The carbon sequestration of these forests is significant and measured in the tens of thousands of tonnes per year. As mature trees, their rate of sequestration is high (>25t/ha/yr) and even if the Reserves are re-planted, removal will result in large carbon emissions that will take decades to offset.

The Otago Regional Council Pest Management Plan has wilding conifers in the Progressive Containment Programme. Complete eradication of wilding conifers is therefore not a requirement of regional (or national) management plans and provides the option to maintain selected areas of reserve in forest cover.

#### Conclusion

Ultimately, as a long-term resident and frequent user of both Reserves, I would like the Draft Plan to have a more balanced approach. That acknowledges that our world class mountain bike network has grown, largely organically, inside these established forests as the forests are solely responsible for providing the environment that enables them to exist. Perhaps the best way to articulate this is by highlighting what MTB trails look like outside of forested areas.

- The only trail network of significance in our area that is not within an established forest, are those on the face of Coronet Peak. Which cannot be ridden for 6-8 months of the year due to the free-thaw cycle, require tens of thousands of dollars in maintenance each Spring to bring the trails up to a rideable standard, and can't be ridden in the wet. Without established forests, Queenstown would lose its year-round, all-weather attractiveness as a place to ride mountain bikes. The economic cost of this is likely measured in the tens of millions of dollars (Bike visitor spend is estimated by Benji Patterson to be \$210m or 50% of the ski visitor economy by 2026).

In simple terms - if the financial cost of containment of wilding spread from the 'seed-source' within Ben Lomond and Queenstown Hill Reserves is less than the tangible and intangible benefits maintain the trees, or selected parts of, provide. What is the harm in keeping a few tens of hectares of established conifer forest amongst tens of thousands of hectares of sub-alpine tussock-land and regenerating bush within the Wakatipu?

Yours sincerely,

Fergus

28	Guy Hingston	Bowen Peak Limited	Yes	Support	Attached as pdf.	<p>Noted support for retail, hospitality tourism offerings, convention centre, 500 carparking building and gondola terminal in One Mile Recreation Reserve. Noted support for two electric funicular railways through the reserve to suburban area and Te-Taumata-o-Haketikura Ben Lomond Saddle. Noted support for predator-free fencing within One Mile Recreation Reserve.</p> <p>Noted support for upper station of the Saddle Funicular including engine room, bar/restaurant, retail, guest services for ski lifts, two 30-bed bunk rooms for outdoor education groups, public shelter, public toilets, a 4WD ambulance base and a 4WD emergency access road.</p> <p>Noted support for wilding pine removal and native planting within the One Mile Recreation Reserve. Noted support for fibreglass boardwalk (walking trail) from the Powerhouse up to Midway Clearing along the One Mile Creek stream.</p> <p>Noted support for extension of the Wynyard DH downhill mountain bike track underneath the planned rising funicular railway tracks down to the start of both funicular railways.</p> <p>Consider wording amendments to several sections.</p> <p>High density housing (250 alpine chalets and 20 transitional alpine chalets not applicable (within private property not within reserve). Bowen Peak seasonal snow/mountain bike park serviced by a six-seater chairlift. not applicable (within private property not within reserve)</p> <p>Noted support improved trail maintenance.</p>
29	Hanna Lynch		No	Neutral	<p>As a new trail user I would love to see the existing network of trails loved and cared for over the development of new trails. There is a big disconnect between skyline trails and Wynyard and having consistent maintenance would be incredible. If you can't maintain the existing trails don't build new ones.</p> <p>There is nothing on development of patrol, emergency access to the trails, signage or mapping for emergency access. Considering it's their longer term plan this needs to be mentioned moving forward. Knowing that I know emergency services can quickly reach me in an emergency would be a priority regardless of where I am on Queenstown trails.</p>	<p>Noted support for improved emergency services and access, signage and wayfinding.</p>
30	Hannah Fox	None	No	Support	<p>I strongly support Queenstown hill walkway remaining a walking ONLY track.</p> <p>I love mountain biking and feel there is more than enough MTB trails. Queenstown hill walk is unique as it sheltered, quiet, easy walking access from town and a very good gradient for physical fitness.</p> <p>Recently groups of mountain bikers have started to ride up the main trail and ride the illegal tracks which directly cross the walking track.</p> <p>I have seen one occasion where a group of 6 went flying across the path closely missing an elderly man and another similar incident where another group nearly hit a mother and two children. The screech of bike brakes could be heard for the whole duration of my walk.</p> <p>I walk this track twice a week and numerous friends and patients do as well. It is a very important track for our communities mental and physical wellbeing. I feel this is greatly threatened by allowing mountain bikers access to the same area.</p> <p>We definitely need better signage saying No Biking.</p> <p>I also support maintaining some view points and would love to see some native replanting. I feel the shelter from the sun and noise is also very important so any longterm plans to remove wilding pine would need to focus around gradual reforestation. I am strongly opposed to just clear felling the forest.</p>	<p>Noted support for the Timewalk remaining a walking only trail.</p> <p>Noted support for phased wilding pine removal.</p>
31	Hannah White	N/A	No	Neutral	<p>We live at [Redacted] Cameron Place, Fernhill directly beside the Ben Lomond reserve and have lived here for over 10 years and now have 2 young children. Our property is less than 20m away in some points from the forest boundary and there are permanent signs up about the fire risk and how a total fire ban is in plan literally next to our property boundary.</p> <p>I read the management plan interested to find out about any wilding pine control that would take place particularly as it is a known red zone risk however was disappointed not to read anything about any control.</p> <p>In the management plan it is acknowledged that wildfire presents a significant risk particularly with higher temperatures and climate changes however while acknowledged, no solution is put forward. I appreciate removing all the wilding pines is a massive job and will likely never happen however creating a bigger firebreak between the forest and our property (and neighbouring Fernhill properties) should be achievable. In particular I'm talking about the trees nearby the properties on Cameron Place up to Wynyard Crescent – not a big area on the scale of things however these would be the properties most affected/at risk by a fire event in the Ben Lomond Forest as we are next to it and not below it. Even taking the trees back 20m or so would offer some reassurance of any fire risk. The vegetation and paths in the area are often overgrown and would only further any fire spread should an event occur.</p> <p>More and more people are frequenting the nearby Wynyard bike park and walking to town, and it's even been in the media that people live in the forest close to our house due to the cost of living crisis. Therefore the risk of something happening is getting more and more likely (scarily).</p> <p>I have raised my concerns with various agencies over the years (QLDC, DOC, NZ Fire and Emergency and ORC) however no one agency seems to take responsibility for it and has listened to my concerns. I would hate for something to happen and it be one of those 'in hindsight' situations, especially for something that has long been known to be a known high risk danger. Wilding control has been done in the region in certain non-residential areas but damage to people's properties and even (god forbid) lives needs to be taken far more seriously.</p> <p>If you could consider this submission that would be much appreciated.</p>	<p>Noted support for vegetation removal.</p> <p>Comments regarding operational wild fire control not applicable (relevant to QLDC Activity Controls to Manage Wildfire Risk within Reserves Policy).</p>
32	Harry Excell		No	Neutral	<p>Trail Expansion and Development: I am in support of QMTBC and QLDC expanding the trail networks in the Ben Lomond Reserve and the development of the Queenstown Hill Reserve to accommodate the growing demand for mountain biking. Including creating new progressive trails, improving connections between riding areas, and formalizing unofficial trails.</p> <p>Upgrading Existing Facilities: I am in support of enhancing existing bike facilities, such as installing water fountains, toilets, and bike washdown areas at Wynyard Jump Park, and formalizing the trail network in Queenstown Hill, including plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track.</p> <p>Collaboration with QLDC: I support the importance of QMTBC aligning their Trail Master Plan with the QLDC Trail Masterplan to ensure coordinated trail development and improved access, including proposals for new uphill trails and trail links from key entrance points like Lakeview and Lomond Crescent.</p> <p>Safety and Trail Management: I support the proposal for safety improvements, such as separating rider and walker traffic on shared trails with bridges/overpasses and advocating for more accessible trail areas like a Skybridge over One Mile Creek to enhance safety and flow.</p> <p>Environmental Integration: I support plans to integrate trail development with environmental restoration efforts, including QMTBC and QLDC collaborating on tree felling and replanting in Queenstown Hill Reserve and the need for effective planning of future biking trails in areas where pine trees are being removed.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expanded mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for trail master plan.</p> <p>Noted support for improved safety, wayfinding and signage.</p>

33	Harry Steer	N/a		Support	See attached pdf submission.	Noted support for mountain biking.  Noted support for expand mountain biking trail network in both reserves.  Consider amendment to 8.2 to remove reference to "Unauthorised".  Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill. Noted opposition to removal wilding trees.
34	Hayden Lockhart	N/a	N/a	Support	See attached pdf submission.	
35	Holly Townsend		No	Oppose	<p>Kia ora,</p> <p>I am generally supportive of the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access to the Reserves. However, I have concerns regarding specific aspects of the Draft Plan that require further consideration.</p> <p>Please see details below:</p> <p>Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve "Unauthorised mountain biking tracks have also been developed with the..." The term "unauthorised" is not appropriate in this context. The wording should be reconsidered to ensure clarity. The Draft Plan downplays the existence and importance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. These trails have been in place for over 20 years and are well-established. Queenstown Hill Reserve is one of only three all-year, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). The natural features and proximity to Queenstown make this MTB area internationally significant. The Draft Plan should be updated to accurately reflect the current use of the Reserve by mountain bikers. While acknowledging that these trails are 'unsanctioned' or 'unofficial,' the plan should prioritise collaboration with the MTB community to formalise and manage them appropriately. Some of our most well-known and highly used trails were once "unofficial" and, with proper planning and management, a new fleet of world-class tracks could draw in more visitors and keep locals engaged and outdoors enjoying our incredible reserves. New objectives and policies specific to MTB trails on Queenstown Hill should be incorporated into Section 13.2. Such revisions would align the Draft Plan with the existing (2005) Reserve Management Plan, which provided for mountain biking with restrictions near the Time Walk track and a requirement that MTB use be limited to formed and approved trails. Additionally, this approach would be consistent with the Reserve's classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.</p> <p>Section 13.1.4 – Ben Lomond Bike Trails It does not appear that appropriate consideration has been given to the impact of vegetation removal on the trail network. This wording suggests that the removal of exotic species in Ben Lomond is inevitable. While community engagement has guided the Draft Plan, the broader community may not fully support this assumption. The backlash following the damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve demonstrates strong community sentiment regarding tree removal. Furthermore, the assumption that bike trails can be maintained post-deforestation is flawed. The flow and condition of trails are linked to the established tree cover, which stabilises steep terrain and maintains suitable soil conditions for trail sustainability. The Draft Plan should acknowledge these challenges, and allow for a more individualised approach to managing vegetation near trails.</p> <p>Section 14.3.1 – Landscape Protection Forestry Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir. This section lacks the qualifying statements found in Section 14.3.2, which outline a staged approach followed by revegetation efforts. Why does the Queenstown Hill Forestry Plan require immediate action without a similarly balanced approach? The plan must consider potential negative consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, staged approach that integrates revegetation efforts is necessary to avoid unintended ecological and landscape degradation.</p> <p>Section 14.6.9 – Biking &amp; Walking Tracks Remove and rehabilitate unauthorised tracks and trails. The Draft Plan fails to acknowledge that many of Queenstown's best and most frequently used MTB trails began as 'unauthorised' trails. Instead of blanket removal, an amnesty should be considered to incorporate well-established tracks into the official network where appropriate. A collaborative approach with the MTB community would result in higher acceptance of formalising some trails while decommissioning others. An overly rigid stance risks alienating a key user group, undermining compliance efforts and affecting Queenstown's status as a leading MTB destination with a progressive approach to welcoming mountain biking.</p> <p>General Comments The Draft Plan leans heavily toward wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced discussion is required to assess the financial, environmental, and societal costs of removal against alternative management strategies. Key considerations missing from the Draft Plan include: Slope Stability &amp; Natural Hazard Mitigation: The steep, geologically unstable terrain benefits from tree cover, which stabilises the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions of dollars, which may be unaffordable for the community. Historical and Aesthetic Value: Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown's identity. Economic Considerations: The Draft Plan acknowledges the economic benefits of mountain biking but does not address the financial impact of removing MTB trails or forested areas. Research estimates MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism. Trail Sustainability &amp; User Experience: Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown's attractiveness as a year-round MTB destination. Carbon Sequestration: These forests capture tens of thousands of tonnes of carbon annually. Removal would result in significant carbon emissions, taking decades to offset even with replanting efforts.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p>

					<p>to onset even with replanting efforts.</p> <p>Regulatory Flexibility: The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than requiring full eradication. A managed retention strategy could be considered instead of wholesale removal.</p> <p>Conclusion</p> <p>As a resident and frequent user of both reserves, I urge the Draft Plan to adopt a more balanced approach. Queenstown's world-class mountain biking network has flourished within these established forests because they provide an environment conducive to sustainable trails.</p> <p>Comparing deforested MTB trails to forested ones highlights this point. The Coronet Peak trails, which exist outside of a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If the forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses and a huge change in lifestyle for the residents who have moved here due to the quality and accessibility of mountain biking.</p>	
36	Jake Byrne	N/a	N/a	Support	See attached pdf submission.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p> <p>Noted support for mountain biking.</p>
37	Jake Luckin		n/a		<p>Hi,</p> <p>Please see my submission below regarding this plan submission.</p> <p>Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission.</p> <p>Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort that has gone into developing the draft plan and acknowledge the community engagement undertaken to date. I am generally supportive of the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access to the Reserves. However, I have significant concerns regarding specific aspects of the Draft Plan that require further consideration to better align with community interests and ensure improved outcomes for both residents and visitors. Below, I provide detailed commentary on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is taken directly from the Draft Plan.</p> <p>Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve</p> <p>Unauthorised mountain biking tracks have also been developed with the....</p> <p>The term "unauthorised" carries a specific legal connotation under the Reserves Act 1977 that does not fully align with its use in this context. The wording should be reconsidered to ensure clarity.</p> <p>Additionally, the Draft Plan appears to downplay the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. These trails, as evidenced by Strava heat maps, have been in place for over 20 years and are well-established.</p> <p>Queenstown Hill Reserve is one of only three all-year, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). The natural features and proximity to the town center make this MTB area internationally significant.</p> <p>The Draft Plan should be updated to accurately reflect the current use of the Reserve by mountain bikers. While acknowledging that these trails are 'unsanctioned' or 'unofficial,' the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be incorporated into Section 13.2. Ignoring this well-established trail network due to resource constraints is not an acceptable long-term strategy.</p> <p>Such revisions would align the Draft Plan with the existing (2005) Reserve Management Plan, which provided for mountain biking with restrictions near the Time Walk track and a requirement that MTB use be limited to formed and approved trails. Additionally, this approach would be consistent with the Reserve's classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.</p> <p>Section 13.1.4 – Ben Lomond Bike Trails</p> <p>Consideration will have to be given to the bike trail network when the vegetation removal occurs.</p> <p>This wording suggests that the removal of exotic species in Ben Lomond is inevitable. While community engagement has guided the Draft Plan, the broader community may not fully support this assumption. The backlash following the damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve demonstrates strong community sentiment regarding tree removal.</p> <p>Furthermore, the assumption that bike trails can be maintained post-deforestation is flawed. The presence of trails is intrinsically linked to the established tree cover, which stabilizes steep terrain and maintains suitable soil conditions for trail sustainability. The Draft Plan should acknowledge these challenges.</p> <p>Section 14.3.1 – Landscape Protection Forestry</p> <p>Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.</p> <p>This section lacks the qualifying statements found in Section 14.3.2, which outline a staged approach followed by revegetation efforts. Why does the Queenstown Hill Forestry Plan require immediate action without a similarly balanced approach?</p> <p>The plan must consider potential negative consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, staged approach that integrates revegetation efforts is necessary to avoid unintended ecological and landscape degradation.</p> <p>Section 14.6.9 – Biking &amp; Walking Tracks</p> <p>Remove and rehabilitate unauthorised tracks and trails.</p> <p>The Draft Plan fails to acknowledge that many of Queenstown's best and most frequently used MTB trails began as 'unauthorised' trails. Instead of blanket removal, an amnesty should be considered to incorporate well-established tracks into the official network where appropriate. A collaborative approach with the MTB community would result in higher acceptance of formalizing some trails while decommissioning others. An overly rigid stance risks alienating a key user group and undermining compliance efforts.</p>	<p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>

				<p><b>General Comments</b></p> <p>The Draft Plan leans heavily toward wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced discussion is required to assess the financial and environmental costs of removal against alternative management strategies.</p> <p>Key considerations missing from the Draft Plan include:</p> <ul style="list-style-type: none"> <li>•Slope Stability &amp; Natural Hazard Mitigation:The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions of dollars, which may be unaffordable for the community.</li> <li>•Historical and Aesthetic Value: Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown's identity.</li> <li>•Economic Considerations: The Draft Plan acknowledges the economic benefits of mountain biking but does not address the financial impact of removing MTB trails or forested areas. Research estimates MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism.</li> <li>•Trail Sustainability &amp; User Experience:Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown's attractiveness as a year-round MTB destination.</li> <li>•Carbon Sequestration: These forests capture tens of thousands of tonnes of carbon annually. Removal would result in significant carbon emissions, taking decades to offset even with replanting efforts.</li> <li>•Regulatory Flexibility: The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than requiring full eradication. A managed retention strategy could be considered instead of wholesale removal.</li> </ul> <p>Conclusion</p> <p>As a long-term resident and frequent user of both reserves, I urge the Draft Plan to adopt a more balanced approach. Queenstown's world-class mountain biking network has flourished within these established forests because they provide an environment conducive to sustainable trails. Comparing deforested MTB trails to forested ones highlights this point. The Coronet Peak trails, which exist outside of a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.</p> <p>If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, then maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.</p> <p>Regards Jake</p>		
38	James Imlach	New Zealand Motor Caravan Association Inc.	No	Oppose	<p>The NZMCA represents the interests of over 120,000 individual New Zealanders the vast majority of whom enjoy freedom camping responsibly in their certified self-contained motorhomes and caravans. Many NZMCA members residing in the Queenstown-Lakes District enjoy freedom camping locally. The NZMCA is also a local ratepayer owning and operating a private motorhome park / campground in Glenorchy.</p> <p>We oppose clause 14.5.23 insofar as it seeks to prohibit vehicle-based freedom camping and limit the Council's ability to allow freedom camping (with or without restrictions) on the reserves through its new freedom camping bylaw review process.</p> <p>We have had discussions with QLDC's Policy &amp; Communications Managers about the Council's proposed new freedom camping bylaw. In light of those discussions, it is important QLDC recognises the interrelationship between the Freedom Camping Act 2011 and Reserves Act 1977 through its RMP decision-making.</p> <p>The Council, through its bylaw review, may want to consider enabling freedom camping in a local authority area governed by this RMP. However, that will be very difficult to achieve if the RMP is adopted with clause 14.5.23 in place.</p> <p>We recommend either:</p> <p>(a) Amending clause 14.5.23 to read "The Council may, at its discretion, permit or restrict freedom camping in designated areas and determine the restrictions that apply"; or</p> <p>(b) Deleting clause 14.5.23 (the default provisions under section 44(1) of the Reserves Act will still apply).</p> <p>Option (a) gives QLDC full discretion to allow (or not) freedom camping in designated areas within the reserve(s) if/when it reviews its freedom camping bylaw.</p> <p>Option (b) gives similar discretion to QLDC, although if the bylaw seeks to allow freedom camping on site the Council will also have to exercise its delegated authority under the Reserves Act to allow the activity under that statute. This administrative burden can be avoided by adopting Option A above.</p> <p>Our submission is about giving QLDC more flexibility when making decisions that relate to enabling freedom camping under the Freedom Camping Act and Reserves Act.</p>	<p>Noted support for freedom camping.</p> <p>Consider updating 14.35.23 to enable freedom camping in the reserves, or, consider removing to 14.5.23 which prevents camping in the reserves.</p>
39	James Mulcahy		No	Support	<p><b>Trail Expansion and Development:</b> I support QMTBC and QLDC in extending the trail network within Ben Lomond Reserve and developing Queenstown Hill Reserve to meet the rising demand for mountain biking and further build on its economic benefits. This includes building new progressive trails, improving connectivity between riding areas, and formalising existing unofficial trails.</p> <p><b>Upgrading Existing Facilities:</b> I back improvements to current bike facilities, such as adding water fountains, toilets, and waste/bike wash stations at Wynyard Jump Park. I also support formalising the Queenstown Hill trail network, including plans for dual slalom and jump lines, as well as paving the Kerry Drive pump track.</p> <p><b>Collaboration with QLDC:</b> Aligning QMTBC's Trail Master Plan with QLDC's strategy is key to ensuring a well-coordinated approach to trail development. I support proposals for better access, including new uphill trails and improved connections from key access points like Lakeview and Lomond Crescent.</p> <p><b>Safety and Trail Management:</b> I endorse measures to enhance safety, such as separating riders and walkers on shared trails using bridges or overpasses. Additionally, creating more accessible trail features, like a Skybridge over One Mile Creek, would improve both safety and trail flow.</p> <p><b>Environmental Integration:</b> I support integrating trail development with environmental restoration efforts. Collaboration between QMTBC and QLDC on tree felling and replanting in Queenstown Hill Reserve is essential, alongside careful planning for future trails in areas affected by pine removal.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for comprehensive trails master plan.</p> <p>Noted support for improvements to Fernhill Loop track.</p> <p>Noted support for wilding pine removal.</p> <p>Noted support for improved safety in the reserves.</p>

40	James Rhodes	N/A	No	Neutral	<p>While I generally support the objectives and policies of the Draft Plan, particularly in regard to enhancing recreational facilities and access, I have concerns about certain aspects of deforestation and trail management that require further consideration to better align with community needs and improve outcomes. These concerns and recommendations are outlined below.</p> <p>Section 8.2 – Te Tapunui Queenstown Hill Reserve: Primary Users and Activities</p> <ul style="list-style-type: none"> <li>•The term “unauthorised” mountain biking trails may mislead, given its legal context under the Reserves Act 1977.</li> <li>•The Draft Plan underrepresents the significance of the MTB network on Queenstown Hill Reserve, which is internationally known and well-established.</li> <li>•Recommendation: Acknowledge the long-standing MTB network and work collaboratively with the MTB community to formalize these trails where appropriate.</li> </ul> <p>Objective: Update Section 13.2 to include specific policies for MTB trails, ensuring alignment with the 2005 Reserve Management Plan and Reserves Act.</p> <p>Section 13.1.4 – Ben Lomond Bike Trails</p> <ul style="list-style-type: none"> <li>•The Draft Plan suggests exotic species removal in Ben Lomond as inevitable, but this doesn’t reflect wider community opinion.</li> <li>•Trees are crucial for supporting the bike trails—removal would harm the network.</li> <li>•Recommendation: Reassess the removal of trees to ensure it doesn’t negatively impact the biking network.</li> </ul> <p>Section 14.3.1 – Landscape Protection Forestry</p> <ul style="list-style-type: none"> <li>•The Draft Plan prioritizes wilding removal on Queenstown Hill without a staged, balanced approach like the one proposed for Ben Lomond.</li> <li>•Wilding species removal may lead to the spread of other invasive species if not properly managed.</li> <li>•Recommendation: Adopt a more balanced, staged approach with revegetation, similar to the one for Ben Lomond, and avoid prioritizing wilding removal over other concerns.</li> </ul> <p>Section 14.6.9 – Biking &amp; Walking Tracks</p> <ul style="list-style-type: none"> <li>•Many of the most popular MTB trails on Queenstown Hill started as unauthorised. They should be considered for formalisation.</li> <li>•Recommendation: Allow a process to integrate established “pirate” trails into the official network, fostering a positive relationship between the QLDC and MTB community.</li> </ul> <p>General Comments</p> <ul style="list-style-type: none"> <li>•The Draft Plan emphasizes removing wilding conifers, but overlooks their valuable contributions to the community and environment.</li> <li>•Wilding conifers help stabilize the landscape, protect against rockfall, and enhance recreation.</li> <li>•Recommendation: Weigh the financial and environmental costs of tree removal against their benefits, particularly considering: <ul style="list-style-type: none"> <li>oProtection: Trees help reduce trail damage caused by freeze-thaw cycles.</li> <li>oCost: Removing trees could require expensive rockfall protection infrastructure.</li> <li>oCarbon Sequestration: Mature trees sequester significant amounts of carbon, which would be lost with removal.</li> <li>oRecreation: Established trees improve trail conditions by reducing erosion, providing shade, and stabilizing soil moisture.</li> </ul> </li> </ul> <p>Economic Considerations</p> <ul style="list-style-type: none"> <li>•The economic impact of mountain biking is substantial—visitor spend is projected at \$210 million by 2026.</li> <li>•Recommendation: Consider the potential negative economic impact of removing trees and trails.</li> <li>•Benefit: Maintaining the trees and bike trails supports year-round tourism and recreation in Queenstown.</li> </ul> <p>Conclusion</p> <ul style="list-style-type: none"> <li>•As a frequent reserve user, I believe the Draft Plan should adopt a more balanced approach that recognizes the value of both the trees and mountain biking network.</li> <li>•Trails in forested areas are vital to Queenstown’s year-round appeal for mountain biking, and the economic costs of removing trees may outweigh the benefits of wilding control.</li> <li>•Final Recommendation: Keep selected areas of forest, consider long-term benefits over immediate removal, and work collaboratively with the MTB community to ensure a sustainable and enjoyable future for the reserves.</li> </ul>	<p>Noted support for mountain biking.</p> <p>Noted support for expanded mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to “Unauthorised”.</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted support for stage approach to wilding pine removal.</p>
41	James Sutherland	Heritage New Zealand	No		See attached pdf submission.	<p>Noted support for protection and management of heritage values and archaeological sites in the reserves.</p> <p>Noted support for implementation and maintenance of interpretation panels within the reserves.</p> <p>Consider amendment to section 9.0 to refer Heritage New Zealand Pouhere Taonga process and contact information.</p> <p>Consider and an archaeological management plan.</p>
42	Jamie Seymour	Smokefree Otago	Yes	Support	<p>Smokefree Otakau, a group of organisations that share an interest in advocating for and promoting Smokefree and Vapefree environments wish to thank the Council for the opportunity to submit on the Draft Te-Taumata-o-Hakitekura Ben Lomond &amp; Te Tapunui Queenstown Hill Reserve Management Plan (the Plan).</p> <p>Overall we strongly support the Plan’s commitment to enhancing public health and creating an accessible space for all. We encourage QLDC to recognise New Zealand’s commitment under the Framework Convention on Tobacco Control (FCTC) (1) by implementing smokefree and vapefree policies in these reserves.</p> <p>Although Queenstown Lakes District Council’s Smokefree Policy is almost 20 years old (established in 2006), we strongly advocate for improved and stronger smokefree/vapefree areas and signage to denormalise smoking in the public environment, thus minimising the exposure that children and young people have to smoking and vaping. Prohibiting smoking and vaping in outdoor areas is an important step in ongoing efforts to create environments that support smokers/vapers to quit, discourage non-smokers/vapers from starting, denormalise smoking/vaping to children and youth, and reduce exposure of second-hand smoke (SHS) to vulnerable people (2).</p> <p>Local councils play a vital role in denormalising smoking and vaping creating Smokefree Outdoor Spaces policies that include both smoking and vaping. We note strong public support for Smokefree Outdoor spaces, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Positive modelling for young people</li> <li>• Litter control</li> <li>• Reducing accidental fire risks</li> <li>• Reducing involuntary exposure to second-hand smoke (particularly in areas where tamariki are present or people congregate)</li> <li>• Making spaces more whanau friendly</li> </ul> <p>As per the Local Government (Community Well-being) Amendment Act 2019 (3), council’s role includes promoting the social, economic, environmental and cultural well-being of communities, in the present and for the future. Smokefree and vapefree policies play a key role in reducing inequities in smoking-related health outcomes. As Maori adults have a significantly higher smoking rate than non-Maori (4) adopting a smokefree/vapefree approach in these reserves aligns with the Pae Ora (Healthy Futures) Act 2022 (5) goals to eliminate health inequities, offering a healthier, more supportive environment that fosters positive health choices for all.</p> <p>Our experience suggests that clear policy and succinct signage will help with compliance and will not require enforcement. At 9.6% (6), the prevalence of smoking in our community is low enough that peer pressure will be sufficient to ensure compliance.</p>	<p>Noted support for both reserves being smokefree.</p>

Cigarettes are the most littered item in New Zealand, with an estimated 4.5 trillion littered every year worldwide (7). Cigarette filters are not bio-degradable and harmful when consumed by pets, wildlife and children (7,8). The cost of cleaning up cigarette butts imposes a considerable financial burden on Councils at a time when budget setting is challenging.

Queenstown is known for its beautiful landscapes, Ben Lomond and Queenstown Hill being two of the most prominent. We have outstanding outdoor recreation opportunities with incredible fauna and home to special wildlife. Sadly smoking threatens these taonga, particularly litter and detritus associated with smoking. Cigarette butts, and now vape cartridges and litter, are being found everywhere in Otago, from beach to bush.

Vaping devices when improperly discarded can leach toxic chemicals, heavy metals, flammable ion batteries, and microplastics into our natural environments (9). In addition, the risk of battery failure/explosion or other vape-related injuries (10), is on the rise in New Zealand (11) and in many other countries. Additionally, vaping devices are often disposed into rubbish bins where the batteries pose a dangerous risk for fires in public waste/recycling areas or on rubbish trucks (12).

Thank you for the opportunity to submit on the Draft Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui Queenstown Hill Reserve Management Plan.

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43 Jarrah Healy	N/a	n/a	Support	See attached pdf submission.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p> <p>Noted support for mountain biking.</p>
44 Jason McDonald		No	Support	<p>I fully support QMTBC and QLDC in their efforts to expand the trail networks in the Ben Lomond Reserve and develop the Queenstown Hill Reserve to meet the increasing demand for mountain biking. Expanding these trails will create more opportunities for riders of all levels and capabilities, including adaptive mountain biking, strengthen the outdoor community, and enhance Queenstown's reputation as a globally recognised premier biking destination. This includes creating new progressive trails to accommodate different skill levels, improving connections between existing riding areas for better accessibility and flow, and formalising unofficial trails to ensure their sustainability for the future.</p> <p>Upgrading and enhancing existing bike facilities is an essential step in improving the overall riding experience. I strongly support the installation of water fountains, toilets, and bike wash stations at Wynyard Jump Park, as well as the formalisation of the trail network in Queenstown Hill. The development of dedicated features, such as dual slalom and jump lines, along with asphaltting the Kerry Drive pump track, will further improve the quality of riding available and make the trails more inclusive for a broader range of users.</p> <p>Collaboration between QMTBC and QLDC is critical to ensuring a well-planned and cohesive trail network. Aligning the QMTBC Trail Master Plan with the QLDC Trail Masterplan will improve access and connectivity, particularly with the development of new uphill trails and strategic trail links from key entrance points like Lakeview and Lomond Crescent. A unified approach to trail planning will benefit riders and ensure long-term sustainability.</p> <p>Safety is a crucial factor in trail development, and I fully support improvements that prioritise both riders and pedestrians. Separating rider and walker traffic on shared trails through bridges and overpasses is an important step in reducing conflicts and enhancing safety. More accessible trail areas, such as a Skybridge over One Mile Creek, will improve both safety and the overall flow of the trails, making them more enjoyable for all users.</p> <p>I also strongly support the integration of trail development with environmental restoration efforts. Thoughtful planning is essential to balance the expansion of biking trails with conservation efforts, including collaborative initiatives between QMTBC and QLDC for tree felling and replanting in the Queenstown Hill Reserve. Ensuring that future trails are carefully planned in areas where pine trees are being removed will allow for responsible development while preserving the natural landscape.</p> <p>By investing in strategic trail development, improving facilities, prioritising safety, and integrating environmental stewardship, Queenstown can continue to offer an outstanding mountain biking experience while maintaining the integrity of its natural surroundings. I fully support these initiatives and look forward to seeing the ongoing evolution of Queenstown's trail network.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p>

45 Jen Andrews	No	Support	<p>Submission Regarding Malaghan St Reserve</p> <p>On behalf of the Malaghan St residents, we would like to make the following submission regarding the Malaghan St Reserve as a subset of the Queenstown Hill reserve plan:</p> <p>1. Change the Malaghan St Reserve Status &amp; Instigate Regular Maintenance  Malaghan St Reserve is a well-known, high-traffic pedestrian 'gateway' to the Queenstown Hill Walking Track and Queenstown Hill residences, frequented by locals and visitors. The access route is signposted from the CBD and is the preferred walking route on Google Maps, drawing significant numbers of visitors every day, especially during the summer. Many people also use the reserve at night as a shortcut to walk to/from the CBD, even though there is no lighting.</p> <p>Given its visibility, importance, and high usage, we respectfully ask QLDC to formally reclassify the whole Malaghan St Reserve and return it to its former status (refer to the Background section below). This would ensure it receives the regular maintenance and care it deserves as an important community access space and a great visitor experience connecting people with Queenstown Hill. We also suggest considering low-level lighting (maybe small solar lights?) for safer use at night.</p> <p>2. Mitigate Fire Hazard – Remove Overgrown Noxious Weeds  The reserve area behind houses 22A-D and 23 at the top of Malaghan St used to be sprayed annually to control noxious weeds. Unfortunately, this has not been done in several years, and weeds like broom, lupin, buddleia, little pines, blackberry, and holly have taken over. The unchecked growth of these weeds has created a dense and hazardous environment, and we have become very concerned about the potential fire risk, especially with the number of visitors using the reserve and the houses that back directly onto it. If a fire were to start, it would spread quickly, becoming an immediate threat to property and life.</p> <p>We understand that QLDC is working on a noxious weed control plan (reference number PP22/0007), and we'd greatly appreciate it if this issue could be addressed promptly. As part of the reserve's maintenance, we would like to see the overgrown noxious weeds removed and controlled, with annual spraying to prevent them from spreading further. The neighbouring properties would also help look after the space.</p> <p>3. Community Involvement in Restoring the Reserve  We would love QLDC to consider a community planting day, where local residents, Queenstown Hill users, and visitors could come together to help restore Malaghan St Reserve to its former beauty. This initiative would not only improve the reserve but foster a sense of community spirit.</p> <p>4. Improve Wayfinding for Visitors  With the new town arterial route now in use, we suggest QLDC takes the opportunity to review and update its wayfinding (signage, maps and Google Maps) to make it easier for pedestrians and vehicles to navigate between Queenstown Hill and the CBD.</p> <p>Currently, Malaghan St is the designated walking route for the Queenstown Hill track (via signage and Google Maps), and Edgar St/Kerry Drive is the main driving route. However, there is very little clear signage for pedestrians and no signage at all for drivers (in fact, many try to drive up Malaghan St only to find it's a steep no-exit street with a tricky tight-turning space and no parking). About once a month on average we need to assist an international visitor whose vehicle has got stuck on the steep corner at the top of Malaghan St. They always say they thought Malaghan St was how they accessed Queenstown Hill Walking Track and its parking area.</p> <p>Additionally, it would be useful to mark nearby public toilet facilities clearly – we understand there are some on Kerry Drive near the Queenstown Hill Walking Track but people don't know they exist.</p> <p>Background - Malaghan St Reserve Maintenance  Malaghan St Reserve was once beautifully planted with tussocks, flaxes, and nikau/cabbage trees and was well-maintained until about 2021. In early 2022, Malaghan St residents reached out to QLDC to understand why the maintenance had stopped. We learned that the reserve had been re-designated as a "natural reserve," a decision that was neither communicated to nor supported by the local community. This reclassification meant that only the strip on each side of the stairs was designated as a "garden area" to be maintained, while the rest of the reserve became unscheduled. The result is that the entire reserve now looks unkempt and unwelcoming, which is concerning given its high visibility and usage.</p> <p>In November 2023, QLDC confirmed that the reserve had been added back to the regular maintenance schedule after being "inadvertently overlooked." While the contractor did a great one-off job clearing and spraying in December 2023, the area hasn't been maintained and has become overgrown again. After several years of attempting to resolve this, we would really appreciate some clarity around the maintenance schedule - is it twice a year, quarterly, or something else?</p> <p>Conclusion  Apart from reclassifying the reserve status, we believe most of these issues are operational and could be addressed relatively easily.</p> <p>For further context, email correspondence with QLDC over the past few years has been shared with Briana and Sofie at the Village Green drop-in session. If needed, we're happy to resend these emails and photos of the reserve to support this submission.</p> <p>Thank you for considering our submission. We look forward to your response.</p>	<p>Support for improved maintenance of Malaghans Street Reserve relates to operational Council function.</p> <p>Noted support for improved wayfinding and signage for public toilets.</p>
46 Jenni Dimmock	No	Support	<p>Expanding and Developing Trails: I support QMTBC and QLDC in expanding the Ben Lomond Reserve trails and developing the Queenstown Hill Reserve to meet the increasing demand for mountain biking. This includes building new progressive trails, improving connections between riding areas, and formalizing existing unofficial trails.</p> <p>Upgrading Facilities: I'm in favor of upgrading bike facilities, such as adding water fountains, toilets, and bike wash areas at Wynyard Jump Park. I also support formalizing the Queenstown Hill trail network, including plans for dual slalom/jump lines and paving the Kerry Drive pump track.</p> <p>Working with QLDC: I think it's important for QMTBC to align their Trail Master Plan with QLDC's to ensure better coordination and access. This includes proposals for new uphill trails and better links from key entry points like Lakeview and Lomond Crescent.</p> <p>Safety and Trail Management: I support making trails safer by separating riders and walkers with bridges or overpasses. I also think accessible features like a Skybridge over One Mile Creek would improve both safety and trail flow.</p> <p>Environmental Considerations: I back efforts to integrate trail development with environmental restoration. This includes QMTBC and QLDC working together on tree felling and replanting in Queenstown Hill Reserve and ensuring future trails are planned carefully in areas where pines are being removed.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p>

47	Jo Knight	Sport Central/Sport Otago/Sport New Zealand	No	Support	<p>Sport Central (regional branch of Sport Otago, and on behalf of Sport New Zealand) is pleased to submit our support for the Ben Lomond and Queenstown Hill draft Reserve Management Plan. Our vision is to foster a community where everyone can participate in and enjoy sport and recreation, promoting health, well-being, and social cohesion. Every Whanau, active every day.</p> <p>The accessible trails close to central Queenstown are a vital asset for our community, providing opportunities for people of all ages and abilities to engage in outdoor activities. These trails are not only a gateway to physical fitness but also a connection to the rich history of the area. The historical significance of these trails, which have been used for generations, adds to their value and importance. Just last week I heard a friend say her three year old had been building up to, and was excited to be finally walking the Tiki Trail. Equally important are the long-term residents who regularly use these trails.</p> <p>We strongly support the proposed upgrades and maintenance of trail entrances, including the installation of clear signage and maps. This will enhance the user experience, making it easier for both locals and visitors to navigate and enjoy the trails.</p> <p>Improved infrastructure, such as the addition of toilets and water fountains, is essential for ensuring that the trails are accessible and comfortable for all users. These amenities will encourage more people to use the trails, promoting a healthier and more active community.</p> <p>We also advocate for the protection, restoration, and enhancement of the natural environment surrounding the trails. It is crucial to preserve the beauty and ecological integrity of these areas while allowing for sustainable recreational use. We support the inclusion of consultation processes for new Active Recreation opportunities, ensuring that any developments are in line with community needs and environmental considerations.</p> <p>The provision of both informal and formal recreation opportunities is important for catering to a diverse range of interests and abilities. A well-managed and maintained trail network, as outlined in the subregional facilities strategy, will ensure that these trails continue to serve the community effectively for years to come.</p> <p>In conclusion, Sport Otago supports the Ben Lomond and Queenstown Hill draft Reserve Management Plan. We believe that the proposed improvements will enhance the accessibility, usability, and sustainability of these valuable community assets.</p> <p>Thank you for considering our submission. Sincerely, Jo Knight Sport Central</p>	<p>Noted support for upgraded reserve entrances.</p> <p>Noted support for ecological enhancement.</p> <p>Noted support for reserve infrastructure to support recreation.</p> <p>Noted support for ensuring reserves are accessible and inclusive</p>
48	Joe Robinson	N/a	n/a	Support	<p>See attached pdf submission.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p> <p>Noted support for improved emergency services and access.</p>
49	John		No	Oppose	<p>Emergency Access, Response, and Signage (Objectives 12.1.5 &amp; 13.1.4)</p> <p>Given the significant year-round foot and bike traffic in the Ben Lomond Reserve, I believe there needs to be greater focus and discussion on emergency access, response strategies, and improved signage.</p> <p>While existing signage advises calling 111 in an emergency, additional improvements would be beneficial, particularly in ensuring visitors can accurately communicate their location. Further signage would also support this stating what users should do encase of injury - e.g. call 111, flag down other bikers to support closing off the track until emergency services are on-scene, find a locator sign to ensure emergency services know where they are. A detailed map outlining the locations of signage and key landmarks would help emergency services navigate the reserve more effectively. Due to the density of pine trees, GPS coordinates can sometimes be inaccurate when emergency services attempt to locate individuals using mobile phones.</p> <p>Clarifying emergency response protocols, particularly for trails not directly accessible by vehicle, would also be beneficial. A mapped outline of all access routes, including trail junctions and emergency entry points, would help responders navigate the reserve effectively. Additionally, better support for local response agencies in understanding the terrain and access routes would shorten response times, allowing emergency personnel to operate more efficiently. Ensuring emergency access points are well-maintained and clearly signposted would further enhance safety and the community's safety when using the Ben Lomond Reserve.</p> <p>Event Licensing Process</p> <p>To support the community in hosting recognised events for both bikers and hikers, it would be useful to have a clear and accessible timeline outlining the process for obtaining event licences. Understanding the necessary steps and estimated approval timeframe for event permits in Ben Lomond Reserve would help organisers plan more effectively.</p> <p>Having clear guidelines on how events are entitled to operate within the reserve, including capacity limits, environmental considerations, and infrastructure requirements, would provide event organisers with the necessary framework to ensure compliance and smooth operations.</p> <p>Trail Grading, Maintenance, and Community Input (Policy 14.6.6)</p> <p>To ensure both tourists and local riders can assess their abilities and ride safely, clear information on trail grading levels is essential. A structured system for grading trails will help riders set realistic expectations based on their skill levels. Additionally, transparency around trail maintenance—who is responsible, how often reviews are conducted, and what the ongoing maintenance plan is—would enhance safety and usability.</p> <p>Trails change significantly throughout the year due to weather conditions and the volume of riders using them. I believe an ongoing review process is necessary to ensure that grading remains accurate, and trails are maintained to a high standard. Would the council be open to community engagement on trail grading updates? Allowing input from experienced local riders could help ensure that trails are categorised appropriately and remain safe for all users.</p> <p>Lastly, ensuring continued maintenance of both new and existing trails is vital for the long-term development of Queenstown's biking network. How can we guarantee sufficient resources and funding for regular trail upkeep to support both the local community and visitors? Having a structured plan for maintenance and development will help sustain Queenstown's reputation as a world-class biking destination.</p>	<p>Noted support for improved emergency services and access.</p> <p>Noted support for more event regulation.</p> <p>Noted support for trail grading system.</p>

50	John Seely		n/a	Support	See attached pdf submission.	Noted support for mountain biking.  Noted support for expand mountain biking trail network in both reserves.  Consider amendment to 8.2 to remove reference to "Unauthorised".  Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill. Noted opposition to removal wilding trees. Noted support for mountain biking.
51	Jon Mann		No	Support	Need to gradually increase and develop mountain biking trails and facilities.	Noted support for mountain biking.
52	Jordan Fritz		No	Support		
53	Julie Margeret Scott	n/a	No	Support	Support with a couple of further suggestions:  14.3.8(b) - add reference to the management of feral cats (this could be noted in objectives as being undertaken in conjunction with existing community groups).  14.5.18. Establish lease and licence agreements with community groups "and individuals" where the activity will:.....	Consider update to 14.3.8(b) to include feral cats  Avoid change to 14.5.18, agreements with groups rather than individuals reduces risk to council.
54	Julien		No	Support		
55	Kate		No	Neutral	Maintaining the amazing trails we have in these areas sounds like a great idea	Noted support for maintaining existing trail network
56	Katy Winton		No	Neutral	I believe Queenstown is already a world-class riding destination, and I am keen to see it protected and developed in a way that keeps it sustainable, safe, and accessible for everyone—while also looking after the environment.  Trail Expansion & Development I fully support QMTBC and QLDC expanding the trail networks in Ben Lomond Reserve and developing the Queenstown Hill Reserve to keep up with the growing demand for mountain biking. That means creating more progressive trails, improving connections between different riding areas, and making sure unofficial trails are properly built and maintained.  Upgrading Existing Facilities I'd love to see better facilities, like water fountains, toilets, and bike wash stations at Wynyard Jump Park. Formalizing the Queenstown Hill trail network would be a huge win too—especially with plans for a dual slalom/jump line and asphaltting the Kerry Drive pump track.  Better Coordination with QLDC For things to work well long-term, I think it's important that QMTBC aligns its Trail Master Plan with QLDC's plan. This will make sure new trails and links—like uphill tracks and connections from spots like Lakeview and Lomond Crescent—are properly thought out and make access easier for everyone.  Safety & Trail Management Safety is key, so I fully support separating walkers and riders on shared trails, whether that's through bridges or overpasses. A Skybridge over One Mile Creek would be a great addition to improve flow and keep things safer for all users.  Looking After the Environment I really support the idea of combining trail development with environmental restoration. That means smart planning for new trails in areas where pine trees are being removed and making sure replanting happens in places like Queenstown Hill Reserve.	Noted support for mountain biking.  Noted support for expanded mountain biking trail network in both reserves.  Noted support for reserve infrastructure to support mountain biking.
57	Kelvin Middleton	Queenstown Hill Station	Yes	Neutral	I understand the communities need and wants however there must also be consideration for the flow on effects to us as neighbouring land owners. ie when people discuss more rock climbing and bike trails. A real need should be specific fencing or knowledge that there is a private owned land in the areas	Noted opposition to unregulated biking trails and rockclimbing on Queenstown Hill.
58	Lisa Murphy	Goldfield Heights Body Corporate	No	Support	Goldfield Heights Body Corporate seek the removal of the trees above Goldleaf Hill to reduce fire risk to the Goldfield Heights Body Corporate	Noted support for wilding pine removal above Goldleaf Hill.
59	Lisa Murphy	Goldfield Heights Body Corporate	No	Support	Goldfield Height Body Corporate seek the removal of the trees above Goldleaf Hill to reduce fire risk to the Goldfield Heights Body Corporate.	Noted support for wilding pine removal above Goldleaf Hill.
60	Maddy Grandiek	ZJV (NZ) Limited, trading as Ziptrek Ecotours.	Yes	Support	See attached pdf submission.	Noted support for recreation opportunities for people of all abilities.  Noted supported for provision of appropriate commercial recreation opportunities in Te-Taumata-o-Hakitekura Ben Lomond.  Noted support for interpretation panels in the reserve.  Consider amendment to include glossary of terms, reference to "Ziptrek Ecotours", to the maps, separate vision statements for each reserve, amend section 7.4, section 7.5, section 7.6, section 8.1, section 9.3, section 10, section 11.4, add new objective 12, amend objective 12.6, objective 12.15, objective 12.16, objective 13.1.6, objective 13.6.1.2, objective 13.1.7.5, objective 13.3, policy 13.3.1.4., add new policies 14.2.4 and 14.2.5, amend policy 14.3.4, reorder fire policies (14.3.10 to 14.3.12), amend policy 14.3.10, policy 14.3.11, policy 14.3.12, policy 14.3.14, policy 14.3.18, policy 14.5.7, policy 14.5.10, delete policy 14.5.14, amend policy 14.5.16, policy 14.5.23, delete policy 14.6.1, amend policy 14.6.6, delete policy 14.6.14, new policy 14.6.22, amend Appendix 3.
61	Marcus van Egmond		No	Neutral	Trail Network: the trail network should only be expanded by formalizing existing unofficial network. Construction should focus on plans to maintain the existing network, as it is frequently in a state of disrepair.  Patrol/Emergency Access: there is a great need for improvement on emergency access, with the amount of life threatening injuries witnessed this year.	Noted support for formalising pirate mountain biking trails.  Noted support for improved emergency services and access.
62	Mark Williams	Queenstown Trails Trust	No	Support	It is imperative to foster recreational use of these reserves (specifically MTB trails) in perpetuity, for the benefit of the community, visitors and the conservation outcomes which result from enabling improved access (wilding control, native replanting and predator trapping).	Noted support for mountain biking.  Noted support for conservation efforts in the reserves.

63	Matthew Edwards		No	Support	<p>I am in full support of QMTBC and QLDC expanding &amp; developing the bike trail network in the Ben Lomond reserve as well utilising the Queenstown Hill reserve to further grow the network. I strongly believe this should include formalising unofficial trails. The existing Ben Lomond trail network is proof of how successful this approach can be.</p> <p>I also fully support the integration of trail network development to be included in the planning process of restoring the environment by the felling &amp; replanting of the Queenstown Hill reserve. I think the inclusion of bike trails should be considered in all areas where pine trees are being removed to allow for the replanting of indigenous species.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for wilding pine removal and revegetation.</p>
64	Matthew Packwood	N/a	N/a	Support	See attached pdf submission.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p> <p>Noted support for mountain biking.</p>
65	Matthew Turner	N/a	N/a	Support	See attached pdf submission.	<p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p> <p>Noted support for mountain biking.</p>
66	Meesha powell		No	Oppose	<p>Hi,</p> <p>I do not support the deforestation efforts to remove pest species over Ben lomond and Queenstown hill. I understand the need to contain and manage. Removal significantly detracts from the visual appeal of the town. The forestry makes us different from Cromwell, Alexandra and wanaka. In a time of significant economic downturn this town requires tourism, Queenstown has always been represented with a lush canopy of trees to zip line, bungy, hike and explore through. It helps manage water run off into the town and provides a constant green vista in otherwise a very arid climate. Yes beech trees would also be good, however there growth rate isn't supportive of meaningful carbon absorption or visual appeal as it would be at least a 25 year turn around and they are far more prone to windfall which would cost more to mitigate.</p> <p>Rate payers are already struggling, and if you remove the pressure from a few very opinionated environmentalist the reality is trees are good. Pines are helping in a time of increase pollution and population. Removing them only helps you "feel better" for the natives. A tree is a tree. Financially, you will constantly be having more pop up in an exposed canopy and it'll never end.. so it may make you look better now but full transparency would actually be how much money it will continue to cost over the lifespan of the rate payers and to what end really..</p> <p>So no I do not agree with the desire to remove existing tress that have been in place for over 20 years such to appease a few strong headed "environmentalist" who lack the understanding of longevity vs nativity.</p>	<p>Noted opposition to removal wilding trees.</p> <p>Noted opposition to wilding pine removal.</p>
67	Meghan Lee		No	Neutral	<p>I fully support QMTBC and QLDC in expanding the trail networks in Ben Lomond Reserve and developing Queenstown Hill Reserve to meet the increasing demand for mountain biking. This includes building new progressive trails, improving connectivity between existing riding areas, and formalizing unofficial trails.</p> <p>Upgrading Existing Facilities: I back the enhancement of current biking facilities, such as installing water fountains, toilets, and bike wash stations at Wynyard Jump Park. Additionally, I support formalizing the trail network on Queenstown Hill, with plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track.</p> <p>Collaboration with QLDC: Ensuring QMTBC's Trail Master Plan aligns with QLDC's Trail Masterplan is essential for coordinated trail development and improved access. This includes proposed new uphill trails and trail links from key access points like Lakeview and Lomond Crescent.</p> <p>Safety and Trail Management: I support efforts to improve safety, such as separating riders and walkers on shared trails with bridges and overpasses. I also advocate for more accessible trail areas, such as a Skybridge over One Mile Creek, to enhance both safety and trail flow.</p> <p>Environmental Integration: I endorse plans to integrate trail development with environmental restoration efforts. This includes collaboration between QMTBC and QLDC on tree felling and replanting in Queenstown Hill Reserve, as well as careful planning for future biking trails in areas where pine trees are being removed.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expanded mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for improved safety, wayfinding and signage.</p> <p>Noted support for trail development with environmental restoration efforts.</p>
68	Mel Bowles		No	Support	It will be great to see improvements and better maintenance to the existing trail network. More trails would be welcomed and it would be great to have the vision to look to connect as many of them as possible to create variety for long term residents. a connection between fernhill loop and ben lomond trails and into moonlight or over the moke lake. Please also consider how these trails could connect to other areas like Arawata Track, Sunshine Bay and Seven Mile to make interesting long through hikes or bike rides, or even multi day trips that pass DOC or QLDC camping areas. Consider how this plan works with the plans of the Queenstown Trails Trust.	Noted support for a an expanded and well connected trail network.
69	Michael Quante		No	Support	I support Queenstown Mountain Bike Club (QMTBC) and QLDC continuing to work on existing trails (to maintain them and to improve safety, e.g. separating walkers and bikers) and to develop new trails in the Ben Lomond Reserve and the Queenstown Hill Reserve. As there is a growing demand for mountain biking, if new trails are not developed, there is a risk that existing trails will become overcrowded and dangerous. As Queenstown is now becoming a tourist summer destination as much as a winter destination, and mountain biking is a key attraction, it makes sense to continue growing our trail network.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p>

<p>70 Michael Robson</p>	<p>No</p>	<p>Oppose</p> <p>Thank you for the opportunity to provide feedback on the future management of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the effort that has gone into drafting this document and the community engagement undertaken so far. I am generally supportive of the objectives and policies outlined in the Draft Plan, particularly those aimed at promoting and enhancing recreational facilities and access to the Reserves. However, I strongly oppose certain elements of the Draft Plan that require further revision to better align with community interests and improve outcomes for both residents and visitors.</p> <p>Below, I provide specific commentary on selected sections of the Draft Plan, referencing relevant portions of the document.</p> <p>Section 8.2 – Primary Users and Activities (Te Tapunui Queenstown Hill Reserve)  "Unauthorised mountain biking tracks have also been developed with the...."  The term unauthorised has a specific legal meaning under the Reserves Act 1977 that does not align with its inferred usage in the Draft Plan. The use of this term should be reconsidered.  Furthermore, the Draft Plan downplays the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. Strava heat-map data shows well-established trails, some of which have existed for over 20 years.</p> <p>Key Points:</p> <ul style="list-style-type: none"> <li>•Queenstown Hill Reserve is one of three all-weather, all-year mountain biking areas accessible from Queenstown (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation).</li> <li>•The unique trail characteristics and proximity to the CBD make this network internationally significant.</li> <li>•The Draft Plan should acknowledge the current use of these trails by residents and visitors.</li> <li>•While these trails may be considered unsanctioned or unofficial, the plan should work collaboratively with the MTB community to formalize them where appropriate.</li> <li>•Section 13.2 should include new objectives and policies specific to MTB trails on Queenstown Hill.</li> <li>•Ignoring the existing trail network due to a lack of compliance resources is not a sustainable approach.</li> <li>•These updates would align the Draft Plan with the 2005 Reserve Management Plan, which provided for designated MTB trails.</li> </ul> <p>Section 13.1.4 – Ben Lomond Bike Trails  "Consideration will have to be given to the bike trail network when the vegetation removal occurs."</p> <p>This wording implies that the removal of exotic tree species in Ben Lomond is inevitable. While early community engagement has influenced the Draft Plan, I do not believe this wording accurately reflects the broader community's perspective.  Many residents are unaware that tree removal is being considered. The strong public backlash against the damage caused to Queenstown Cemetery following forestry operations in Ben Lomond Reserve indicates significant community concern.  Moreover, the assumption that bike trails can be preserved after tree removal is incorrect. The existing trails rely on tree cover to prevent erosion and maintain usability. Without this canopy:</p> <ul style="list-style-type: none"> <li>•The terrain is too steep and the soil too shallow to sustain trails.</li> <li>•The loss of trees would drastically impact the long-term viability of the biking network.</li> </ul> <p>Section 14.3.1 – Landscape Protection Forestry  "Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir."  This section lacks the qualifying statements found in Section 14.3.2, which propose a staged approach followed by a revegetation program.</p> <p>Concerns:</p> <ul style="list-style-type: none"> <li>•Why is urgent action needed for Queenstown Hill, while Ben Lomond is given a more balanced, staged approach?</li> <li>•The Draft Plan prioritizes wilding removal over other significant community concerns.</li> <li>•Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve.</li> </ul> <p>Section 14.6.9 – Biking &amp; Walking Tracks  "Remove and rehabilitate unauthorised tracks and trails."  Historically, many of Queenstown's best and most frequently used MTB trails began as unauthorised trails.</p> <p>The Draft Plan should:</p> <ul style="list-style-type: none"> <li>•Provide an amnesty to incorporate well-established trails into the official network where appropriate.</li> <li>•Foster collaboration with the MTB community to balance the need for compliance with preserving a world-class biking destination.</li> <li>•Avoid a heavy-handed approach that could erode community trust and cooperation.</li> </ul> <p>General Comments on Wilding Tree Removal  The Draft Plan leans heavily towards wilding conifer removal, often at the expense of recreational users and broader community benefits. While wildings present ecological challenges, they also provide significant recreational, social, and economic value.</p>	<p>Noted support for mountain biking.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p>
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ecological challenges, they also provide significant recreational, social, and economic value.

Key considerations:

•Erosion and Geotechnical Stability:

- oThese Reserves consist of steep, geologically unstable slopes.
- oTrees provide natural stabilization, reducing the risk of landslides and rockfalls.
- oAlternative mitigation measures, such as engineered rockfall fences, would be prohibitively expensive and visually intrusive.

•Community Identity and Landscape Aesthetics:

- oTwo generations of Queenstown residents have known these Reserves as forested landscapes.
- oThe removal of trees would significantly alter the town's iconic backdrop.

•Carbon Sequestration and Economic Impacts:

- oThese forests sequester tens of thousands of tonnes of carbon annually.
- oDeforestation would result in significant carbon emissions, taking decades to offset even if revegetation occurs.
- oSome forest areas may fall under the Emissions Trading Scheme, incurring costs that are not accounted for in the Draft Plan.

•Impact on Mountain Biking Tourism:

- oThe Draft Plan acknowledges the economic benefits of mountain biking but does not assess the financial impact of tree removal.
- oWithout tree cover, trails will be subject to freeze-thaw cycles, rendering them unusable for much of the year.
- oThe only significant local MTB network outside of established forests (Coronet Peak) requires costly annual maintenance and cannot be ridden in wet conditions.
- oBy 2026, mountain biking is projected to generate \$210M annually—50% of the ski industry's value (Benji Patterson, economic analysis).
- oTree removal would undermine Queenstown's reputation as a year-round mountain biking destination, with significant economic consequences.

Conclusion

As a long-term resident and frequent user of these Reserves, I urge the Council to adopt a more balanced approach that recognizes the benefits of maintaining selected forested areas. Rather than pursuing complete eradication of wildings, the Draft Plan should evaluate the cost-benefit ratio of containment and selective management.

71 Miles Holden	No	Neutral		
72 Molley	No	Support	Trail Expansion and Development: I am in support of QMTBC and QLDC expanding the trail networks in the Ben Lomond Reserve and the development of the Queenstown Hill Reserve to accommodate the growing demand for mountain biking. Including creating new progressive trails, improving connections between riding areas, and formalizing unofficial trails. Upgrading Existing Facilities: I am in support of enhancing existing bike facilities, such as installing water fountains, toilets, and bike washdown areas at Wynyard Jump Park, and formalizing the trail network in Queenstown Hill, including plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track. Collaboration with QLDC: I support the importance of QMTBC aligning their Trail Master Plan with the QLDC Trail Masterplan to ensure coordinated trail development and improved access, including proposals for new uphill trails and trail links from key entrance points like Lakeview and Lomond Crescent. Safety and Trail Management: I support the proposal for safety improvements, such as separating rider and walker traffic on shared trails with bridges/overpasses and advocating for more accessible trail areas like a Skybridge over One Mile Creek to enhance safety and flow. Environmental Integration: I support plans to integrate trail development with environmental restoration efforts, including QMTBC and QLDC collaborating on tree felling and replanting in Queenstown Hill Reserve and the need for effective planning of future biking trails in areas where pine trees are being removed.	Noted support for mountain biking.  Noted support for expand mountain biking trail network in both reserves.  Noted support for reserve infrastructure to support mountain biking.
73 Moretta Excell	No	Neutral	Trail Expansion and Development: I am in support of QMTBC and QLDC expanding the trail networks in the Ben Lomond Reserve and the development of the Queenstown Hill Reserve to accommodate the growing demand for mountain biking. Including creating new progressive trails, improving connections between riding areas, and formalizing unofficial trails. Upgrading Existing Facilities: I am in support of enhancing existing bike facilities, such as installing water fountains, toilets, and bike washdown areas at Wynyard Jump Park, and formalizing the trail network in Queenstown Hill, including plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track. Collaboration with QLDC: I support the importance of QMTBC aligning their Trail Master Plan with the QLDC Trail Masterplan to ensure coordinated trail development and improved access, including proposals for new uphill trails and trail links from key entrance points like Lakeview and Lomond Crescent. Safety and Trail Management: I support the proposal for safety improvements, such as separating rider and walker traffic on shared trails with bridges/overpasses and advocating for more accessible trail areas like a Skybridge over One Mile Creek to enhance safety and flow. Environmental Integration: I support plans to integrate trail development with environmental restoration efforts, including QMTBC and QLDC collaborating on tree felling and replanting in Queenstown Hill Reserve and the need for effective planning of future biking trails in areas where pine trees are being removed.	Noted support for mountain biking.  Noted support for expanded mountain biking trail network in both reserves.  Noted support for reserve infrastructure to support mountain biking.  Noted support for trail master plan.  Noted support for improved safety, wayfinding and signage.
74 Nick Coleman	No	Neutral	I am concerned about the impacts of wilding Douglas fir removal in the draft plan. I appreciate the plan calls for considered and measured change to preserve the interests of all stakeholders. While beech trees are preferable to Douglas fir, Douglas fir is preferable to broom and gorse. I support the plan for allowing for reforestation with native and non-invasive exotic species. In a perfect world the hills would be covered in native beech forest, but It would be great to see tree cover again in my lifetime! I trust that the stability of the hillside will be considered before tree removal, but would like to point out that existing large trees have value as they are, wilding or not.  There is a clear contradiction in government policy regarding pine trees. On one hand, the government actively funds large-scale pine plantation projects for carbon sequestration under the Emissions Trading Scheme (ETS). On the other hand, local councils are spending public money to remove wilding pines, effectively reducing the very carbon sinks that the ETS relies upon. This inconsistency undermines the credibility of carbon offset programs. If pine trees are deemed valuable enough to justify government-funded planting, then their wholesale removal in established areas makes no sense.  Queenstown's forested hillsides provide a distinct character that sets the town apart from our drier, more barren neighbours. The tree cover contributes to the town's scenic beauty, a key draw for both residents and visitors. The removal of large areas of wilding pines will leave prominent hillsides exposed, altering the landscape in a way that diminishes Queenstown's natural appeal.  The proposed removal will have a major impact on Queenstown's world-class mountain biking network. The tree cover provides essential protection for trails, preventing erosion and allows riding during winter. Open landscapes also change the riding experience significantly—forested trails offer a sense of immersion and adventure that is lost when riders can see across an open mountainside to other trails. Additionally, some of trails currently in these forests, built over many years by volunteers, cannot simply be replicated by machine-built replacements in open areas. Hand-crafted single-track trails have a unique character that mass-construction methods cannot replicate, and their loss would be a major blow to the local biking community.	Noted opposition to wilding pine removal.
75 Nicole Haenz	No	Support		

76	Nicole Mesman	Individual	No	Neutral	<p>Submission on the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan</p> <p>Thank you for the opportunity to submit on the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan). I appreciate the work that has gone into the draft and the community engagement.</p> <p>I generally support the objectives and policies related to recreational facilities and access. However, I strongly oppose certain aspects of the Draft Plan and suggest improvements to better align with community wishes and enhance outcomes for residents and visitors.</p> <p>Section 8.2 – Queenstown Hill Reserve: The use of the term "unauthorised" to describe mountain biking trails misrepresents the situation. Many trails have been in use for over 20 years and are important for local and international riders. The Draft Plan should recognize this and work with the MTB community to formalize trails where appropriate, aligning with the 2005 Reserve Management Plan and the Reserves Act.</p> <p>Section 13.1.4 – Ben Lomond Bike Trails: The Draft Plan implies that exotic species removal on Ben Lomond is certain, without considering community concerns about the impact on biking trails. The trees play a crucial role in supporting the trails, and removing them could compromise their viability.</p> <p>Section 14.3.1 – Forestry Plan for Queenstown Hill: The Draft Plan's urgency around wilding conifer removal on Queenstown Hill overlooks the need for a balanced, staged approach, similar to Ben Lomond. Removing wilding conifers without a clear revegetation plan could lead to further invasive species problems, as seen elsewhere in the region.</p> <p>Section 14.6.9 – Biking &amp; Walking Tracks: The plan should recognize that many of Queenstown's best mountain bike trails began as 'unauthorised'. A collaborative approach is needed to convert established trails to the official network, maintaining the area's status as a world-class mountain biking destination.</p> <p>General Comments: The Draft Plan focuses heavily on wilding conifer removal, overlooking the significant recreational, social, and economic benefits these trees provide. The trees stabilize the terrain, protect against rockfall, and support biking and walking trails. Removing them could incur substantial costs, including loss of carbon sequestration, trail stability, and local tourism revenue.</p> <p>Conclusion: I urge a more balanced approach that acknowledges the value of the established mountain bike network and trees. Maintaining selected areas of forest can provide substantial environmental and economic benefits. The cost of containment may be lower than the harm caused by widespread deforestation.</p> <p>Yours sincerely, Nicole Mesman</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal of all wilding species.</p> <p>Noted support for staged approach to wilding pine removal if this is progressed.</p>
77	Nigel Lloyd		No	Neutral	<p>I support the expansion and development of the trail network (including low impact structures and infrastructure) and would like to see priority given to an uphill biking trail from town/Lomond Crescent. I believe that the commercial operators benefiting from the trail network should be required to take a bigger role in maintenance and development for all users, including self powered, and should be held responsible for provision of safety/medical patrol within the lower lift assisted trail network.</p> <p>Further commercial activities should be limited to low impact activities (no additional fixed structures that are not publicly accessible)</p> <p>The development of the upper portion of the reserve should be limited to self propelled recreation and i am strongly opposed to further development of commercial infrastructure such as lifts higher up in the reserve in order to maintain the more "backcountry" experience of the upper reserve.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for limited commercial activity that is low impact.</p> <p>Noted opposition to new fixed private fixed structures.</p> <p>Noted opposition to commercial infrastructure activity in upper reserve.</p>
78	Nikki Atkinson	Queenstown Mountain Bike Club	Yes		<p>See attached pdf submission.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expanded mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for trail master plan.</p> <p>Noted support for improved safety, wayfinding and signage.</p> <p>Noted support for bridge in Fernhill Loop Trail.</p> <p>Consider amendment to 13.1.4 to reflect that QMTBC manages the Ben Lomond Trails.</p> <p>Noted support for emergency helicopter landing site.</p> <p>Noted support for infrastructure to restrict freedom camping at Kerry Drive.</p>

79	Ollie Clements	n/a	n/a	Support	<p>Hi,</p> <p>Please see my submission below</p> <p>Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission</p> <p>Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort invested in developing the draft plan and acknowledge the community engagement undertaken so far.</p> <p>I generally support the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access. However, I have significant concerns regarding specific aspects that require further consideration to better align with community interests and ensure improved outcomes for residents and visitors.</p> <p>Below, I provide detailed feedback on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is quoted directly from the Draft Plan.</p> <p>Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve</p> <p>Unauthorised mountain biking tracks have also been developed with the....</p> <p>The term "unauthorised" has a specific legal implication under the Reserves Act 1977, which does not entirely align with its use here. I recommend reconsidering the wording for greater accuracy.</p> <p>Additionally, the Draft Plan underrepresents the significance of the mountain bike (MTB) trail network within Queenstown Hill Reserve. Strava heat maps show these trails have existed for over 20 years and are well-established.</p> <p>Queenstown Hill Reserve is one of only three all-season, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). Its natural features and proximity to the town center make it an internationally significant MTB destination.</p> <p>The Draft Plan should more accurately acknowledge the current use of the reserve by mountain bikers. While recognizing that these trails are 'unsanctioned' or 'unofficial,' the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be included in Section 13.2. Ignoring this established trail network due to resource limitations is not a viable long-term strategy.</p> <p>This revision would align the Draft Plan with the existing (2005) Reserve Management Plan, which permitted mountain biking with restrictions near the Time Walk track and required MTB use to be limited to designated and approved trails. Additionally, this approach aligns with the reserve's classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.</p> <p>Section 13.1.4 – Ben Lomond Bike Trails</p> <p>Consideration will have to be given to the bike trail network when the vegetation removal occurs.</p> <p>This phrasing implies that the removal of exotic species in Ben Lomond is inevitable. While community engagement has shaped the Draft Plan, the broader community may not fully support this assumption. The public backlash following damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve highlights strong community sentiment regarding tree removal.</p> <p>Additionally, assuming that bike trails will remain viable post-deforestation is problematic. Trail sustainability is closely tied to tree cover, which stabilizes steep terrain and maintains suitable soil conditions. The Draft Plan should acknowledge these challenges.</p> <p>Section 14.3.1 – Landscape Protection Forestry</p> <p>Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.</p> <p>This section lacks the qualifying statements found in Section 14.3.2, which proposes a staged removal process followed by revegetation. Why is immediate action prioritized for the Queenstown Hill Forestry Plan without a similarly balanced approach?</p> <p>The plan must also consider the unintended consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, phased approach integrating revegetation efforts is necessary to prevent ecological and landscape degradation.</p> <p>Section 14.6.9 – Biking &amp; Walking Tracks</p> <p>Remove and rehabilitate unauthorised tracks and trails.</p> <p>The Draft Plan does not acknowledge that many of Queenstown's most popular and well-used MTB trails began as 'unauthorised' tracks. Instead of a blanket removal policy, an amnesty should be considered to assess and integrate well-established trails into the official network where appropriate.</p> <p>A collaborative approach with the MTB community would encourage greater acceptance of formalizing certain trails while decommissioning others. A rigid stance risks alienating a key user group and undermining long-term compliance.</p> <p>General Comments</p> <p>The Draft Plan prioritizes wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced assessment is needed to weigh the financial and environmental costs of removal against alternative management strategies.</p> <p>Key considerations missing from the Draft Plan include:</p> <ul style="list-style-type: none"> <li>•Slope Stability &amp; Natural Hazard Mitigation: The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions, making them potentially unaffordable for the community.</li> <li>•Historical and Aesthetic Value: Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown's identity.</li> <li>•Economic Considerations: While the Draft Plan acknowledges the economic benefits of mountain biking, it does not address the financial impact of removing MTB trails or forested areas. Research estimates that MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism.</li> <li>•Trail Sustainability &amp; User Experience: Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown's appeal as a year-round MTB destination.</li> <li>•Carbon Sequestration: These forests sequester tens of thousands of tonnes of carbon annually. Their removal would generate significant carbon emissions, taking decades to offset even with replanting efforts.</li> <li>•Regulatory Flexibility: The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than full eradication. A managed retention strategy could be explored instead of wholesale removal.</li> </ul> <p>Conclusion</p> <p>As a long-term resident and frequent user of both reserves, I urge the Draft Plan to take a more balanced approach. Queenstown's world-class mountain biking network has thrived within these established forests because they provide an environment conducive to sustainable trails.</p> <p>A comparison of deforested MTB trails versus those within forested areas reinforces this point. The Coronet Peak trails, which exist outside a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.</p> <p>If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.</p> <p>Yours sincerely,</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>
80	Paul Tustin	None	No	Support	<p>I agree with the broad thrust of the plan. I support the revegetation proposal. However, it would good for this to be phased to allow continued use of the tracks and reserve.</p>	<p>Noted support for phased approach to vegetation management.</p>
81	Paula Hugens	eZED Limited	Yes	Support	<p>My submission is with regards to Section 13.1.6 to the Tiki Trail and Brecon Street Entrance.</p> <p>I agree with the objectives of the plan for it to be the primary walking trail on the reserve.</p> <p>The focus is only on the entrance area however the whole trail needs to be considered in the plan for the objective to be achieved.</p>	<p>Noted support for Tiki Trail remaining a walking only trail.</p>

82	Peter & Jan Williams		No	Neutral	<p>I think more control of noxious weeds (wilding Pines mostly) is needed urgently, the adult pines are a huge source of seeds for the whole area, in our case have spoiled the view, (used to be able to see from Walter Peak to Wye Creek and round to Bobs Peak, now an ever narrowing tunnel down Thompson St and also cut down our sunshine hours, in the winter, no sun for 12 weeks, used to be 6 so have extra heating costs. and lack of enjoyment of our property, much less sun in the afternoons.</p> <p>Dogs should not be permitted to run free, because them and other predators, plus native plant species being overgrown by pine trees have wreaked havoc on the native birds in the One Mile Area, we used to see a covey of 20 or more Quail on our lawn, this year we have seen 2 quail</p> <p>Control of weeds along the One Mile Creek walkway and the reserve area close to town would make a better experience for users of the track, 3 neighbours combined, spent approx \$4500 tidying it up about 10 years ago hoping QLDC would maintain it, no way, no money the excuse? How did Mt Iron and the Ladies Mile sections justify millions when QLDC cannot look after the property it already owns.</p> <p>CLEAN UP THE WHOLE AREA OF PINES, GET THE AREA PREDATOR FREE AND PLANT NATIVES</p>	<p>Noted support for wilding pine removal and native revegetation.</p> <p>Noted support for more restrictive dog controls.</p> <p>Noted support for maintaining existing trail network.</p>
83	Peter De La Mare		No	Support	<p>Section 13.1.4 Consider consulting with Lakes District Helicopter Rescue Trust whether they would like to have trees cut in the top of the Wynyard Jump Park to improve helicopter rescue access and maybe build a landing pad - there have been about 6 winch rescues already this year, and each one has involved a lot of flying time with the winch.</p> <p>Section 13.1.7 The map has Sainsbury Road incorrectly labelled as Wynyard Crescent. The map does not show the walking tracks very clearly, and a key would help. Apart from being shown on the map, there does not appear to be any reference to the Cameron Place to Thompson Street walking/biking trail anywhere in the Draft Plan - surely there should be a separate paragraph to cover this, and the Cameron Place entrance.</p> <p>Section 14.6.7 add number h. "whether financial or physical works should be required to contribute to wilding pine removal, native plant revegetation, and pest animal trapping."</p>	<p>Consider supporting for emergency helicopter landing site.</p> <p>Consider suggested amendments to RMP maps to ensure correct street names and all reserve entrances identified.</p>
84	Reuben Costello		No	Support	<p>Trail Expansion and Development: I am in support of QMTBC and QLDC expanding the trail networks in the Ben Lomond Reserve and the development of the Queenstown Hill Reserve to accommodate the growing demand for mountain biking. Including creating new progressive trails, improving connections between riding areas, and formalizing unofficial trails.</p> <p>Upgrading Existing Facilities: I am in support of enhancing existing bike facilities, such as installing water fountains, toilets, and bike washdown areas at Wynyard Jump Park, and formalizing the trail network in Queenstown Hill, including plans for dual slalom/jump lines and asphaltting the Kerry Drive pump track.</p> <p>Collaboration with QLDC: I support the importance of QMTBC aligning their Trail Master Plan with the QLDC Trail Masterplan to ensure coordinated trail development and improved access, including proposals for new uphill trails and trail links from key entrance points like Lakeview and Lomond Crescent.</p> <p>Safety and Trail Management: I support the proposal for safety improvements, such as separating rider and walker traffic on shared trails with bridges/overpasses and advocating for more accessible trail areas like a Skybridge over One Mile Creek to enhance safety and flow. Environmental Integration: I support plans to integrate trail development with environmental restoration efforts, including QMTBC and QLDC collaborating on tree felling and replanting in Queenstown Hill Reserve and the need for effective planning of future biking trails in areas where pine trees are being removed</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p>
85	Robert Lyons		No	Support	<p>Queenstown truly has some of the best mountain biking, and access to riding, on a global scale. It's what drew me in as a tourist 6 years ago, and what keeps me here now as a rate payer. What separates Queenstown from a lot of other places I've lived is the capacity of the local club (QMTBC) to work alongside the local council (QLDC) instead of against it. It's refreshing for a governing body to see mountain biking as a community resource and economic draw, instead of a nuisance for distractable teenagers. This looks to be true for all sorts of activities like walking/tramping/watersports/climbing etc., but I can only really speak from a mountain biking perspective</p> <p>I'd love to see more trails around Queenstown, both in existing reserves like Ben Lomond and in new locations like Queenstown Hill Reserve. Formalised sanctioned trails for all abilities (including expert level riders) can help to keep all trail users safe.</p> <p>More facilities around the trail networks like water fountains, toilets and wash facilities at biking hubs like Wynyard and Ben Lomond Trails (beyond those at Skyline) would help keep our waterways safe, and managed tree felling and native planting that keeps our resources available and useable would be amazing!</p> <p>I love to see collaboration between QMTBC and QLDC, as it makes me feel like a valued member of our community, not just a grungy dirtbag (rate paying) mountain biker.</p> <p>One specific thing I'd love to see is better signage and separation of the shared use Fernhill loop track. There are some parts of that trail that are quite high speed on a bike, and the signage around the Ben Lomond trails midway hub can be really hard to follow for walkers.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p> <p>Noted support for improved wayfinding and signage.</p>
86	Roderick Allan		No	Support	<p>Very much in support of the proposed new entrance to the Queenstown Hill reserve Tree Tops Rise entrance as stated in 13.3.2. As a resident and ratepayer, would welcome this very valuable means of access to an area of outstanding natural beauty for the enjoyment of all. Would also help to reduce the use of cars and transport to get to the current entry point close to the town.</p>	<p>Noted support for policy 13.3.2 reserve entrance at Tree Tops Rise</p>
87	Rory Bingham		No	Support	<p>I support the provisions in the RMP that encourage more mountain bike trail development and improving the user experience for recreation users.</p> <p>Improving infrastructure throughout the reserve, but particularly at the various entrances will provide much needed amenity to reserve users. Our trail network is world class, yet how users access it is not - take Rotorua MTB for example, with toilets, showers, businesses and plenty of carparks available, the user experience is much more reflective of the quality of the trails. Would love to see more of this.</p> <p>Improving emergency service access, planning and funding for extracting injured persons off the reserve would be great to see - especially when considering new track developments.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p>
88	Ryan Purcell	Bike community member, regular reserve use	No	Support		

89	Sam Bates	N/A	N/a	Support	See attached pdf submission.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>
90	Samantha Collyer		No	Oppose	Development of this area will be a loss of ecology and sensitive areas that people already use for passive activities. Inappropriate to have commercial interests such as mountain biking taking over environmental sensitive areas. As pointed out more needs to be spent on Ecology and biodiversity- quiet contemplative spaces are essential as climate change is upon us.	Noted opposition to expanding development and new mountain biking trails.
91	Samson sands-davies	Queenstown catering	No	Support	Mountain biking is becoming what Queenstown is known for around the world and we need to support this.	Noted support for mountain biking.
92	Sara Bradley	N/a	N/a	Support	See attached pdf submission.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>
93	Sean Dean	Skyline Enterprises Limited	Yes	Support	See attached pdf submission.	<p>Consider request for recognition of Bob's Peak and facilities as an "Icon Destination" due to significant contribution to tourism and recreation.</p> <p>Consider several wording changes to sections, policies and descriptions in the plan. Noted suggested changes to maps as current maps are not considered accurate.</p> <p>Consider amendment to record expansion of the Skyline restaurant building and policies that are more enabling of commercial activity.</p> <p>Noted not considered wildfire risk is adequately considered in draft plan. Noted support for limited grazing as a fire and weed control method and stronger goat control policy.</p> <p>Noted support for wilding pine removal where an updated forestry plan is implemented. Notes support for native revegetation and pest control.</p> <p>Noted support for promoting commercial and informal recreation.</p> <p>Noted support for greater emphasis on wildfire prevention and ecological restoration.</p>
94	Sean Dean	Queenstown Commercial Parapenters Limited trading as GForce Paragliding	Yes		See attached pdf submission.	<p>Consider request for recognition of Bob's Peak as an "Icon Destination" due to significant contribution to tourism and recreation.</p> <p>Consider several wording changes to sections, policies and descriptions in the plan. Noted suggested changes to maps as current reserve maps don't show all lease areas.</p> <p>Noted that the submission does not consider wildfire risk is adequately considered. Noted support for limited grazing as a fire and weed control method and stronger goat control policy.</p>
95	Sean McCarroll		No	Support		

96	Sean McLeod		No	Support	<p>The wildfire risk only addresses the risk on the reserves and does not address the risk to the adjoining properties and people in Goldfields, St Andrew's Park, Larchwood Heights, Commonage, Industrial Place, Thompson Street, and Fernhill. As soon as possible, a 100-200m strip of Wilding Pines should be removed as a fire break to reduce the risk to property and lives if a fire ever took hold in either reserve. This fire break will also significantly reduce the wildfire risk to the reserve from the adjoining properties,</p> <p>Wilding pine removal in the reserve area above Goldfields was programmed several years ago, but priorities changed, I believe this was postponed to concentrate on Coronet Forest. This project should be recommenced.</p> <p>The plan requires a higher priority for the removal of wilding pines, the current model of 'as funding is available' is not viable. If funding is not available or is limited, then the trees win and any progress made to date is lost. It will never be cheaper to remove the trees than it currently is as they only grow more and continue to spread, Areas within the Ben Lomond reserve where the trees have been removed previously are getting re-populated with noxious weeds and wilding pines and these require a maintenance program to reduce the wilding pine and wildfire risk.</p> <p>I generally agree that commercial activity within the reserves should take place as long as it comes as a profit back to the rate payers of Queenstown in the form of reduced rates. All leases should be in the form of a percentage of revenue, with a minimum fixed fee, whichever is higher. The reserves are large, so there can be some impact on recreation users in some areas when allowing for commercial activities.</p> <p>14.3.3.c consent conditions should not take priority over removal of wilding pines or the reduction in fire risk to people or property.</p> <p>14.5.2.d - As the gondola runs closer to east-west than north-south, restricting activity on the northern side of the gondola rather than the eastern side, would be a better description.</p> <p>14.5.3 again north of the gondola is a better description than east</p> <p>Allow for better access and parking in the reserves, particularly at Silver Creek, Kerry Drive, Skyline access road, One mile, and wherever else access to the reserves is possible.</p>	<p>Comments regarding operational wild fire control not applicable (relevant to QLDC Activity Controls to Manage Wildfire Risk within Reserves Policy).</p> <p>Consider amendment to 14.3.3.c to support wilding pine removal.</p> <p>Consider amendment to 14.5.2.d and 14.5.3 to more accurately describe location where development is restricted in Ben Lomond Reserve.</p> <p>Noted support for better access and parking at reserve entrances.</p>
97	Southern Infrastructure Limited c/- Tim Williams	Southern Infrastructure Limited	Yes	Support	See attached pdf submission.	<p>Noted support of development of public gondola transport system within Te Tapunui Queenstown Hill Reserve.</p> <p>Consider amendments to section 1. A and policies 14.5.15 and 14.5.9 and an additional objective in Section 12 to support a gondola system through the reserve.</p>
98	Steve Carry		No	Support	<p>Environmental Integration: I support the integration of trail development with environmental restoration efforts, particularly through collaboration between QMTBC and QLDC on tree removal and replanting in the Queenstown Hill Reserve. Furthermore, it is essential to carefully plan future trails in areas where pine trees are being removed to ensure environmental sustainability.</p> <p>Trail Expansion and Development: I fully support the efforts of QMTBC and QLDC to extend and enhance the trail networks within the Ben Lomond and Queenstown Hill Reserves to meet the increasing demand for mountain biking. This includes the creation of new progressive trails, better connectivity between riding areas, and the formalization of unofficial trails.</p> <p>Safety and Trail Management: I endorse proposals for enhanced safety measures, including separating rider and pedestrian traffic on shared trails using bridges or overpasses, as well as advocating for more accessible trail areas, such as a Skybridge over One Mile Creek, to improve safety and traffic flow.</p> <p>Collaboration with QLDC: I support QMTBC aligning its Trail Master Plan with the QLDC Trail Masterplan to ensure a unified approach to trail development and improved access. This collaboration should include proposals for new uphill trails and connections to key entry points, such as Lakeview and Lomond Crescent.</p> <p>Upgrading Existing Facilities: I am in favor of upgrading the current biking amenities, such as adding water fountains, toilets, and bike wash stations at Wynyard Jump Park, as well as formalizing the Queenstown Hill trail network. This also includes plans to introduce dual slalom and jump lines, as well as asphaltting the Kerry Drive pump track.</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for reserve infrastructure to support mountain biking.</p>
99	Steven Peters		No	Support	<p>My main interest lies in the future management of the forest and its transition from exotic to native. As a resident on Wynyard crescent i use the reserve/forest on a daily basis and it was the reason i bought a house in Fernhill. Simple pleasures for me and my family is a walk into 2 mile creek and a frolic in the water ( more my 2 year old than me !) or a quick lap on the mountain bike up to the saddle utilizing one of the best semi urban mountain bike trail networks in the world.</p> <p>I will support the removal of the exotics only when there is a plan in place to replant the area with natives in a managed fashion. The idea to just spray and walk away is terrible ! Lets lock in a plan with us the Fernhill community to replant and restore the forest to its former glory, slowly i might add in bite sized chunks !</p>	<p>Noted support for mountain biking.</p> <p>Noted support for phased wilding pine removal.</p>
100	Suzanne Rose (Sue)	Whakatipu Wilding Control Group (WCG)	Yes		See attached pdf submission.	<p>Noted support for wilding pine removal.</p> <p>Consider several suggested amendments to sections and policies as outlined in pdf submission.</p>

101	Thomas Allen	N/a	N/a	Support	<p>Please see my submission below regarding this plan submission.</p> <p>Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission.</p> <p>Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort that has gone into developing the draft plan and acknowledge the community engagement undertaken to date. I am generally supportive of the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access to the Reserves. However, I have significant concerns regarding specific aspects of the Draft Plan that require further consideration to better align with community interests and ensure improved outcomes for both residents and visitors.</p> <p>Below, I provide detailed commentary on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is taken directly from the Draft Plan.</p> <p>Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve  Unauthorised mountain biking tracks have also been developed with the....  The term “unauthorised” carries a specific legal connotation under the Reserves Act 1977 that does not fully align with its use in this context. The wording should be reconsidered to ensure clarity.</p> <p>Additionally, the Draft Plan appears to downplay the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. These trails, as evidenced by Strava heat maps, have been in place for over 20 years and are well-established. Queenstown Hill Reserve is one of only three all-year, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). The natural features and proximity to the town center make this MTB area internationally significant. The Draft Plan should be updated to accurately reflect the current use of the Reserve by mountain bikers. While acknowledging that these trails are ‘unsanctioned’ or ‘unofficial,’ the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be incorporated into Section 13.2. Ignoring this well-established trail network due to resource constraints is not an acceptable long-term strategy.</p> <p>Such revisions would align the Draft Plan with the existing (2005) Reserve Management Plan, which provided for mountain biking with restrictions near the Time Walk track and a requirement that MTB use be limited to formed and approved trails. Additionally, this approach would be consistent with the Reserve’s classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.</p> <p>Section 13.1.4 – Ben Lomond Bike Trails  Consideration will have to be given to the bike trail network when the vegetation removal occurs.  This wording suggests that the removal of exotic species in Ben Lomond is inevitable. While community engagement has guided the Draft Plan, the broader community may not fully support this assumption. The backlash following the damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve demonstrates strong community sentiment regarding tree removal.  Furthermore, the assumption that bike trails can be maintained post-deforestation is flawed. The presence of trails is intrinsically linked to the established tree cover, which stabilizes steep terrain and maintains suitable soil conditions for trail sustainability. The Draft Plan should acknowledge these challenges.</p> <p>Section 14.3.1 – Landscape Protection Forestry  Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.  This section lacks the qualifying statements found in Section 14.3.2, which outline a staged approach followed by revegetation efforts. Why does the Queenstown Hill Forestry Plan require immediate action without a similarly balanced approach?  The plan must consider potential negative consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, staged approach that integrates revegetation efforts is necessary to avoid unintended ecological and landscape degradation.</p> <p>Section 14.6.9 – Biking &amp; Walking Tracks  Remove and rehabilitate unauthorised tracks and trails.  The Draft Plan fails to acknowledge that many of Queenstown’s best and most frequently used MTB trails began as ‘unauthorised’ trails. Instead of blanket removal, an amnesty should be considered to incorporate well-established tracks into the official network where appropriate.  A collaborative approach with the MTB community would result in higher acceptance of formalizing some trails while decommissioning others. An overly rigid stance risks alienating a key user group and undermining compliance efforts.</p> <p>General Comments  The Draft Plan leans heavily toward wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced discussion is required to assess the financial and environmental costs of removal against alternative management strategies.  Key considerations missing from the Draft Plan include:</p> <ul style="list-style-type: none"> <li>•Slope Stability &amp; Natural Hazard Mitigation: The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions of dollars, which may be unaffordable for the community.</li> <li>•Historical and Aesthetic Value: Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown’s identity.</li> <li>•Economic Considerations: The Draft Plan acknowledges the economic benefits of mountain biking but does not address the financial impact of removing MTB trails or forested areas. Research estimates MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism.</li> <li>•Trail Sustainability &amp; User Experience: Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown’s attractiveness as a year-round MTB destination.</li> <li>•Carbon Sequestration: These forests capture tens of thousands of tonnes of carbon annually. Removal would result in significant carbon emissions, taking decades to offset even with replanting efforts.</li> <li>•Regulatory Flexibility: The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than requiring full eradication. A managed retention strategy could be considered instead of wholesale removal.</li> </ul> <p>Conclusion  As a long-term resident and frequent user of both reserves, I urge the Draft Plan to adopt a more balanced approach. Queenstown’s world-class mountain biking network has flourished within these established forests because they provide an environment conducive to sustainable trails. Comparing deforested MTB trails to forested ones highlights this point. The Coronet Peak trails, which exist outside of a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.  If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, then maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.</p> <p>Yours sincerely,</p>	<p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to “Unauthorised”.</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>
102	Tiago Leme		No	Support		
103	Tom Gray		No	Neutral	<p>I believe there should be a strong focus on improving safety within the Ben Lomond trail network for hiking and biking. Signage is limited for public and emergency services, quite often having issues of almost hitting hikers walking the incorrect way and being lead on a MTB trail. As well as no clear signage or waypoints on any trail network to help aid emergency services and their access to the area. I also believe strongly that skyline and QMTBC should be funding full time patrol staff for the trail network with first aid training to be first responders to incidents within the trail network and help emergency services when necessary.</p>	<p>Noted support for improved emergency services and access, signage and wayfinding.</p>

104	Tom Hey	Submitting as a passionate trail user	Yes	Support	<p>Hi, Thank you for the opportunity to provide feedback on the &amp; Te Tapunui Queenstown Hill Reserve Management Plan. As a passionate trail user and advocate I realise the importance of these reserves to the quality of locals lives and the experience for visitors. Being so close to the Queenstown town centre they are a gateway to the immediate 'outdoors' and an access way to the epic back country we have here. With this in mind they have many and varied users that all have specific needs. Not an easy job! In general I support the draft plan but would like to comment on the following: Disclaimer: I own a commercial trail building company and have worked in both of the reserves but I am commenting on this plan as a local who is passionate about Queenstown and it's trail network.</p> <p><b>Trail network expansion, development and maintenance</b> I would like to see a comprehensive trails master plan that incorporates all user groups across the whole Whakatipu basin. As trails within these reserves cross reserve boundaries into DoC/private land etc the plan needs to consider all areas within the basin, not just the reserves as they all need to integrate together. The plan should involve all stakeholders such as QLDC, DoC, QMTBC, Queenstown Trails, Horse riders, Walkers, 4wd/motorbikers, hunters and trail runners so all user groups are given the chance to have input and be catered for in the plan. As there are lots of areas of private land bordering reserve land it would be good to see QLDC working with private landowners to secure long term existing and future access to create the best possible network. It is great to see that QLDC have a trail specific ranger on the team and I believe this will help achieve a great network in the future. This plan should then be available to the public so users can see that there is a long term plan.</p> <p><b>Te-Taumata-o-Hakitekura Ben Lomond</b> I support the ongoing development and maintenance of the Queenstown Bike Park and would like to see more ownership by Skyline enterprises especially when it comes to a medical patrol. There has been talk of a levy on lift tickets/rental bikes etc to cover patrol and maintenance costs and I think this would be a good way of funding any shortfall to manage these issues. For trail maintenance I think it would be cost effective to address any areas that have repeated maintenance issues with long term fixes such as re-routes to keep long term maintenance costs lower. An in house maintenance crew and patrol funded by lift ticket sales/levy for the trails immediately accessed by the Skyline Gondola would also be a more cost effective solution. QMTBC should be concentrating on new trail development and maintenance on trails outside of the 'bike park'. As volunteers this takes up a considerable amount of their time which could be spent elsewhere. Unauthorised trail building should be managed to avoid trails dissecting walking trails, creating shortcuts and making wayfinding confusing. Fernhill loop track could be improved in some areas as new trails around it have changed its functionality</p> <p><b>Te Tapunui Queenstown Hill</b> There has been an unofficial trail network on Queenstown Hill for over 10 years now and it is well loved by local mountain bikers. Although illegal it functions well and is a good asset to those that use it. Trails are generally advanced to extreme. In the long term it would be good to see this trail network legalised and managed to mitigate the effects of wilding pine removal and to ensure the MTB trails do not negatively impact the walking experience. With no management there is potential for walkers to become lost as only the walking track is signposted. If the network were managed then some existing trails would be suitable but it would be good to design a user friendly network to create a close to town asset for multiple user groups. I don't have too much knowledge about the block of land for sale at the top of but it would be shame to see a public recreation reserve have a less quality experience if land was sold off.</p> <p><b>Unauthorized trail building</b> Unauthorized trail building is rife in both reserves and I think it's important to ask why this is happening rather than just trying to stop it. These 'pirates' are passionate trail users trying to fill a gap they perceive to be in the trail network. Some trails are definitely not in suitable locations but there is obviously a demand for more technical trails that trail organisations are not providing for. QMTBC have mainly been focussing on intermediate trails lately which is understandable as they cater for a wide range of users and are very popular. However without a visible plan that shows there are technical trails being planned in suitable areas then people have been taking it on themselves to build them. This should all be addressed in the long term network plan where areas for all grades of trail will be identified and then these more technical trails can be built legally in areas where they fit. These trails are cheap to build and maintain so it makes sense to put energy towards managing them rather than stopping them. QMTBC/QLDC could identify areas for technical trails, gain approval and get experts to mark the lines to ensure they fit within the long term plan and don't affect other user groups. They are also a great way to get volunteer involvement as they can be built with hand tools. The issues with 'pirate trails' differ in the Queenstown Bike Park and in the wider network as they have different access types and traffic.</p> <p><b>Wilding Pine Removal</b> This is obviously a big topic in the region and in the big picture needs to be addressed. I support the removal of wilding pines but only if the plan is fully followed through with long term management and replanting with native / non invasive species. It seems as if you don't get rid of 100% of wilding pines then large scale logging could be a pointless exercise? Wilding pines will out compete native trees so if one reserve is logged but private land next door is not then the trees will still spread. The logging of trees has negative environmental, recreational and economic impacts so the long term benefits should be guaranteed. I work in lots of areas where wilding pines have been logged recently but there are always a few left over and are still spreading seeds which is apparent with regrowth of new pines quite quickly. Once the pines are felled it is extremely difficult to get back in to cut the regrowth so it's a vicious circle. With regards to trails there should be lots of thought as to how the trees are killed. Trees in the fernhill loop area have been sprayed about 8 years ago and now it is really dangerous as they are too dangerous to fell but the trails are still open. Soon I think the trees will be falling over in the wind and these areas of reserve will need closed to the public. Areas with no trails have had the trees felled which makes any type of trail planning and building incredibly difficult and dangerous. Some of these areas have plans for trails through QMTBC but this has not been communicated to the wilding pine group. This should be addressed in the long term network plan.</p> <p><b>Access areas and facilities</b> I support new access ways to the reserves and believe they should be as low in elevation as possible to avoid the reliance on a car to reach the trail head. It would be great to see the one mile track be re-designed to be an easy dual use entrance to the fernhill trail network The 2 current trails from the one mile roundabout are too steep. It would be good to see a quality commuter trail up to fernhill to make it easier for fernhill residents to commute by bike/foot which would also reduce maintenance costs. The trail from thomson st to cameron place also needs re-routing as money spent on the existing alignment is a waste (including the recent resurfacing works). Kerry Drive would be a good entrance to Queenstown Hill and would need a good trail design to cater for all user groups.</p> <p><b>Signage and wayfinding</b> I support the proposal to improve signage and wayfinding as both reserves have the potential to provide user friendly recreation experiences straight from town without the use of a car but I think the current network is confusing if you do not know the area well. It would be important to consider the trail network as well as signage to create user friendly loops and this would be part of the wider network plan.</p> <p>Thanks again for the opportunity to provide feedback. There are lots of groups trying to do their thing so I can imagine it's hard but in general it works and the reserves make QT an awesome place to live! It would just be nice to develop a method to the madness! Open to give any more feedback if requested!</p>	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Noted support for comprehensive trails master plan incorporating all user groups.</p> <p>Noted support for management of unauthorised trail building.</p> <p>Noted support for improvements to Fernhill Loop track.</p> <p>Noted support for wilding pine removal.</p> <p>Noted support for low elevation reserva entrances.</p> <p>Noted support for improved signage and wayfinding.</p>
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					Tom	
105	Tom O'Neill	Fernhill Resident	No	Support	<p>As someone who works in the Parks Space, I strongly support the intent of this RMP and praise staff for their work to date. There are five things I would like the QLDC to take into consideration:</p> <ol style="list-style-type: none"> <li>1. I would like to see continued support (not just fiscal) for the Queenstown Mountain Bike Club, and regular financial contributions/grants to the club to maintain the trails in the Wynyard Cres area. The MTB club is able to provide recreational benefits much more cost-effectively than the Council can do through its contractors making rate-payer spending more efficient, whilst improving recreational outcomes. These trails provide a fantastic recreational opportunity for Fernhill locals, which is utilised by a large portion of the community here.</li> <li>2. Please stop all helicopter landings in the vicinity of Bob's Peak and within a 10km radius of Ben Lomond in conjunction with DOC, and write this into the RMP and District Plan to bind the Council and operators. All aerial access needs to be stopped to protect the reserve, the environment and in respect for walkers. I understand that commercial operators have used this site since the 1970s, but times have changed and I believe it creates unnecessary noise and pollution in the vicinity of the residential/natural areas which should be stopped. This reduces the tranquillity of the area diminishing the value for other users. This also sets double standards if you are banning drones and other helicopter usage.</li> <li>3. Please limit all commercial operator expansion in the area to "low-impact operators who meaningfully improve the reserve" with all applications to be considered on a case-by-case basis by Council staff.</li> <li>4. Please consider or enable for a MTB linkage from Fernhill to Moke Lake off of the road to allow for increased recreational access for Fernhill locals. The existing trail network is only suitable for walkers which forces MTB riders onto the highway which is not safe with international drivers and frustrated locals.</li> <li>5. I would like to see the Council and DOC consider a vault toilet or at minimum signage on the Ben Lomond Trail. I found human defecation on the trail in December which was not buried.</li> </ol> <p>On a side note, I understand the reserve is not appropriate for hunting due to its proximity to town, but I would like to see how responsible locals or groups like the NZDA could potentially assist with goat control in the area as the numbers are stupidly high, and I imagine the control costs are too! This will not be helping with native bush restoration in the area either.</p>	<p>Noted support for mountain biking and the QTMBC.</p> <p>Noted support for restricting helicopter use in the reserve.</p> <p>Note support to prioritise low impact commercial activity.</p> <p>Noted support for toilets in Ben Lomond.</p> <p>Noted support for control of pest animal species.</p>
106	Vincent Willcock		Yes	Neutral	See attached pdf submission.	<p>Noted support for mountain biking.</p> <p>Noted support for expand mountain biking trail network in both reserves.</p> <p>Consider amendment to 8.2 to remove reference to "Unauthorised".</p> <p>Consider amendment to section 13.2 to add specific objectives and policies relating to mountain biking on Queenstown Hill.</p> <p>Noted opposition to removal wilding trees.</p>

**Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan – Rev B**

Thank you for the opportunity to submit on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the work that has gone into the draft document today and the community engagement that has occurred to date.

I am generally supportive of the objectives and policies of the DRAFT Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve (Draft Plan) as they relate to promoting and enhancing recreational facilities and access to the Reserves.

However, I am **strongly opposed** to the following specific parts of the Draft Plan. Further work is required to better align with the wishes of the community and improve outcomes for residents and visitors.

Below I provide specific commentary on selected parts the Draft Plan, referencing the relevant sections of the document. Text in italics is taken from the Draft Plan

**Section 8.2 – Description of Primary Users and Activities - Te Tapanui Queenstown Hill Reserve**

*Unauthorised mountain biking tracks have also been developed with the...*

Use of the word ‘unauthorised’ has specific legal meaning and context under the Reserves Act 1977 (the Act) that is different to what is inferred in the draft wording. The use of ‘unauthorised’ should be reconsidered.

The Draft Plan wording in Section 8 downplays (intentionally?) the existence and significance of the mountain bike trail (MTB) network inside the Queenstown Hill Reserve. The trails, as shown indicatively in the Strava ‘heat-map’ are well established with some having been in-place for 20+ years.

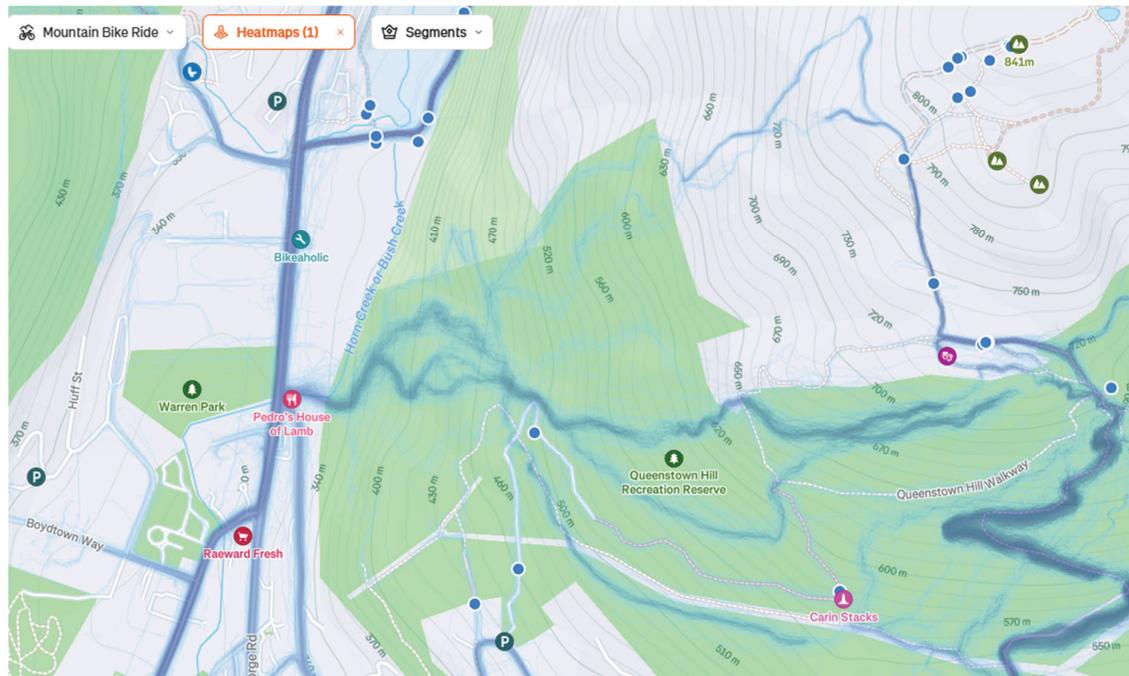


Figure 1: Mountain Bike Trails are shown by the blue lines. Darker lines indicate higher frequency of recorded use.

The trails are popular as Queenstown Hill Reserve forms one of three (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation) all year, all weather mountain biking areas accessible from Queenstown. The types of trails, natural features present and proximity to the CBD have made this mountain biking area internationally significant.

The Draft Plan wording needs to be amended to reflect the actual situation inside the Queenstown Hill Reserve and recognise that many Queenstown residents and international visitors use the trail network for their recreational enjoyment.

While acknowledging that these are 'unsanctioned' or 'unofficial' the Draft Plan should aim to work collaboratively with the MTB community to formalise them, where it is appropriate to do so. New objectives and policies that relate specifically to MTB trails on Queenstown Hill need to be incorporated in Section 13.2 of the Draft Plan. It is not appropriate to turn a blind-eye to the existing trail network solely because sufficient resources haven't been applied to addressing what is largely an issue of compliance.

These proposed changes would better align the Draft Plan with the current (2005) Reserve Management Plan - 11.1.1 (7) that provided for mountain bike trails on Queenstown Hill

- *To exclude mountain bike use within 200 metres of (and including) the Time Walk track and restrict mountain bike use to formed and approved trails.*

and align the Draft Plan with the Reserves classified use under The Act as a Recreation Reserve

- *for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside.*

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

The above wording suggests that removal of the exotic species in Ben Lomond is a certainty and only a matter of time before it happens. While I acknowledge that the Draft Plan has been guided by early engagement with the community, I don't believe the current wording accurately reflects the views of the wider community. Many in the community would be very surprised to hear the trees are to be removed. The significant community back-lash to the damage caused to the Queenstown Cemetery following forestry operations in Ben Lomond Reserve supports this view.

Further to this, the wording suggests that removal can be harmonious with maintaining a network of biking trails. This is simply **not the case** – the presence of biking trails in these reserves is inextricably linked to the established trees that protect them. The terrain is too steep and the soil profile too shallow to support trails without a dense, tree canopy. Without the trees many of these trails would disappear.

### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir*

This section hasn't been written with the qualifying statements (paraphrased) .... *That provide a staged approach... followed by a revegetation programme..* that are found in Section 14.3.2

What are the reasons for the urgency behind a forestry plan for Queenstown Hill, why does it not require the more holistic and balanced approach that the Draft Plan suggests Ben Lomond is to receive with its staged approach and revegetation? Many of the issues present on Ben Lomond Hill that warrant staging and revegetation are also present on Queenstown Hill.

As written, it suggests that removal of the wilding is paramount above all other community issues and concerns. Is this the case? Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve. That is now becoming overrun with Sycamore, Blackberry and other noxious weeds as there was (is) no plan to facilitate revegetation.

### **Section 14.6.9 - Biking & Walking Tracks**

*Remove and rehabilitate unauthorised tracks and trails*

The Draft Plan needs to reflect that many of Queenstown established mountain bike trails started life as unauthorised trails. Many of the best and most frequently used trails in the district are currently 'unauthorised'. There needs to be an amnesty to, where appropriate, allow established tracks to become part of the official track network and preserve a world-class mountain biking destination.

The MTB community is likely to be far more receptive to the conversion of some 'pirate' trails to official trails and the resulting loss of others than blanket removal of 'unauthorised' trails.

Similarly, community buy-in of 'due process' to seek approval prior to building trails will be much greater if the relationship between QLDC and the MTB community isn't sabotaged by an overly heavy-handed approach.

### **General Comments**

More generally the language of the Draft Plan leans heavily towards removal of wilding conifers at the expense of reserve users and other tangible benefits to the community. While there are undisputable negative aspects associated with exotic wilding species, they do provide significant recreational, social and economic benefits. These, which are outlined below, are not referred to in the Draft Plan. Perhaps intentionally to suit the narrative, but they need to form part of the holistic discussion about the future of these trees. The financial and non-financial costs associated with their removal needs to be understood and weighed against other

strategies such as funding ongoing wilding control management both inside and outside of the reserve.

- As referenced in the Draft Plan the Reserves are mostly, steep, geologically unstable hill-sides and the trees are doing a very economical and aesthetically pleasing job of tying the hillsides together, while protecting the communities below them from rockfall, debris and landslides. The cost associated with engineered rock-fall fences (14.3.18) to provide a similar level of protection to which the trees currently provide is likely to stretch into the tens of millions of dollars, as well as blight the landscape with man-made masses of steel cable and mesh fencing. Is this a cost the community needs to incur? Most would argue we cannot afford it. Either way it is not accounted for in the Draft Plan.
- Two generations of Queenstowners have only ever known Queenstown Hill and Ben Lomond Reserves to be covered by in trees. They are a fundamental part of the iconic backdrop to the town.
- Large parts of both Reserves are assumed to fall under the requirements of the Emissions Trading Scheme. Deforestation of pre-1990 forest is likely to incur costs that are not stated. Have these been calculated and accounted for?
- The economic benefits of mountain biking to the community are acknowledged in the Draft Management Plan – but there is no commentary or reflection upon the economic cost associated with removal of the wildings in the Reserves and or removal of MTB trails on Queenstown Hill.
- Recreation – the Draft Plan does a good job of acknowledging the recreational uses and benefits of the reserve. What it does not articulate, is that many of these benefits exist because of or at the least are enhanced by the established trees covering the Reserves
  - Protection from freeze-thaw cycles. The tree canopy protects the trail networks from the free-thaw cycle that would render most of the trails (walking and biking) unusable in winter months
  - Significantly reduces trail maintenance and damage from the environment. A relevant example being the Time Walk on Queenstown Hill – which has a smooth surface inside the tree canopy and a rutted out, water damaged surface for the upper portion outside of the forested area
  - Shading – the benefit that trees provide to shade tracks simply cannot be underestimated. Walking or biking trails on hot summer days is far more enjoyable in the shade of the forest
  - Transpiration and cooling effect of the forests
  - Much of the terrain within the Reserves is steep and rocky. It simply cannot support widespread trail networks without the trees managing soil moisture, preventing run-off, and binding the hillside together.
- The carbon sequestration of these forests is significant and measured in the tens of thousands of tonnes per year. As mature trees, their rate of sequestration is high (>25t/ha/yr) and even if the Reserves are re-planted, removal will result in large carbon emissions that will take decades to offset.
- The Otago Regional Council Pest Management Plan has wilding conifers in the Progressive Containment Programme. Complete eradication of wilding conifers is therefore not a requirement of regional (or national) management plans and provides the option to maintain selected areas of reserve in forest cover.

## Conclusion

Ultimately, as a long-term resident and frequent user of both Reserves, I would like the Draft Plan to have a more balanced approach. That acknowledges that our world class mountain bike network has grown, largely organically, inside these established forests as the forests are solely responsible for providing the environment that enables them to exist. Perhaps the best way to articulate this is by highlighting what MTB trails look like outside of forested areas.

- The only trail network of significance in our area that is not within an established forest, are those on the face of Coronet Peak. Which cannot be ridden for 6-8 months of the year due to the free-thaw cycle, require tens of thousands of dollars in maintenance each Spring to bring the trails up to a rideable standard, and can't be ridden in the wet. Without established forests, Queenstown would lose its year-round, all-weather attractiveness as a place to ride mountain bikes. The economic cost of this is likely measured in the tens of millions of dollars ([Bike visitor spend](#) is estimated by Benji Patterson to be \$210m or 50% of the ski visitor economy by 2026).

In simple terms - if the financial cost of containment of wilding spread from the 'seed-source' within Ben Lomond and Queenstown Hill Reserves is less than the tangible and intangible benefits of maintaining the trees, or selected parts of. What is the harm in keeping a few tens of hectares of established conifer forest amongst tens of thousands of hectares of sub-alpine tussock-land and regenerating bush within the Wakatipu?

Yours sincerely,

Andrew Blackford

### **Submission on the Future of Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves**

Thank you for the opportunity to provide feedback on the future management of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the effort that has gone into drafting this document and the community engagement undertaken so far.

I am generally supportive of the objectives and policies outlined in the Draft Plan, particularly those aimed at promoting and enhancing recreational facilities and access to the Reserves. However, I strongly oppose certain elements of the Draft Plan that require further revision to better align with community interests and improve outcomes for both residents and visitors.

Below, I provide specific commentary on selected sections of the Draft Plan, referencing relevant portions of the document. Text from the Draft Plan is shown in italics.

#### **Section 8.2 – Primary Users and Activities (Te Tapunui Queenstown Hill Reserve)**

*Unauthorised mountain biking tracks have also been developed with the...*

The term *unauthorised* has a specific legal meaning under the Reserves Act 1977 that does not align with its inferred usage in the Draft Plan. The use of this term should be reconsidered.

Furthermore, the Draft Plan downplays the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. Strava heat-map data shows well-established trails, some of which have existed for over 20 years.

#### **Key Points:**

- Queenstown Hill Reserve is one of three all-weather, all-year mountain biking areas accessible from Queenstown (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation).
- The unique trail characteristics and proximity to the CBD make this network internationally significant.
- The Draft Plan should acknowledge the current use of these trails by residents and visitors.
- While these trails may be considered *unsanctioned* or *unofficial*, the plan should work collaboratively with the MTB community to formalize them where appropriate.
- Section 13.2 should include new objectives and policies specific to MTB trails on Queenstown Hill.
- Ignoring the existing trail network due to a lack of compliance resources is not a sustainable approach.
- These updates would align the Draft Plan with the 2005 Reserve Management Plan, which provided for designated MTB trails.

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

This wording implies that the removal of exotic tree species in Ben Lomond is inevitable. While early community engagement has influenced the Draft Plan, I do not believe this wording accurately reflects the broader community's perspective.

Many residents are unaware that tree removal is being considered. The strong public backlash against the damage caused to Queenstown Cemetery following forestry operations in Ben Lomond Reserve indicates significant community concern.

Moreover, the assumption that bike trails can be preserved after tree removal is incorrect. The existing trails rely on tree cover to prevent erosion and maintain usability. Without this canopy:

- The terrain is too steep and the soil too shallow to sustain trails.
- The loss of trees would drastically impact the long-term viability of the biking network.

### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.*

This section lacks the qualifying statements found in Section 14.3.2, which propose a staged approach followed by a revegetation program.

#### **Concerns:**

- Why is urgent action needed for Queenstown Hill, while Ben Lomond is given a more balanced, staged approach?
- The Draft Plan prioritizes wilding removal over other significant community concerns.
- Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve.

### **Section 14.6.9 – Biking & Walking Tracks**

*Remove and rehabilitate unauthorised tracks and trails.*

Historically, many of Queenstown's best and most frequently used MTB trails began as *unauthorised* trails. The Draft Plan should:

- Provide an amnesty to incorporate well-established trails into the official network where appropriate.
- Foster collaboration with the MTB community to balance the need for compliance with preserving a world-class biking destination.
- Avoid a heavy-handed approach that could erode community trust and cooperation.

### **General Comments on Wilding Tree Removal**

The Draft Plan leans heavily towards wilding conifer removal, often at the expense of recreational users and broader community benefits. While wildings present ecological challenges, they also provide significant recreational, social, and economic value.

#### **Key considerations:**

- **Erosion and Geotechnical Stability:**

- These Reserves consist of steep, geologically unstable slopes.
- Trees provide natural stabilization, reducing the risk of landslides and rockfalls.
- Alternative mitigation measures, such as engineered rockfall fences, would be prohibitively expensive and visually intrusive.
- **Community Identity and Landscape Aesthetics:**
  - Two generations of Queenstown residents have known these Reserves as forested landscapes.
  - The removal of trees would significantly alter the town's iconic backdrop.
- **Carbon Sequestration and Economic Impacts:**
  - These forests sequester tens of thousands of tonnes of carbon annually.
  - Deforestation would result in significant carbon emissions, taking decades to offset even if revegetation occurs.
  - Some forest areas may fall under the Emissions Trading Scheme, incurring costs that are not accounted for in the Draft Plan.
- **Impact on Mountain Biking Tourism:**
  - The Draft Plan acknowledges the economic benefits of mountain biking but does not assess the financial impact of tree removal.
  - Without tree cover, trails will be subject to freeze-thaw cycles, rendering them unusable for much of the year.
  - The only significant local MTB network outside of established forests (Coronet Peak) requires costly annual maintenance and cannot be ridden in wet conditions.
  - By 2026, mountain biking is projected to generate \$210M annually—50% of the ski industry's value (Benji Patterson, economic analysis).
  - Tree removal would undermine Queenstown's reputation as a year-round mountain biking destination, with significant economic consequences.

## **Conclusion**

As a long-term resident and frequent user of these Reserves, I urge the Council to adopt a more balanced approach that recognizes the benefits of maintaining selected forested areas. Rather than pursuing complete eradication of wildings, the Draft Plan should evaluate the cost-benefit ratio of containment and selective management.

A pragmatic approach would preserve:

- The economic and recreational value of mountain biking.
- Environmental stability and trail sustainability.
- The town's iconic visual landscape.

- A carbon sequestration strategy that aligns with broader environmental goals.

If the cost of containing wilding spread is lower than the benefits these forests provide, then retaining a portion of established forest within the tens of thousands of hectares of surrounding sub-alpine tussock land is a logical and sustainable solution.

Yours sincerely,

Cassie Pineau

## 14. Connor Smith

**From:** Connor Smith

**Sent:** Monday, 17 March 2025 9:25 PM

**To:** Let's Talk <letstalk@qldc.govt.nz>

**Subject:** Please don't destroy our trails!

Hi , Please see my submission below Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort invested in developing the draft plan and acknowledge the community engagement undertaken so far. I generally support the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access. However, I have significant concerns regarding specific aspects that require further consideration to better align with community interests and ensure improved outcomes for residents and visitors. Below, I provide detailed feedback on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is quoted directly from the Draft Plan. Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve Unauthorised mountain biking tracks have also been developed

with the.... The term "unauthorised" has a specific legal implication under the Reserves Act 1977, which does not entirely align with its use here. I recommend reconsidering the wording for greater accuracy. Additionally, the Draft Plan underrepresents the significance of the mountain bike (MTB) trail network within Queenstown Hill Reserve. Strava heat maps show these trails have existed for over 20 years and are well-established. Queenstown Hill Reserve is one of only three all-season, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). Its natural features and proximity to the town center make it an internationally significant MTB destination. The Draft Plan should more accurately acknowledge the current use of the reserve by mountain bikers. While recognizing that these trails are 'unsanctioned' or 'unofficial,' the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be included in Section 13.2. Ignoring this established trail network due to resource limitations is not a viable long-term

strategy. This revision would align the Draft Plan with the existing (2005) Reserve Management Plan, which permitted mountain biking with restrictions near the Time Walk track and required MTB use to be limited to designated and approved trails. Additionally, this approach aligns with the reserve's classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities. Section 13.1.4 – Ben Lomond Bike Trails Consideration will have to be given to the bike trail network when the vegetation removal occurs. This phrasing implies that the removal of exotic species in Ben Lomond is inevitable. While community engagement has shaped the Draft Plan, the broader community may not fully support this assumption. The public backlash following damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve highlights strong community sentiment regarding tree removal. Additionally, assuming that bike trails will remain viable post-deforestation is problematic. Trail sustainability is closely tied to tree cover, which stabilizes steep terrain and maintains suitable soil conditions. The Draft Plan should acknowledge these challenges. Section 14.3.1 – Landscape Protection Forestry Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir. This section lacks the qualifying statements found in Section 14.3.2, which proposes a staged removal process followed by revegetation. Why is immediate action prioritized for the Queenstown Hill Forestry Plan without a similarly balanced approach? The plan must also consider the unintended consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, phased approach integrating revegetation efforts is necessary to prevent ecological and landscape degradation. Section 14.6.9 – Biking & Walking Tracks Remove and rehabilitate unauthorised tracks and trails. The Draft Plan does not acknowledge that many of Queenstown's most popular and well-used MTB trails began as 'unauthorised' tracks. Instead of a blanket removal policy, an amnesty should be considered to assess and integrate well-established trails into the official network where appropriate. A collaborative approach with the MTB community would encourage greater acceptance of formalizing certain trails while decommissioning others. A rigid stance risks alienating a key user group and undermining long-term compliance. General Comments The Draft Plan prioritizes wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced assessment is needed to weigh the financial and environmental costs of removal against alternative management strategies. Key considerations missing from the Draft Plan include: Slope Stability & Natural Hazard Mitigation: The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions, making them potentially unaffordable for the community. Historical and Aesthetic Value: Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown's identity.

Economic Considerations: While the Draft Plan acknowledges the economic benefits of mountain biking, it does not address the financial impact of removing MTB trails or forested

areas. Research estimates that MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism. Trail Sustainability & User Experience: Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown's appeal as a year-round MTB destination. Carbon Sequestration: These forests sequester tens of thousands of tonnes of carbon annually. Their removal would generate significant carbon emissions, taking decades to offset even with replanting efforts. Regulatory Flexibility: The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than full eradication. A managed retention strategy could be explored instead of wholesale removal. Conclusion As a long-term resident and frequent user of both reserves, I urge the Draft Plan to take a more balanced approach. Queenstown's world-class mountain biking network has thrived within these established forests because they provide an environment conducive to sustainable trails. A comparison of deforested MTB trails versus those within forested areas reinforces this point. The Coronet Peak trails, which exist outside a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses. If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.

Yours sincerely,  
Connor smith

## 18. Endeavour Electric

**From:** damon@endeavourelectric.co.nz

**Sent:** Monday, 17 March 2025 9:54 PM

**To:** Let's Talk <letstalk@qldc.govt.nz>

**Subject:** QT Hill Management Plan

### **the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan**

---

Thank you for the opportunity to submit on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the work that has gone into the draft document today and the community engagement that has occurred to date.

I am generally supportive of the objectives and policies of the DRAFT Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve (Draft Plan) as they relate to promoting and enhancing recreational facilities and access to the Reserves.

However, I am **strongly opposed** to the following specific parts of the Draft Plan. Further work is required to better align with the wishes of the community and improve outcomes for residents and visitors.

Below I provide specific commentary on selected parts the Draft Plan, referencing the relevant sections of the document. Text in italics is taken from the Draft Plan

#### **Section 8.2 – Description of Primary Users and Activities - Te Tapanui Queenstown Hill Reserve**

---

*Unauthorised mountain biking tracks have also been developed with the....*

---

Use of the word ‘unauthorised’ has specific legal meaning and context under the Reserves Act 1977 (the Act) that is different to what is inferred in the draft wording. The use of ‘unauthorised’ should be reconsidered.

The Draft Plan wording in Section 8 downplays (intentionally?) the existence and significance of the mountain bike trail (MTB) network inside the Queenstown Hill Reserve. The trails, as shown indicatively in the Strava ‘heat-map’ are well established with some having been in-place for 20+ years.

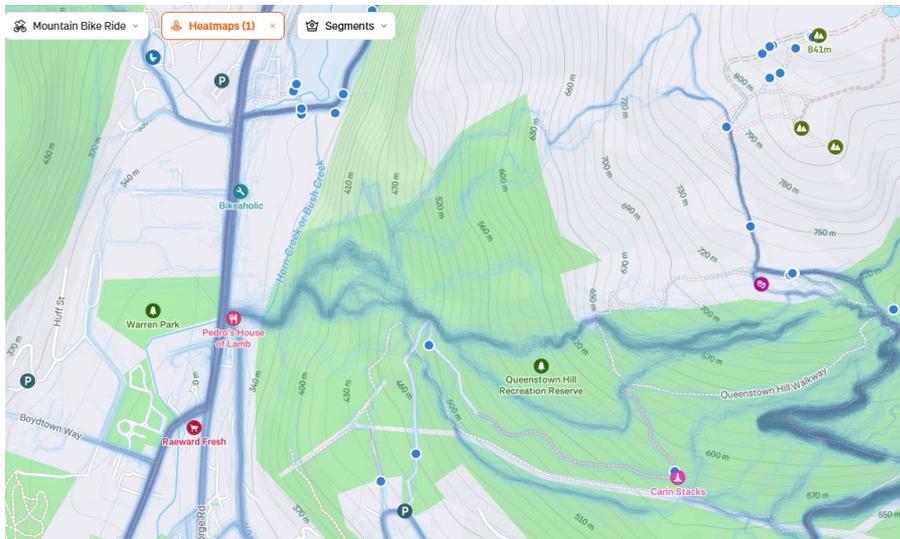


Figure 1: Mountain Bike Trails are shown by the blue lines. Darker lines indicate higher frequency of recorded use.

The trails are popular as Queenstown Hill Reserve forms one of three (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation) all weather mountain biking areas accessible from Queenstown. The types of trails, natural features present and proximity to the CBD have made this mountain biking area internationally significant. The Draft Plan wording needs to be amended to reflect the actual situation inside the Queenstown Hill Reserve and recognise that many Queenstown residents and international visitors use the trail network for their recreational enjoyment.

While acknowledging that these are 'unsanctioned' or 'unofficial' the Draft Plan should aim to work collaboratively with the MTB community to formalise them, where it is appropriate to do so. New objectives and policies that relate specifically to MTB trails on Queenstown Hill need to be incorporated in Section 13.2 of the Draft Plan. It is not appropriate to turn a blind-eye to the existing trail network solely because sufficient resources haven't been applied to addressing what is largely an issue of compliance.

These proposed changes would better align the Draft Plan with the current (2005) Reserve Management Plan - 11.1.1 (7) that provided for mountain bike trails on Queenstown Hill

*To exclude mountain bike use within 200 metres of (and including) the Time Walk track and restrict mountain bike use to formed and approved trails.*

and align the Draft Plan with the Reserves classified use under The Act as a Recreation Reserve

*for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on*

*outdoor recreational activities, including recreational tracks in the countryside.*

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

The above wording suggests that removal of the exotic species in Ben Lomond is a certainty and only a matter of time before it happens. While I acknowledge that the Draft Plan has been guided by early engagement with the community, I don't believe the current wording accurately reflects the views of the wider community. Many in the community would be very surprised to hear the trees are to be removed. The significant community back-lash to the damage caused to the Queenstown Cemetery following forestry operations in Ben Lomond Reserve supports this view.

Further to this, the wording suggests that removal can be harmonious with maintaining a network of biking trails. This is simply **not the case** – the presence of biking trails in these reserves is inextricably linked to the established trees that protect them. The terrain is too steep and the soil profile too shallow to support trails without a dense, tree canopy.

#### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir*

This section hasn't been written with the qualifying statements (paraphrased) .... *That provide a staged approach... followed by a revegetation programme..* that are found in Section 14.3.2

What are the reasons for the urgency behind a forestry plan for Queenstown Hill, why does it not require the more holistic and balanced approach that the Draft Plan suggests Ben Lomond is to receive with its staged approach and revegetation? Many of the issues present on Ben Lomond Hill that warrant staging and revegetation are also present on Queenstown Hill.

As written, it suggests that removal of the wilding is paramount above all other community issues and concerns. Is this the case? Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve. That is now becoming overrun with Sycamore, Blackberry and other noxious weeds as there was (is) no plan to facilitate revegetation.

#### **Section 14.6.9 - Biking & Walking Tracks**

*Remove and rehabilitate unauthorised tracks and trails*

The Draft Plan needs to reflect that many of Queenstown established mountain bike trails started life as unauthorised trails. Many of the best and most frequently used trails in the district are currently 'unauthorised'. There needs to

be an amnesty to, where appropriate, allow established tracks to become part of the official track network and preserve a world-class mountain biking destination.

The MTB community is likely to be far more receptive to the conversion of some 'pirate' trails to official trails and the resulting loss of others than blanket removal of 'unauthorised' trails.

Similarly, community buy-in of 'due process' to seek approval prior to building trails will be much greater if the relationship between QLDC and the MTB community isn't sabotaged by an overly heavy-handed approach.

### **General Comments**

More generally the language of the Draft Plan leans heavily towards removal of wilding conifers at the expense of reserve users and other tangible benefits to the community. While there are undisputable negative aspects associated with exotic wilding species, they do provide significant recreational, social and economic benefits. These, which are outlined below, are not referred to in the Draft Plan. Perhaps intentionally to suit the narrative, but they need to form part of the holistic discussion about the future of these trees. The financial and non-financial costs associated with their removal needs to be understood and weighed against other strategies such as funding ongoing wilding control management both inside and outside of the reserve.

As referenced in the Draft Plan the Reserves are mostly, steep, geologically unstable hill-sides and the trees are doing a very economical and aesthetically pleasing job of tying the hillsides together, while protecting the communities below them from rockfall, debris and landslides. The cost associated with engineered rock-fall fences (14.3.18) to provide a similar level of protection to which the trees currently provide is likely to stretch into the tens of millions of dollars, as well as blight the landscape with man-made masses of steel cable and mesh fencing. Is this a cost the community needs to incur? Most would argue we cannot afford it. Either way it is not accounted for in the Draft Plan.

Two generations of Queenstowner's have only ever known Queenstown Hill and Ben Lomond Reserves to be covered by in trees. They are a fundamental part of the iconic backdrop to the town.

Large parts of both Reserves are assumed to fall under the requirements of the Emissions Trading Scheme. Deforestation of pre-1990 forest is likely to incur costs that are not stated. Have these been calculated and accounted for?

The economic benefits of mountain biking to the community are acknowledged in the Draft Management Plan – but there is no commentary or reflection upon the economic cost associated with removal of the wildings in the Reserves and or removal of MTB trails on Queenstown Hill.

Recreation – the Draft Plan does a good job of acknowledging the recreational uses and benefits of the reserve. What it does not articulate, is that many of these benefits exist because of or at the least are enhanced by the established trees covering the Reserves

- Protection from freeze-thaw cycles. The tree canopy protects the trail networks from the free-thaw cycle that would render most of the trails (walking and biking) unusable in winter months
- Significantly reduces trail maintenance and damage from the environment. A relevant example being the Time Walk on Queenstown Hill – which has a smooth surface inside the tree canopy and a rutted out, water damaged surface for the upper portion outside of the forested area
- Shading – the benefit that trees provide to shade tracks simply cannot be underestimated. Walking or biking trails on hot summer days is far more enjoyable in the shade of the forest
- Transpiration and cooling effect of the forests
- Much of the terrain within the Reserves is steep and rocky. It simply cannot support widespread trail networks without the trees managing soil moisture, preventing run-off, and binding the hillside together.

The carbon sequestration of these forests is significant and measured in the tens of thousands of tonnes per year. As mature trees, their rate of sequestration is high(>25t/ha/yr) and even if the Reserves are re-planted, removal will result in large carbon emissions that will take decades to offset.

The Otago Regional Council Pest Management Plan has wilding conifers in the Progressive Containment Programme. Complete eradication of wilding conifers is therefore not a requirement of regional (or national) management plans and provides the option to maintain selected areas of reserve in forest cover.

### **Conclusion**

Ultimately, as a long-term resident and frequent user of both Reserves, I would like the Draft Plan to have a more balanced approach. That acknowledges that our world class mountain bike network has grown, largely organically, inside these established forests as the forests are solely responsible for providing the environment that enables them to exist. Perhaps the best way to articulate this is by highlighting what MTB trails look like outside of forested areas.

The only trail network of significance in our area that is not within an established forest, are those on the face of Coronet Peak. Which cannot be ridden for 6-8 months of the year due to the free-thaw cycle, require tens of

thousands of dollars in maintenance each Spring to bring the trails up to a rideable standard, and can't be ridden in the wet. Without established forests, Queenstown would lose its year-round, all-weather attractiveness as a place to ride mountain bikes. The economic cost of this is likely measured in the tens of millions of dollars ([Bike visitor spend](#) is estimated by Benji Patterson to be \$210m or 50% of the ski visitor economy by 2026).

In simple terms - if the financial cost of containment of wilding spread from the 'seed-source' within Ben Lomond and Queenstown Hill Reserves is less than the tangible and intangible benefits maintain the trees, or selected parts of, provide. What is the harm in keeping a few tens of hectares of established conifer forest amongst tens of thousands of hectares of sub-alpine tussock-land and regenerating bush within the Wakatipu?

Yours sincerely,

Endeavour Electric



**From:** Damon Commerer  
**Sent:** Monday, 17 March 2025 9:52 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** QT Hill Reserve Management Plan

## **the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan**

---

Thank you for the opportunity to submit on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the work that has gone into the draft document today and the community engagement that has occurred to date.

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However, I am **strongly opposed** to the following specific parts of the Draft Plan. Further work is required to better align with the wishes of the community and improve outcomes for residents and visitors.

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### **Section 8.2 – Description of Primary Users and Activities - Te Tapanui**

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#### **Queenstown Hill Reserve**

*Unauthorised mountain biking tracks have also been developed with the....*

Use of the word ‘unauthorised’ has specific legal meaning and context under the Reserves Act 1977 (the Act) that is different to what is inferred in the draft wording. The use of ‘unauthorised’ should be reconsidered.

The Draft Plan wording in Section 8 downplays (intentionally?) the existence and significance of the mountain bike trail (MTB) network inside the Queenstown Hill Reserve. The trails, as shown indicatively in the Strava ‘heat-map’ are well established with some having been in-place for 20+ years.

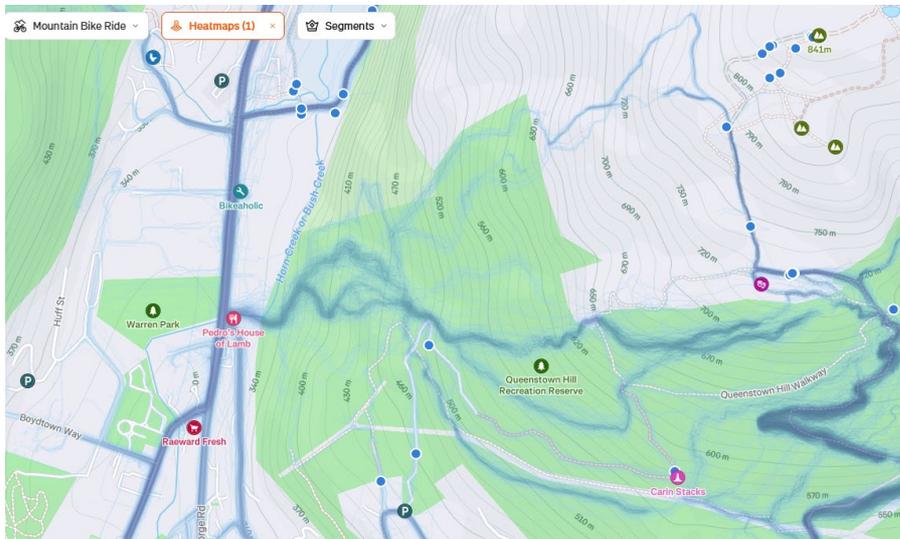


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While acknowledging that these are 'unsanctioned' or 'unofficial' the Draft Plan should aim to work collaboratively with the MTB community to formalise them, where it is appropriate to do so. New objectives and policies that relate specifically to MTB trails on Queenstown Hill need to be incorporated in Section 13.2 of the Draft Plan. It is not appropriate to turn a blind-eye to the existing trail network solely because sufficient resources haven't been applied to addressing what is largely an issue of compliance.

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*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

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Further to this, the wording suggests that removal can be harmonious with maintaining a network of biking trails. This is simply **not the case** – the presence of biking trails in these reserves is inextricably linked to the established trees that protect them. The terrain is too steep and the soil profile too shallow to support trails without a dense, tree canopy.

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### **General Comments**

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- As referenced in the Draft Plan the Reserves are mostly, steep, geologically unstable hill-sides and the trees are doing a very economical and aesthetically pleasing job of tying the hillsides together, while protecting the communities below them from rockfall, debris and landslides. The cost associated with engineered rock-fall fences (14.3.18) to provide a similar level of protection to which the trees currently provide is likely to stretch into the tens of millions of dollars, as well as blight the landscape with man-made masses of steel cable and mesh fencing. Is this a cost the community needs to incur? Most would argue we cannot afford it. Either way it is not accounted for in the Draft Plan.
- Two generations of Queenstowner's have only ever known Queenstown Hill and Ben Lomond Reserves to be covered by in trees. They are a fundamental part of the iconic backdrop to the town.
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  - Shading – the benefit that trees provide to shade tracks simply cannot be underestimated. Walking or biking trails on hot summer days is far more enjoyable in the shade of the forest
  - Transpiration and cooling effect of the forests
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- The carbon sequestration of these forests is significant and measured in the tens of thousands of tonnes per year. As mature trees, their rate of sequestration is high(>25t/ha/yr) and even if the Reserves are re-planted, removal will result in large carbon emissions that will take decades to offset.
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### **Conclusion**

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In simple terms - if the financial cost of containment of wilding spread from the 'seed-source' within Ben Lomond and Queenstown Hill Reserves is less than the tangible and intangible benefits maintain the trees, or selected parts of, provide. What is the harm in keeping a few tens of hectares of established conifer forest amongst tens of thousands of hectares of sub-alpine tussock-land and regenerating bush within the Wakatipu?

Yours sincerely,

Damon Commerer

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## 21. Daniel Milne

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**From:** daniel milne  
**Sent:** Monday, 17 March 2025 10:41 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Feed back on proposed planning

Hi,

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Please see my submission below regarding this plan submission.

Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve  
Management Plan Submission.

Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort that has gone into developing the draft plan and acknowledge the community engagement undertaken to date.

I am generally supportive of the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access to the Reserves. However, I have significant concerns regarding specific aspects of the Draft Plan that require further consideration to better align with community interests and ensure improved outcomes for both residents and visitors.

Below, I provide detailed commentary on selected sections of the Draft Plan, referencing

relevant excerpts from the document. Text in italics is taken directly from the Draft Plan.

## Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve

Unauthorised mountain biking tracks have also been developed with the....

The term “unauthorised” carries a specific legal connotation under the Reserves Act 1977 that does not fully align with its use in this context. The wording should be reconsidered to ensure clarity.

Additionally, the Draft Plan appears to downplay the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. These trails, as evidenced by Strava heat maps, have been in place for over 20 years and are well-established.

Queenstown Hill Reserve is one of only three all-year, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). The natural features and proximity to the town center make this MTB area internationally significant.

The Draft Plan should be updated to accurately reflect the current use of the Reserve by mountain bikers. While acknowledging that these trails are ‘unsanctioned’ or ‘unofficial,’ the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be incorporated into Section 13.2. Ignoring this well-established trail network due to resource constraints is not an acceptable long-term strategy.

Such revisions would align the Draft Plan with the existing (2005) Reserve Management Plan, which provided for mountain biking with restrictions near the Time Walk track and a requirement that MTB use be limited to formed and approved trails. Additionally, this approach would be consistent with the Reserve’s classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.

### Section 13.1.4 – Ben Lomond Bike Trails

Consideration will have to be given to the bike trail network when the vegetation removal occurs.

This wording suggests that the removal of exotic species in Ben Lomond is inevitable. While community engagement has guided the Draft Plan, the broader community may not fully support this assumption. The backlash following the damage to Queenstown Cemetery

due to forestry operations in Ben Lomond Reserve demonstrates strong community sentiment regarding tree removal.

Furthermore, the assumption that bike trails can be maintained post-deforestation is flawed. The presence of trails is intrinsically linked to the established tree cover, which stabilizes steep terrain and maintains suitable soil conditions for trail sustainability. The Draft Plan should acknowledge these challenges.

#### Section 14.3.1 – Landscape Protection Forestry

Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.

This section lacks the qualifying statements found in Section 14.3.2, which outline a staged approach followed by revegetation efforts. Why does the Queenstown Hill Forestry Plan require immediate action without a similarly balanced approach?

The plan must consider potential negative consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, staged approach that integrates revegetation efforts is necessary to avoid unintended ecological and landscape degradation.

#### Section 14.6.9 – Biking & Walking Tracks

Remove and rehabilitate unauthorised tracks and trails.

The Draft Plan fails to acknowledge that many of Queenstown's best and most frequently used MTB trails began as 'unauthorised' trails. Instead of blanket removal, an amnesty should be considered to incorporate well-established tracks into the official network where appropriate.

A collaborative approach with the MTB community would result in higher acceptance of formalizing some trails while decommissioning others. An overly rigid stance risks alienating a key user group and undermining compliance efforts.

#### General Comments

The Draft Plan leans heavily toward wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced discussion is required to assess the financial and environmental costs of removal against alternative management strategies.

Key considerations missing from the Draft Plan include:

**Slope Stability & Natural Hazard Mitigation:** The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions of dollars, which may be unaffordable for the community.

**Historical and Aesthetic Value:** Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown's identity.

**Economic Considerations:** The Draft Plan acknowledges the economic benefits of mountain biking but does not address the financial impact of removing MTB trails or forested areas. Research estimates MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism.

**Trail Sustainability & User Experience:** Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown's attractiveness as a year-round MTB destination.

**Carbon Sequestration:** These forests capture tens of thousands of tonnes of carbon annually. Removal would result in significant carbon emissions, taking decades to offset even with replanting efforts.

**Regulatory Flexibility:** The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than requiring full eradication. A managed retention strategy could be considered instead of wholesale removal.

Conclusion

As a long-term resident and frequent user of both reserves, I urge the Draft Plan to adopt a more balanced approach. Queenstown's world-class mountain biking network has flourished within these established forests because they provide an environment conducive to sustainable trails.

Comparing deforested MTB trails to forested ones highlights this point. The Coronet Peak trails, which exist outside of a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.

If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, then maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.

Yours sincerely,

Regards Daniel

## 28. Bowen Peak Limited

Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves Draft Reserve Management Plan 2024.

Submission by Bowen Peak Limited. 17 March 2025.

Bowen Peak Limited (BPL) supports the Early Insight Feedback with respect to many submissions, but particularly the importance of the close proximity of the One Mile Powerhouse Reserve to the Queenstown CBD town centre, noting the 15 minute 1,200m walk from the QLDC office/Queenstown CBD to the historic Powerhouse building itself, which is easy to access. This Powerhouse Reserve is a very peaceful and tranquil environment, with its beautiful clear stream and waterfalls, geology, ecology, scenery, native flora and fauna, wildlife habitats, natural values and diversity of landscapes by and rising from One Mile Creek.

BPL further supports the size of the much larger overall Ben Lomond Reserve, the available space for recreation opportunities, and enabling and maintaining public access to these areas without harming the natural environment for public enjoyment. Noting the limitation of available public QLDC & DoC funding, BPL also strongly advocates for the setting up of public private partnerships (PPP's) for the appropriate development of approved infrastructure within approved parts of the Ben Lomond Reserve area, noting the high importance of eradication of pests (both native bird predators and invasive exotic plant species like blackberry bushes and wilding pines).

BPL specifically affirms the Early Insight Feedback proposal for electric train access so that all individuals irrespective of their fitness, wealth, age or handicaps can go up to the upper parts of the reserve - specifically with the planned installation by BPL of two electric funicular railway systems as green, carbon neutral and quiet method of lifting over 1,000 people per hour up into this upper area.

More than simply making a submission to this Reserve Management Plan review, BPL has a current fast-track application currently before the New Zealand Government - BPL's Powerhouse Funicular Railway Queenstown Regional Development (PFRQRD). However, BPL specifically seeks the RMP Hearing Panel's review of BPL's fast-track application-directed comments below, noting the importance of the finalised RMP supporting hopefully all of BPL's specific planned infrastructure and activities as outlined below.

BPL also specifically invites the Hearing Panel members to make the aforementioned 15-minute 1,200m walk to the Powerhouse from the QLDC offices with BPL staff and its professional representatives so that the Hearing Panel can directly see for themselves the current problems and creative possibilities within the One Mile Powerhouse Reserve, and hear first-hand the plans that BPL has presented to the NZ Government for consideration. BPL is able to make this a maximum 45 minute total exercise (15 minute walk there, 15 minute discussion/presentation on site and 15 minute return walk back to the QLDC offices).

In summary, BPL's PFRQRD project is to develop two funicular railways ('Suburban' and 'Saddle' funiculars) with their combined lower station located in a planned new retail, hospitality and conferencing precinct ('the Powerhouse Precinct') by Lake Wakatipu (including a planned new Powerhouse International Convention Centre) strategically placed within the One Mile Powerhouse Reserve. The Suburban funicular is planned to provide access up to a new Queenstown residential suburb (Fernhill Heights) as well as recreation activities (principally mountain biking). The Saddle funicular is planned to also provide for recreation, sightseeing and conservation activities up to the Te-Taumata-o-Hakitekura Saddle, and also provide access up to a proposed new Bowen Peak snow park/mountain bike park via a proposed new Ben Lomond Predator-free Sanctuary.

Specifically, BPL's PFRQRD development includes:

1. Development within the One Mile Recreation Reserve to provide a mix of appropriate retail, hospitality and tourism offerings, along with a proposed new Powerhouse International Convention Centre (a new conference/function facility with 1,500 person auditorium for international conferences) and associated 500 car park building;
2. High density housing to facilitate 250 alpine chalets (each with four apartments) along with 20 transitional alpine chalets (each with two apartments between Fernhill and the proposed new suburb 'Fernhill Heights') over a 56-hectare privately owned property above Fernhill adjacent to the Ben Lomond Reserve. In total, these chalets will provide 1,040 housing units, with 5% committed to the Queenstown Lakes Community Housing Trust for affordable housing. Fee simple and unit title subdivision will provide the land tenure.
3. Two modern fully electric funicular railways, comprising:
  - a. the 'Suburban' funicular to connect the combined lower station in the Powerhouse Precinct below up to the Suburban upper station at the top of the proposed Fernhill Heights suburb (and new extended top of Wynyard DH mountain bike trail); and
  - b. the 'Saddle' funicular to connect the combined lower station in the Powerhouse precinct below up to the Saddle upper station just below the ridge line of the Te-Taumata-o-Haketikura Saddle, the proposed new Bowen Peak seasonal snow/mountain bike park, the upper Ben Lomond mountain bike trails, and proposed Ben Lomond Predator-free Sanctuary.
4. Seasonal snow/mountain bike park on Bowen Peak, serviced by a six-seater chairlift.
5. Upper station of the Saddle Funicular which is envisaged to include an engine room, bar/restaurant, retail, guest services for ski lifts, two 30-bed bunk rooms for outdoor education groups, public shelter, public toilets, a 4WD ambulance base and a 4WD emergency access road within the sanctuary is proposed.
6. Predator-free fencing within One Mile Recreation Reserve to create a new Powerhouse predator-free sanctuary covering 3 hectares for protected breeding sites for New Zealand native birds, along with a new Ben Lomond Predator-free Sanctuary

near the top of the One Mile Creek valley covering 180 hectares also for protected breeding sites.

7. Wilding pine removal and native planting within the One Mile Recreation Reserve.

8. Planned construction of a fibreglass boardwalk (walking trail) from the Powerhouse up to Midway Clearing along the One Mile Creek stream, waterfalls and rapids to safely reopen the start of the closed Ben Lomond One Mile Creek walkway (which is currently closed for safety reasons).

Detailed design work is ongoing and will be refined if Bowen Peak Limited's Fast-track referral application progresses to a substantive application.

As such, BPL makes the following 20 specific recommended RMP changes (all changes outlined in CAPITALS) for the RMP Hearing Panel to consider integrating into the final RMP:-

#### 1. Section 3 Mana Whenua

This section does not state that the seven papatipu rūnaka do not currently have a shared meeting place (or marae) within their shared Central Otago district. While the Hearing Panel may consider that this might be an irrelevant point to the wider community in terms of this RMP review, BPL considers that appropriate transport, commercial, tourism and cultural development should occur within the One Mile Powerhouse Reserve - and that this One Mile Powerhouse Reserve is also an appropriate location for a future cultural centre for Maori if the seven rūnaka wanted to jointly construct a marae within this reserve.

Hence, BPL recommends that Section 3 Mana Whenua start with the phrase “EVEN THOUGH NO MARAE CURRENTLY EXISTS IN CENTRAL OTAGO FOR THE SEVEN PAPTIPU RUNAKA, the rakatirataka ...”

#### 2. Section 5.1 Vegetation.

This description does not describe nor acknowledge how Douglas fir (a wilding pine) is dominating landscapes and destroying native vegetation beneath with its tall 500-1,500 year tree lifespan. Douglas fir is described in this section as “an aggressive wilding conifer species is the predominant vegetation” noting also that “Remnant mountain beech forest occupies some of the upper slopes and the sides of One Mile, Two Mile and Horne Creek. In the damp gullies and nearer the streambeds, the forest is more diverse with several native species present ...”. However, this description stops short of saying that the Douglas fir is currently suppressing and destroying these remnants of NZ native forest noting that this exotic dominance and suppression of NZ native flora will be largely complete over the next decade unless our current generation is first accurately informed and second empowered to stop this NZ native flora suppression. Action cannot occur to remedy this if this situation remains undescribed and largely unknown.

Hence, BPL recommends that Section 5.1 Vegetation be accurately amended as follows:-

Douglas fir, an aggressive TALL DOMINANT wilding conifer species WITH A 500 TO 1,500 YEAR LIFE SPAN HAS BECOME the predominant vegetation on the lower slopes of the reserve AND IS CURRENTLY SUPPRESSING AND DESTROYING THE UNDERLYING NZ NATIVE FLORA BENEATH THESE LARGE GROWING TREES. Above this, tussock grassland dominates with a narrow band of sub-alpine shrubland in places. Remnant mountain beech forest occupies some of the upper slopes and the sides of One Mile, Two Mile and Horne Creek. In the damp gullies and nearer the streambeds, the forest is more diverse with several native species present ALTHOUGH THESE ARE BEING RAPIDLY OVERTAKEN AND DESTROYED BY THE DOUGLAS FIR CANOPY ABOVE.

### 3. Section 5.1 Access

This section of the RMP excludes mentioning of the recent appropriate closure of the One Mile Creek Track between the Powerhouse and Midway Clearing due to safety reasons. There is significant slippage along the track in several places, making it unsafe for the public to walk on, hence this track closure means that the public remains unaware of the deteriorating state of this important walkway which is 'next door' to the Queenstown CBD. Furthermore, the public are therefore not able to see at first-hand how the conifers and blackberry are overtaking this track and suppressing the native NZ flora running alongside the beautiful clear One Mile Creek stream and waterfalls, and associated NZ native flora and fauna. Unless the closure of this track is accurately documented withing the RMP, then solutions (for example BPL's offer of a public-private partnership (PPP) construction of a fibreglass boardwalk to replace this deteriorated track to allow it to return to safe public utilisation) cannot be reasonably considered if the aforementioned problem is not made known to the public.

Hence, BPL recommends that the following paragraph be inserted into Section 5.1 Access as follows:

NOTE IS MADE OF THE RECENT APPROPRIATE CLOSURE OF THE ONE MILE CREEK WALKING TRACK FROM THE POWERHOUSE UP TO MIDWAY CLEARING DUE TO SAFETY CONCERNS ALONG THIS TRACK DUE TO EROSION AND TRACK SUBSIDENCE.

### 4. Section 5.1 Recreation

This list of Te-Taumata-o-Hakitekura Ben Lomond Reserve supported recreational and commercial activities excludes heli-skiing and heli-biking on Bowen Peak, although several commercial helicopter companies each year perform these activities. For example <https://www.therideguide.co.nz/service-page/bowen-peak>. Also watch <https://www.youtube.com/watch?v=Neqyv2q7kcY> for further confirmation of this. BPL considers that it is important that the RMP accurately reflects the current activities, so that when quiet green fully electric funiculars are proposed to enable 100% of the interested public (irrespective of income, ability, age or handicap) to access these

areas, then an accurate comparison can be made to the <1% of the public who can currently afford these noisy carbon-hungry helicopter operations.

Hence, BPL recommends that the list in Section 5. Recreation be accurately amended to include “HELI-SKIING AND HELI-BIKING ON BOWEN PEAK”

#### 5. Section 7.4 Wilding Conifers.

This section starts by saying that “Douglas fir is a wilding conifer which has gradually infested both reserves at the expense of native species and is now the predominant vegetation cover...” but this stops short of saying that the Douglas fir is actively suppressing and destroying these remnants of NZ native forest noting that this exotic dominance and suppression of NZ native flora will largely be complete over the next decade unless the current generation is accurately informed about this NZ native flora suppression (so that with this understanding we can act now to save and preserve this beautiful remnant native forest).

Hence, BPL recommends that the first paragraph of Section 7.4 Wilding Conifers be accurately amended to state:-

“Douglas fir is a wilding conifer which has gradually infested both reserves at the expense of native species and is now the predominant vegetation cover CURRENTLY OVERTAKING, SUPPRESSING AND DESTROYING THE NZ NATIVE FLORA BENEATH.”

#### 6. Section 8.1 Te-Taumata-o-Hakitekura Ben Lomond Reserve

This section of the RMP excludes mentioning of the recent appropriate closure of the One Mile Creek Track between the Powerhouse and Midway Clearing due to safety reasons. There is significant slippage along the track in several places, making it unsafe for the public to walk on, hence this track closure means that the public remains largely unaware of the deteriorating state of this important walkway which is ‘next door’ to the Queenstown CBD. Further, the public are therefore not able to see at first-hand how the conifers and blackberry are overtaking this track and suppressing the native NZ flora running alongside the beautiful clear One Mile Creek stream and waterfalls, fauna and flora. Unless this is accurately documented, then solutions (for example BPL’s offer to join a public-private partnership (PPP) construction of a fibreglass boardwalk to replace this deteriorated track to allow it to return to safe public utilisation) cannot be reasonably considered if the problem is not made known to the public.

Hence, BPL recommends that the following paragraph be inserted into Section 8.1 as follows:

NOTE IS MADE OF THE RECENT APPROPRIATE CLOSURE OF THE ONE MILE CREEK WALKING TRACK FROM THE POWERHOUSE UP TO MIDWAY CLEARING DUE TO SAFETY CONCERNS ALONG THIS TRACK DUE TO EROSION AND TRACK SUBSIDENCE.

## 7. Section 11 Planned Commercial Recreation Developments

Up until January 2025, the authors of this current RMP draft document had not been made aware of BPL's aspirations for the Ben Lomond Reserve, but since a formal January 2025 meeting occurred between BPL and QLDC representatives as part of the new Fast-track application process, BPL now requests that the RMP Hearing Panel consider adding the following seven items (as a new item Section 11.4 BOWEN PEAK LIMITED) as these seven items constitute and summarise BPL's plans for the Ben Lomond Reserve:-

“BOWEN PEAK LIMITED HAS A FAST-TRACK APPLICATION CURRENTLY BEFORE THE NEW ZEALAND GOVERNMENT WITH RESPECT TO BOWEN PEAK LIMITED'S POWERHOUSE FUNICULAR RAILWAY QUEENSTOWN REGIONAL DEVELOPMENT. THIS PROJECT IS TO DEVELOP TWO FUNICULAR RAILWAYS ('SUBURBAN' AND 'SADDLE' FUNICULARS) WITH THEIR COMBINED LOWER STATION LOCATED IN A PLANNED NEW RETAIL, HOSPITALITY AND CONFERENCING PRECINCT WITHIN THE ONE MILE POWERHOUSE RESERVE BY LAKE WAKATIPU (INCLUDING A PLANNED NEW POWERHOUSE INTERNATIONAL CONVENTION CENTRE). THE SUBURBAN FUNICULAR IS PLANNED TO PROVIDE ACCESS UP TO A NEW QUEENSTOWN RESIDENTIAL SUBURB (WITH THE NEW SUBURB PLANNED TO BE BUILT ON PRIVATE LAND ADJACENT TO THE BEN LOMOND RESERVE AS THE PROPOSED NEW 'FERNHILL HEIGHTS' SUBURB) AS WELL AS RECREATION ACTIVITIES (PRINCIPALLY MOUNTAIN BIKING). THE SADDLE FUNICULAR IS PLANNED TO ALSO PROVIDE FOR RECREATION, SIGHTSEEING AND CONSERVATION ACTIVITIES UP TO THE TE-TAUMATA-O-HAKITEKURA SADDLE, TO PROVIDE ACCESS UP TO A PLANNED NEW BOWEN PEAK SEASONAL SNOW PARK /MOUNTAIN BIKE PARK AND BEN LOMOND PREDATOR-FREE SANCTUARY.

SPECIFICALLY, THE PROJECT DEVELOPMENT INCLUDES:

1. DEVELOPMENT WITHIN ONE MILE POWERHOUSE RESERVE TO PROVIDE RETAIL, HOSPITALITY AND TOURISM OFFERINGS, ALONG WITH THE PROPOSED NEW POWERHOUSE INTERNATIONAL CONVENTION CENTRE (CONFERENCE/FUNCTION FACILITY WITH 1,500 PERSON AUDITORIUM FOR INTERNATIONAL CONFERENCES) AND ASSOCIATED CAR PARK BUILDING FOR 500 CAR PARKS;
2. TWO MODERN FUNICULAR RAILWAYS, COMPRISING:
  - A. THE 'SUBURBAN' FUNICULAR TO CONNECT THE COMBINED LOWER STATION IN THE POWERHOUSE PRECINCT BELOW UP TO THE SUBURBAN UPPER STATION AT THE TOP OF THE PROPOSED FERNHILL HEIGHTS SUBURB (AND TOP OF WYNYARD DH MOUNTAIN BIKE TRAIL); AND
  - B. THE 'SADDLE' FUNICULAR TO CONNECT THE COMBINED LOWER STATION IN THE POWERHOUSE PRECINCT BELOW UP TO THE SADDLE UPPER STATION JUST BELOW THE RIDGE LINE OF THE TE-TAUMATA-O-HAKETIKURA SADDLE, THE PROPOSED NEW BOWEN PEAK SEASONAL SNOW/MOUNTAIN BIKE PARK, THE UPPER BEN LOMOND MOUNTAIN BIKE TRAILS, AND PROPOSED FENCED BEN LOMOND PREDATOR-FREE SANCTUARY.

3. SEASONAL SNOW/MOUNTAIN BIKE PARK ON BOWEN PEAK, SERVICED BY A SIX-SEATER CHAIRLIFT.

4. UPPER STATION OF THE SADDLE FUNICULAR IS ENVISAGED TO INCLUDE AN ENGINE ROOM, BAR/RESTAURANT, RETAIL, GUEST SERVICES FOR SKI LIFTS, TWO 30-BED BUNK ROOMS FOR OUTDOOR EDUCATION GROUPS, PUBLIC SHELTER, PUBLIC TOILETS, A 4WD AMBULANCE BASE AND A 4WD EMERGENCY ACCESS ROAD UNDER THE FUNICULAR WITHIN THE SANCTUARY.

5. PREDATOR-FREE FENCING WITHIN ONE MILE RECREATION RESERVE TO CREATE A NEW POWERHOUSE PREDATOR-FREE SANCTUARY COVERING 3 HECTARES FOR PROTECTED BREEDING SITES FOR NEW ZEALAND NATIVE BIRDS, ALONG WITH A NEW BEN LOMOND PREDATOR-FREE SANCTUARY NEAR THE TOP OF THE ONE MILE CREEK VALLEY COVERING 180 HECTARES ALSO FOR PROTECTED BREEDING SITES.

6. WILDING PINE REMOVAL AND NATIVE PLANTING WITHIN THE ONE MILE RECREATION RESERVE.

7. PLANNED CONSTRUCTION OF A FIBREGLASS BOARDWALK (WALKING TRAIL) FROM THE POWERHOUSE UP TO MIDWAY CLEARING BESIDE THE ONE MILE CREEK STREAM, WATERFALLS AND RAPIDS TO SAFELY REOPEN THE START OF THIS BEN LOMOND ONE MILE CREEK WALKWAY (WHICH IS CURRENTLY CLOSED FOR SAFETY REASONS).

DETAILED DESIGN WORK IS ONGOING AND WILL BE REFINED IF BOWEN PEAK LIMITED'S REFERRAL APPLICATION PROGRESSES TO A SUBSTANTIVE APPLICATION."

#### 8. Section 12 Objectives

Based on the above, BPL would like the RMP Hearing Panel to consider adding the following objectives to the RMP List in Section 12:-

12.1 Add the following to the end of the current objective "... AND TO OFFER TO KĀI TAHU AND THEIR SEVEN PAPTIPU RŪNAKA THE OPPORTUNITY TO BUILD A MARAE WITHIN THE BEN LOMOND RESERVE.

12.18 TO SUPPORT POTENTIAL PUBLIC PRIVATE PARTNERSHIPS TO WORK TOGETHER TO ACHIEVE THE INSTALLATION OF TWO QUIET, FULLY ELECTRICALLY-POWERED MODERN FUNICULAR TRAINS FROM THE ONE MILE RECREATION RESERVE UP TO (1) THE TE-TAUMATA-O-HAKITEKURA SADDLE TO CONNECT WITH A MODERN NEW 6-SEATER CHAIRLIFT PLACED UP THE SOUTHERN FACE OF BOWEN PEAK; AND UP TO (2) A PROPOSED NEW RESIDENTIAL SUBDIVISION ON PRIVATE LAND ABOVE FERNHILL WITH APPROPRIATE INFRASTRUCTURE TO PROMOTE WIDER COMMUNITY ACCESS IRRESPECTIVE OF FITNESS, WEALTH, AGE & DISABILITY.

12.19 TO SUPPORT POTENTIAL PUBLIC PRIVATE PARTNERSHIPS TO COLLABORATE IN SETTING UP BOTH LARGE AND SMALL PREDATOR-FREE FENCED SANCTUARIES WITHIN THE BEN LOMOND RESERVE WITH THE AIM OF ALLOWING NZ NATIVE BIRDS

TO SAFELY BREED WITHOUT PREDATORS EATING THEIR YOUNG WITHIN THEIR OWN NESTS.

12.20 TO SUPPORT POTENTIAL PUBLIC PRIVATE PARTNERSHIPS TO COLLABORATE TO INSTALL MODERN NEW BOARDWALKS TO SAFELY REOPEN THE CURRENTLY CLOSED ONE MILE CREEK TRACK.

12.21 TO SUPPORT THE DEVELOPMENT OF A LARGE 1,500 PERSON AUDITORIUM WITHIN THE PROPOSED POWERHOUSE INTERNATIONAL CONFERENCE CENTRE, TOGETHER WITH THE PROPOSED ADJACENT MULTI-STOREY 500 CAR PARK BUILDING, BOTH AT THE GATEWAY TO THE BEN LOMOND ONE MILE RECREATION RESERVE ADJACENT TO QLDC'S PLANNED THIRD STAGE QUEENSTOWN ARTERIAL ROAD BYPASS; AND TO SUPPORT THE DEVELOPMENT OF A FINAL GONDOLA STATION ADJACENT TO THIS INFRASTRUCTURE AS THE NEW FINAL LEG OF A PLANNED QUEENSTOWN AIRPORT QUEENSTOWN CBD GONDOLA INSTALLATION.

9. Section 13.1 Te-Taumata-o-Haketikura Ben Lomond 13.1.1 Wynyard Crescent Entrance

BPL recommends the addition of the following clause to the end of Policy 13.1.1.2 to state "Enable the development of the reserve area off Wynyard Crescent to improve access to the Wynyard Bike Park and trail network AND FACILITATE THE PASSAGE OF BOWEN PEAK LIMITED'S PLANNED NEW SUBURBAN FUNICULAR RAILWAY ABOVE THIS ACCESS ENTRANCE."

10. Section 13.1 Te-Taumata-o-Haketikura Ben Lomond 13.1.3 Fernhill Loop Trail

BPL recommends the addition of the following clause within Policy 13.1.3.3 to now state "Ensure the Fernhill loop is maintained to the suitable standard INCLUDING THE CONSTRUCTION OF NEW BOARDWALKS WHERE REQUIRED AND FUNDED BY PUBLIC PRIVATE PARTNERSHIPS and recognised within the network of trails."

11. Section 13.1 Te-Taumata-o-Haketikura Ben Lomond 13.1.4 Ben Lomond Mountain Bike Trails

BPL recommend the addition of a new Policy 13.1.4.5 to state that "ENSURE THAT THE PROPOSED DEVELOPMENT OF FUNICULAR RAILWAYS AND PREDATOR-FREE FENCED SANCTUARIES ARE INTEGRATED SEAMLESSLY WITH CURRENT AND PROPOSED FURTHER MOUNTAIN BIKE TRAILS, INCLUDING ELEVATION OF THE PLANNED FUNICULAR RAILWAYS ABOVE MOUNTAIN BIKE TRAILS, AS WELL AS THE CONSTRUCTION OF APPROPRIATE DOUBLE GATE ENTRANCES TO BOTH FACILITATE CURRENT AND FUTURE MOUNTAIN BIKE TRAILS WHILE AT THE SAME TIME PROTECTING THE BREEDING OF THE PROPOSED PREDATOR-FREE FENCED SANCTUARY NZ NATIVE BIRD SANCTUARY RESIDENTS."

## 12. Section 13.1 Te-Taumata-o-Haketikura Ben Lomond 13.1.5 Midway Clearing

BPL recommends the addition of the following clause to Policy 13.1.5.3 so that this policy now states “Consider formalising section of track to the Ben Lomond summit formerly maintained by DOC above Midway Clearing NOTING THE PROPOSED REQUIREMENT FOR A NEW EMERGENCY FOUR WHEEL DRIVE AMBULANCE TRACK ALIGNED WITH THE PLANNED POWERHOUSE FUNICULAR RAILWAY FROM MIDWAY CLEARING UP TO THE TE-TAUMATA-O-HAKITEKURA SADDLE WHICH IS ENVISAGED TO BE BUILT BETWEEN THE CURRENT WALKING TRACK AND ONE MILE CREEK SO AS NOT TO DISTURB WALKERS.”

## 13. Section 13.1 Te-Taumata-o-Haketikura Ben Lomond 13.1.7 One Mile POWERHOUSE Reserve Entrance

Working with BPL’s local professional advisers, principally John Edmonds & Associates, Baxter Design and Benje Patterson | People and Places, a new concept sketch has been drafted proposing a re-design of the One Mile Powerhouse Reserve and entrance as attached and below.

SEE ATTACHMENT SEPARATELY EMAILED TO QLDC COUNCIL RESERVES MANAGER AS UNABLE TO UPLOAD IN THIS SUBMISSION FORMAT



This new design is currently being reviewed by the NZ Government as part of BPL's PFRQRD fast-track referral application. Specifically, this new concept sketch incorporates (clockwise from 12'o'clock):-

- a proposed new fenced predator-free sanctuary;
- the proposed Powerhouse International Conference Centre;
- the proposed adjacent multi-storey car park with 500 car parks;
- the proposed final gondola terminal from Queenstown Airport to Queenstown CBD;
- the proposed lower funicular railway station housing the start of both proposed suburban and saddle funiculars;
- the proposed pedestrian underpass beneath the proposed QLDC Stage 3 Queenstown arterial road bypass;
- the proposed hospitality/rooftop bar/café;
- a proposed additional fenced predator-free sanctuary;
- the proposed new boardwalk commencing beside the Powerhouse up to Midway Clearing;
- the proposed extension of the Wynyard DH downhill mountain bike track underneath the planned rising funicular railway tracks down to the start of both funicular railways.

It is important to note that the central part of this new design has no buildings on it (as it is road reserve) thus encouraging uninhibited free flow of pedestrian traffic between the lake frontage and the historic Powerhouse building itself beside the beautiful One Mile Creek and native NZ flora (after eradication of the exotic blackberry and wilding pines from within this precinct).

Hence, BPL recommends that Section 13.1.7 be largely re-written as follows:-

#### Section 13.1 Te-Taumata-o-Haketikura Ben Lomond 13.1.7 One Mile POWERHOUSE Reserve Entrance

Description: A current arrival area to the Te-Taumata-o-Hakitekura Ben Lomond reserve. The entrance is from the Fernhill roundabout, providing access to the historic One Mile POWERHOUSE and the One Mile Creek walking trail. The One Mile creek walking trail IS STILL TECHNICALLY A WALKING track through remnant beech forest and Douglas fir to the subalpine and alpine zones higher up in the Reserve. There has been water damage to the lower section of the track WITH APPROPRIATE RECENT CLOSURE DUE TO SAFETY CONCERNS.

#### Facilities:

- Car parking – currently APPROXIMATELY 20 SPACES BUT 500 SPACES PROPOSED IN A NEW PUBLIC PRIVATE PARTNERSHIP MULTI-STOREY CAR PARK BUILDING IMMEDIATELY ADJACENT TO QLDC'S PLANNED NEW QUEENSTOWN STAGE 3 ARTERIAL ROAD BYPASS.
- New Infrastructure -  
THE PROPOSED TWO NEW SMALL FENCED PREDATOR-FREE SANCTUARIES;  
THE PROPOSED POWERHOUSE INTERNATIONAL CONFERENCE CENTRE;

THE PROPOSED FINAL GONDOLA TERMINAL FROM QUEENSTOWN AIRPORT TO QUEENSTOWN CBD;  
THE PROPOSED LOWER FUNICULAR RAILWAY STATION HOUSING THE START OF BOTH PROPOSED SUBURBAN AND SADDLE FUNICULARS;  
THE PROPOSED PEDESTRIAN UNDERPASS BENEATH THE PROPOSED QLDC STAGE 3 QUEENSTOWN ARTERIAL ROAD BYPASS;  
THE PROPOSED HOSPITALITY/ROOFTOP BAR/CAFÉ;  
THE PROPOSED NEW BOARDWALK COMMENCING BESIDE THE POWERHOUSE UP TO MIDWAY CLEARING;  
THE PROPOSED EXTENSION OF THE WYNYARD DH DOWNHILL MOUNTAIN BIKE TRACK UNDERNEATH THE PLANNED RISING FUNICULAR RAILWAY TRACKS DOWN TO THE START OF BOTH FUNICULAR RAILWAYS.

- Signage

Total area: 6,000m<sup>2</sup> (including the access road and car park area)

Objective:

13.1.7.1 To ensure the One Mile CREEK ENTRANCE is recognised as a formal arrival area into Te-Taumata-o-Hakitekura Ben Lomond Reserve AND TO REDESIGN THIS ENTRANCE AREA TO APPROPRIATELY BALANCE THE COMPETING NEEDS OF ALL USERS OF THIS RESERVE, BUT PARTICULARLY THE PLANNED NEW POWERHOUSE FUNICULAR RAILWAYS LOWER STATION, THE 1,500 PERSON AUDITORIUM WITHIN THE PLANNED POWERHOUSE INTERNATIONAL CONFERENCE CENTRE AND ASSOCIATED INFRASTRUCTURE.

Policies:

13.1.7.2 Protect AND PROMOTE the One Mile POWERHOUSE Heritage values.

13.1.7.3 Consider installing public toilets, A HOSPITALITY/ROOFTOP BAR/CAFÉ, TWO FENCED PREDATOR-FREE SANCTUARIES AND PROTECT AND PROMOTE PEDESTRIAN AND BICYCLE TRAFFIC BETWEEN THE LAKE FRONTAGE AND THE HISTORIC POWERHOUSE BUILDING.

13.1.7.4 Consider upgrading the entrance road and carpark to cater for more vehicles WITH CONSIDERATION GIVEN TO THE DEVELOPMENT OF A PLANNED PUBLIC PRIVATE PARTNERSHIP MULTI-STOREY CAR PARK BUILDING FOR 500 VEHICLES ADJACENT TO QLDC'S PLANNED STAGE 3 ARTERIAL ROAD BYPASS.

13.1.7.5 NOT Support the development of a new dual use uphill-trail near One Mile CREEK to connect to the existing network, DUE TO POTENTIAL ACCIDENT AND INJURY OCCURRING FROM HIGH SPEED DOWNHILL MOUNTAIN BIKE TRAFFIC DESCENDING ON THE WYNYARD DH MOUNTAIN BIKE TRACK CONFLICTING WITH PEDESTRIAN TRAFFIC, HENCE SUPPORT THE PUBLIC PRIVATE PARTNERSHIP OF A NEW BOARDWALK ASCENDING FROM THE HISTORIC POWERHOUSE BUILDING SEPARATE TO AND ABOVE THE DESCENDING WYNYARD DH BIKE TRAIL.

13.1.7.6 SUPPORT A NEW PUBLIC PRIVATE PARTNERSHIP DEVELOPMENT TO REDESIGN THE ONE MILE POWERHOUSE RESERVE ALONG THE LINES OF THE ATTACHED POWERHOUSE PRECINCT CONCEPT SKETCH TO SPECIFICALLY DEVELOP TWO NEW FENCED PREDATOR-FREE SANCTUARIES, THE PROPOSED POWERHOUSE INTERNATIONAL CONFERENCE CENTRE AND ADJACENT MULTI-STOREY CAR PARK WITH 500 CAR PARKS, THE PROPOSED FINAL GONDOLA TERMINAL FROM QUEENSTOWN AIRPORT TO QUEENSTOWN CBD, THE PROPOSED LOWER FUNICULAR RAILWAY STATION HOUSING THE START OF BOTH PROPOSED SUBURBAN AND SADDLE FUNICULARS, A PROPOSED PEDESTRIAN UNDERPASS BENEATH THE PROPOSED QLDC STAGE 3 QUEENSTOWN ARTERIAL ROAD BYPASS, A HOSPITALITY/ROOFTOP BAR/CAFÉ, A FURTHER FENCED PREDATOR-FREE SANCTUARY, A NEW BOARDWALK COMMENCING BESIDE THE POWERHOUSE UP TO MIDWAY CLEARING AND AN EXTENSION OF THE WYNYARD DH DOWNHILL MOUNTAIN BIKE TRACK UNDERNEATH THE PLANNED RISING FUNICULAR RAILWAY TRACKS DOWN TO THE START OF BOTH FUNICULAR RAILWAYS YET FREEING UP THE CENTRAL AREA (ROAD RESERVE) THUS ENCOURAGING UNINHIBITED FREE FLOW OF PEDESTRIAN TRAFFIC BETWEEN THE LAKE FRONTAGE AND THE HISTORIC POWERHOUSE BUILDING ITSELF ALONGSIDE THE BEAUTIFUL ONE MILE CREEK AND NATIVE NZ FLORA (AFTER ERADICATION OF THE EXOTIC BLACKBERRY AND WILDING PINES FROM THIS PRECINCT).

#### 14. Section 14 Policies 14.1 Kāi Tahu Partnerships

BPL recommend the addition of a new policy 14.1.2.f. which states ‘SUPPORTING KĀI TAHU AND THEIR SEVEN PAPATIPU RŪNAKA BY PROVIDING THEM WITH THE OPPORTUNITY TO BUILD A MARAE AT THE ONE MILE POWERHOUSE RESERVE GATEWAY OF THE BEN LOMOND RESERVE.

#### 15. Section 14 Policies 14.3 Pest Management

BPL recommend the change of policy 14.3.9 to now state “Enabling pest animal control through THE ESTABLISHMENT OF NEW PUBLIC PRIVATE PARTNERSHIPS TO DESIGN, CONSTRUCT AND MANAGE BOTH SMALL AND LARGE FENCED PREDATOR-FREE SANCTUARIES WITHIN BEN LOMOND RESERVE AND ALSO supporting the work of volunteer trapping organisations.

#### 16. Section 14 Policies 14.5 Commercial Use

BPL recommend the change of policy 14.5.11 to now state “Prohibit motorised recreation activity on the reserves such as motorbikes and off-road vehicles that COMPROMISE safety, damage trails and impact on of the quiet enjoyment of the reserve, ALTHOUGH ALLOWING FOR APPROPRIATELY DESIGNED EMERGENCY ACCESS FOR FOUR WHEEL DRIVE AMBULANCE VEHICLES AS AND WHERE DEEMED TO BE REQUIRED.

BPL recommend the change of policy 14.5.14.f to now correctly state “that the agreement IS non-transferable.”

## 17. Section 14 Policies 14.5 Events

Due to the long-term desire from many within the Queenstown Community for the establishment of a large International Conference Centre (for example the inclusion of a large conference centre in the Lakeview Development Masterplan which was adopted by QLDC in 2013); and noting Queenstown's concentration of commercial accommodation available on the Lake Esplanade; as well as Queenstown's unique international position with direct flights to and from Melbourne, Sydney, Gold Coast and Brisbane; and accepting Benje Patterson | People and Places' economic assessment supporting BPL's incorporation of a new Powerhouse International Conference Centre within it's PFRQRD; BPL recommends the following clause addition to the Events Policies section:-

14.5.19.e TO ESTABLISH A NEW PUBLIC PRIVATE PARTNERSHIP TO RESULT IN THE DEVELOPMENT OF A LARGE 1,500 PERSON AUDITORIUM WITHIN A PROPOSED NEW POWERHOUSE INTERNATIONAL CONFERENCE CENTRE FOR WEEKLY EVENTS WITH AN ASSOCIATED MULTI-STOREY CAR PARK FOR 500 VEHICLES AT THE ONE MILE RECREATION RESERVE FERNHILL ROAD LAKE ESPLANADE ROUNDABOUT ENTRANCE TO THE BEN LOMOND RESERVE.

## 18. Section 14.6 Infrastructure and Reserve Development

BPL recommends the change in policy to Section 14.6.1 to now state "Consider the development of built structures, as necessary, to provide for the function and support of formal and informal recreation AND OTHER APPROVED activities on the reserves.

## 19. Section 14.6.12 Infrastructure and Reserve Development

BPL recommends the change in policy to Section 14.6.12 to now state "Provide opportunities for cultural integration of Kāi Tahu values throughout the reserves and particularly at the reserve entrances, TOGETHER WITH THE SPECIFIC OPPORTUNITY FOR KĀI TAHU AND THE SEVEN PAPATIPU RŪNAKA TO DESIGN AND CONSTRUCT A MEETING PLACE/MARAE AT THE ONE MILE RECREATION RESERVE FERNHILL ROAD LAKE ESPLANADE ROUNDABOUT ENTRANCE TO THE BEN LOMOND RESERVE.

## 20. Section 14.6.12 Infrastructure and Reserve Development

BPL recommends the change in policy to Section 14.6.13 to now state "Review car parking provision at reserve entrances to improve access to the reserves, AND SPECIFICALLY TO ESTABLISH A NEW PUBLIC PRIVATE PARTNERSHIP TO DEVELOP A NEW MULTI-STOREY CAR PARK FOR 500 VEHICLES AT THE FERNHILL ROAD LAKE ESPLANADE ROUNDABOUT ENTRANCE TO THE BEN LOMOND RESERVE.



**POWERHOUSE PRECINCT CONCEPT SKETCH**  
 PROPOSED POWERHOUSE FUNICULAR RAILWAYS QUEENSTOWN REGIONAL DEVELOPMENT  
 BOWEN PEAK LTD  
 REFERENCE SK04 - SCALE = 1:1000 AT A3 - 13 MAR 2025

Extent of QLDC Stage 3 Bypass Works

### **Submission on the Future of Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves**

Thank you for the opportunity to provide feedback on the future management of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the effort that has gone into drafting this document and the community engagement undertaken so far.

I am generally supportive of the objectives and policies outlined in the Draft Plan, particularly those aimed at promoting and enhancing recreational facilities and access to the Reserves. However, I strongly oppose certain elements of the Draft Plan that require further revision to better align with community interests and improve outcomes for both residents and visitors.

Below, I provide specific commentary on selected sections of the Draft Plan, referencing relevant portions of the document. Text from the Draft Plan is shown in italics.

#### **Section 8.2 – Primary Users and Activities (Te Tapunui Queenstown Hill Reserve)**

*Unauthorised mountain biking tracks have also been developed with the....*

The term *unauthorised* has a specific legal meaning under the Reserves Act 1977 that does not align with its inferred usage in the Draft Plan. The use of this term should be reconsidered.

Furthermore, the Draft Plan downplays the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. Strava heat-map data shows well-established trails, some of which have existed for over 20 years.

#### **Key Points:**

- Queenstown Hill Reserve is one of three all-weather, all-year mountain biking areas accessible from Queenstown (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation).
- The unique trail characteristics and proximity to the CBD make this network internationally significant.
- The Draft Plan should acknowledge the current use of these trails by residents and visitors.
- While these trails may be considered *unsanctioned* or *unofficial*, the plan should work collaboratively with the MTB community to formalize them where appropriate.
- Section 13.2 should include new objectives and policies specific to MTB trails on Queenstown Hill.
- Ignoring the existing trail network due to a lack of compliance resources is not a sustainable approach.
- These updates would align the Draft Plan with the 2005 Reserve Management Plan, which provided for designated MTB trails.

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

This wording implies that the removal of exotic tree species in Ben Lomond is inevitable. While early community engagement has influenced the Draft Plan, I do not believe this wording accurately reflects the broader community's perspective.

Many residents are unaware that tree removal is being considered. The strong public backlash against the damage caused to Queenstown Cemetery following forestry operations in Ben Lomond Reserve indicates significant community concern.

Moreover, the assumption that bike trails can be preserved after tree removal is incorrect. The existing trails rely on tree cover to prevent erosion and maintain usability. Without this canopy:

- The terrain is too steep and the soil too shallow to sustain trails.
- The loss of trees would drastically impact the long-term viability of the biking network.

### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.*

This section lacks the qualifying statements found in Section 14.3.2, which propose a staged approach followed by a revegetation program.

#### **Concerns:**

- Why is urgent action needed for Queenstown Hill, while Ben Lomond is given a more balanced, staged approach?
- The Draft Plan prioritizes wilding removal over other significant community concerns.
- Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve.

### **Section 14.6.9 – Biking & Walking Tracks**

*Remove and rehabilitate unauthorised tracks and trails.*

Historically, many of Queenstown's best and most frequently used MTB trails began as *unauthorised* trails. The Draft Plan should:

- Provide an amnesty to incorporate well-established trails into the official network where appropriate.
- Foster collaboration with the MTB community to balance the need for compliance with preserving a world-class biking destination.
- Avoid a heavy-handed approach that could erode community trust and cooperation.

### **General Comments on Wilding Tree Removal**

The Draft Plan leans heavily towards wilding conifer removal, often at the expense of recreational users and broader community benefits. While wildings present ecological challenges, they also provide significant recreational, social, and economic value.

#### **Key considerations:**

- **Erosion and Geotechnical Stability:**

- These Reserves consist of steep, geologically unstable slopes.
- Trees provide natural stabilization, reducing the risk of landslides and rockfalls.
- Alternative mitigation measures, such as engineered rockfall fences, would be prohibitively expensive and visually intrusive.
- **Community Identity and Landscape Aesthetics:**
  - Two generations of Queenstown residents have known these Reserves as forested landscapes.
  - The removal of trees would significantly alter the town’s iconic backdrop.
- **Carbon Sequestration and Economic Impacts:**
  - These forests sequester tens of thousands of tonnes of carbon annually.
  - Deforestation would result in significant carbon emissions, taking decades to offset even if revegetation occurs.
  - Some forest areas may fall under the Emissions Trading Scheme, incurring costs that are not accounted for in the Draft Plan.
- **Impact on Mountain Biking Tourism:**
  - The Draft Plan acknowledges the economic benefits of mountain biking but does not assess the financial impact of tree removal.
  - Without tree cover, trails will be subject to freeze-thaw cycles, rendering them unusable for much of the year.
  - The only significant local MTB network outside of established forests (Coronet Peak) requires costly annual maintenance and cannot be ridden in wet conditions.
  - By 2026, mountain biking is projected to generate \$210M annually—50% of the ski industry’s value (Benji Patterson, economic analysis).
  - Tree removal would undermine Queenstown’s reputation as a year-round mountain biking destination, with significant economic consequences.

## **Conclusion**

As a long-term resident and frequent user of these Reserves, I urge the Council to adopt a more balanced approach that recognizes the benefits of maintaining selected forested areas. Rather than pursuing complete eradication of wildings, the Draft Plan should evaluate the cost-benefit ratio of containment and selective management.

A pragmatic approach would preserve:

- The economic and recreational value of mountain biking.
- Environmental stability and trail sustainability.
- The town’s iconic visual landscape.

- A carbon sequestration strategy that aligns with broader environmental goals.

If the cost of containing wilding spread is lower than the benefits these forests provide, then retaining a portion of established forest within the tens of thousands of hectares of surrounding sub-alpine tussock land is a logical and sustainable solution.

Yours sincerely,

Harry Steer

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**From:** Hayden Lockhart

**Sent:** Monday, 17 March 2025 5:31 PM

**To:** Let's Talk <letstalk@qldc.govt.nz>

**Subject:** Submission on Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan

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To whom it may concern,

Please find my submission below regarding the proposed Reserve Management Plan.

### **Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui Queenstown Hill Reserve Management Plan Submission**

Thank you for the opportunity to provide feedback on the future of these reserves. I appreciate the work that has gone into preparing the draft plan and recognize the efforts made to engage with the community throughout this process.

Overall, I support many of the objectives and policies outlined in the Draft Plan, particularly those focused on improving recreational facilities and enhancing accessibility. However, there are key areas that require further consideration to ensure the best outcomes for both residents and visitors. My primary concerns relate to the way certain aspects of the plan address mountain biking, forest management, and environmental impact.

Below, I provide detailed feedback on specific sections of the Draft Plan, citing relevant excerpts. Text in italics is directly quoted from the document.

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### **Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve**

*"Unauthorised mountain biking tracks have also been developed with the...."*

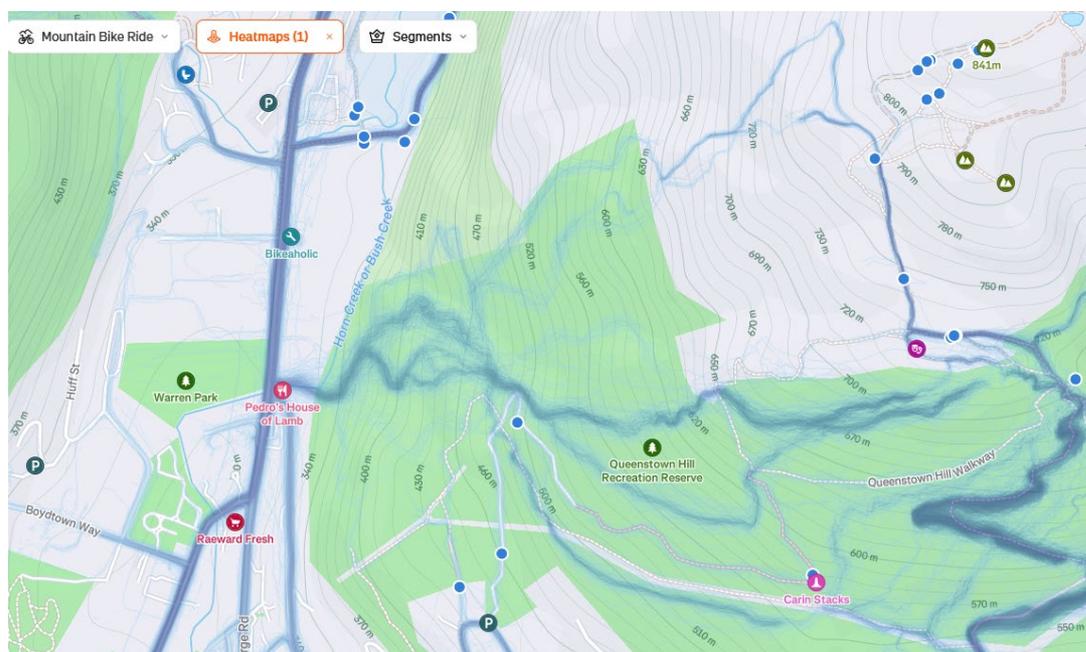
The term "**unauthorised**" has a distinct legal meaning under the Reserves Act 1977, and its use in this context may create unnecessary ambiguity. Rewording this phrase would improve clarity.

Additionally, the draft plan seems to understate the importance of the mountain biking trail

network within Queenstown Hill Reserve. Strava heat maps and historical use confirm that these trails have been in place for over two decades and are well-established.

Queenstown Hill is one of only three accessible, year-round mountain biking areas in Queenstown, alongside Ben Lomond Reserve and 7-Mile (which is currently being deforested). Given its natural terrain and proximity to town, it holds international significance as a mountain biking destination.

To better reflect actual usage, the Draft Plan should acknowledge these trails and explore a collaborative approach with the mountain biking community to formalize and manage them appropriately. Rather than dismissing them as ‘unsanctioned’ or ‘unofficial,’ the plan should introduce specific objectives and policies for their integration into the Reserve’s long-term vision. This would align with the 2005 Reserve Management Plan, which allowed for mountain biking with reasonable restrictions.



### Section 13.1.4 – Ben Lomond Bike Trails

*"Consideration will have to be given to the bike trail network when the vegetation removal occurs."*

This wording assumes that vegetation removal in Ben Lomond is a foregone conclusion. However, there remains considerable debate within the community about large-scale tree removal. The strong public reaction to the impact of forestry operations on Queenstown Cemetery highlights the need for greater discussion and transparency regarding deforestation plans.

Moreover, the assumption that bike trails will remain viable post-deforestation is flawed. Tree cover plays a crucial role in stabilizing steep terrain and maintaining soil conditions that support sustainable trails. Without it, trails will likely degrade, leading to increased erosion and higher maintenance demands. The plan should acknowledge these risks and

propose mitigation strategies.

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### **Section 14.3.1 – Landscape Protection Forestry**

*"Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir."*

Unlike Section 14.3.2, which outlines a staged approach and includes revegetation efforts, this section lacks any such balance. It is unclear why the Queenstown Hill Forestry Plan calls for immediate action without similar considerations.

Removing trees too quickly, without a structured transition plan, could lead to unintended negative consequences, including the rapid spread of other invasive species. A more strategic, staged approach that incorporates revegetation and erosion control measures should be prioritized.

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### **Section 14.6.9 – Biking & Walking Tracks**

*"Remove and rehabilitate unauthorised tracks and trails."*

Many of Queenstown's most popular and frequently used mountain biking trails began as 'unauthorised' tracks. Instead of outright removal, a more pragmatic approach would involve evaluating well-established trails for potential integration into the official network.

A collaborative process with the mountain biking community would foster greater acceptance of formalizing some trails while allowing for the decommissioning of others where necessary. A rigid, blanket-removal policy risks alienating a key user group and reducing overall compliance.

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### **General Comments**

The Draft Plan prioritizes wilding conifer removal but does not fully consider the broader recreational and community benefits that these forests provide. While controlling wilding pines is important, a more balanced discussion is needed to weigh the financial and environmental costs of removal against alternative management strategies.

Key concerns that should be addressed include:

- **Slope Stability & Hazard Mitigation** – The steep terrain relies on tree cover for stabilization, reducing the risk of rockfall and landslides. Large-scale deforestation could lead to significant erosion and require expensive mitigation measures.
- **Historical & Aesthetic Value** – Generations of Queenstown residents have only known these reserves as forested areas, making them an iconic part of the landscape.
- **Economic Impact** – The Draft Plan acknowledges mountain biking's economic benefits but does not assess the potential financial losses from trail closures or deforestation. Estimates suggest MTB visitor spending could reach \$210 million

annually by 2026, rivaling ski tourism.

- **Trail Sustainability** – Tree cover plays a key role in keeping trails rideable year-round. Deforested trails, like those at Coronet Peak, become unusable for months due to freeze-thaw cycles and excessive erosion.
  - **Carbon Sequestration** – These forests store significant amounts of carbon. Removing them would lead to high emissions, taking decades to offset even with replanting.
  - **Regulatory Flexibility** – The Otago Regional Council’s Pest Management Plan classifies wilding conifers under **progressive containment**, not mandatory eradication. A managed retention strategy should be considered.
- 

## Conclusion

As a long-term resident and regular user of these reserves, I encourage the Draft Plan to take a more balanced approach. Queenstown’s reputation as a premier year-round mountain biking destination is largely due to the presence of established forested trails.

Comparing deforested trails to those within forested areas highlights the risks—Coronet Peak trails, which lack tree cover, are unusable for much of the year due to weather conditions and erosion. Removing these forests would undermine the sustainability of Queenstown’s MTB network and result in significant economic consequences.

If the cost of managing wilding spread is lower than the economic and environmental value of retaining selected forested areas, maintaining these trees—while still managing their spread—should be a viable option.

I appreciate the opportunity to provide feedback and hope these points will be carefully considered. Continued planning to de-forest and remove mountain bike tracks will make me consider my decision to reside in Queenstown and is a backwards step for the region.

Regards,

Hayden

**From:** jake byrne  
**Sent:** Monday, 17 March 2025 6:42 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Queenstown hill logging

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Hi,

Please see my submission below regarding this plan submission.

**Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission.**

Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort that has gone into developing the draft plan and acknowledge the community engagement undertaken to date.

I am generally supportive of the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access to the Reserves. However, I have significant concerns regarding specific aspects of the Draft Plan that require further consideration to better align with community interests and ensure improved outcomes for both residents and visitors.

Below, I provide detailed commentary on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is taken directly from the Draft Plan.

**Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve**

*Unauthorised mountain biking tracks have also been developed with the....*

The term “unauthorised” carries a specific legal connotation under the Reserves Act 1977 that does not fully align with its use in this context. The wording should be reconsidered to ensure clarity.

Additionally, the Draft Plan appears to downplay the existence and significance of the

mountain bike trail (MTB) network within Queenstown Hill Reserve. These trails, as evidenced by Strava heat maps, have been in place for over 20 years and are well-established.

Queenstown Hill Reserve is one of only three all-year, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). The natural features and proximity to the town center make this MTB area internationally significant.

The Draft Plan should be updated to accurately reflect the current use of the Reserve by mountain bikers. While acknowledging that these trails are ‘unsanctioned’ or ‘unofficial,’ the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be incorporated into Section 13.2. Ignoring this well-established trail network due to resource constraints is not an acceptable long-term strategy.

Such revisions would align the Draft Plan with the existing (2005) Reserve Management Plan, which provided for mountain biking with restrictions near the Time Walk track and a requirement that MTB use be limited to formed and approved trails. Additionally, this approach would be consistent with the Reserve’s classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

This wording suggests that the removal of exotic species in Ben Lomond is inevitable. While community engagement has guided the Draft Plan, the broader community may not fully support this assumption. The backlash following the damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve demonstrates strong community sentiment regarding tree removal.

Furthermore, the assumption that bike trails can be maintained post-deforestation is flawed. The presence of trails is intrinsically linked to the established tree cover, which stabilizes steep terrain and maintains suitable soil conditions for trail sustainability. The Draft Plan should acknowledge these challenges.

#### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.*

This section lacks the qualifying statements found in Section 14.3.2, which outline a staged approach followed by revegetation efforts. Why does the Queenstown Hill Forestry Plan require immediate action without a similarly balanced approach?

The plan must consider potential negative consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, staged approach that integrates revegetation efforts is necessary to avoid unintended ecological and landscape degradation.

#### **Section 14.6.9 – Biking & Walking Tracks**

*Remove and rehabilitate unauthorised tracks and trails.*

The Draft Plan fails to acknowledge that many of Queenstown's best and most frequently used MTB trails began as 'unauthorised' trails. Instead of blanket removal, an amnesty should be considered to incorporate well-established tracks into the official network where appropriate.

A collaborative approach with the MTB community would result in higher acceptance of formalizing some trails while decommissioning others. An overly rigid stance risks alienating a key user group and undermining compliance efforts.

### **General Comments**

The Draft Plan leans heavily toward wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced discussion is required to assess the financial and environmental costs of removal against alternative management strategies.

Key considerations missing from the Draft Plan include:

- **Slope Stability & Natural Hazard Mitigation:** The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions of dollars, which may be unaffordable for the community.
- **Historical and Aesthetic Value:** Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown's identity.
- **Economic Considerations:** The Draft Plan acknowledges the economic benefits of mountain biking but does not address the financial impact of removing MTB trails or forested areas. Research estimates MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism.
- **Trail Sustainability & User Experience:** Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown's attractiveness as a year-round MTB destination.
- **Carbon Sequestration:** These forests capture tens of thousands of tonnes of carbon annually. Removal would result in significant carbon emissions, taking decades to offset even with replanting efforts.
- **Regulatory Flexibility:** The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than requiring full eradication. A managed retention strategy could be considered instead of wholesale removal.

### **Conclusion**

As a long-term resident and frequent user of both reserves, I urge the Draft Plan to adopt a more balanced approach. Queenstown's world-class mountain biking network has flourished within these established forests because they provide an environment conducive to sustainable trails.

Comparing deforested MTB trails to forested ones highlights this point. The Coronet Peak

trails, which exist outside of a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.

If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, then maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.

Yours sincerely,

Jake Byrne

## 41. Heritage New Zealand



HERITAGE NEW ZEALAND  
POUHERE TAONGA

17 March 2025

Queenstown Lakes District Council  
Private Bag 50072  
Queenstown  
9348

Email: [services@qldc.govt.nz](mailto:services@qldc.govt.nz)

Tēnā koe,

### **SUBMISSION FROM HERITAGE NEW ZEALAND POUHERE TAONGA ON THE TE-TAUMATA-O-HAKITEKURA BEN LOMOND AND TE TAPUNI QUEENSTOWN HILLS RESERVE MANAGEMENT PLAN CONSULTATION**

**To:** Queenstown Lakes District Council  
**From:** Heritage New Zealand Pouhere Taonga (HNZPT)

1. Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historic heritage.

#### **This is a submission on the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapuni Queenstown Hill Reserve Management Plan.**

2. HNZPT recognises that this is consultation of a Reserve Management Plan for Te-Taumata-o-Hakitekura Ben Lomond and Te Tapuni Queenstown Hill Reserves (the reserves). HNZPT's submission relates to the historic heritage-related aspects of the document, including cultural history and archaeology.

#### Historic Heritage in Te-Taumata-o-Hakitekura Ben Lomond and Te Tapuni Queenstown Hill Reserves

3. Heritage provides invaluable intergenerational connection, linking us with our tīpuna and with our future descendants. Through heritage, previous generations are seen, understood, and closer to being known. Heritage places and their stories also help to build understanding between people, contributing to strong communities and social cohesion. While there are currently no places or areas within the reserves entered on the New Zealand Heritage List/Rārangi Kōrero (the List), there is one recorded archaeological site recorded within the reserves.

4. The Reserves Management Plan will assist with decision making at all stages of use, management, and development of the reserves. The Management Plan consolidates the reserves' significant history for wider Queenstown Lakes Area, community aspirations, ecological values and recreational opportunities into a document for use by its stakeholders. The retention, maintenance and enhancement of any heritage structures or areas, within the reserves has been included in the management objectives and policies. HNZPT is satisfied that the Reserves Management Plan gives effect to section 6 of the Resource Management Act 1991.

#### Archaeological Provisions and Obligations in the HNZPTA

5. HNZPT reminds Council of the archaeological provisions of the HNZPTA and the regulatory framework that governs any activity that may modify or destroy an archaeological site.
6. Under the HNZPTA an Archaeological Authority must be obtained from HNZPT prior to any works that may modify or destroy any archaeological site, whether the site is unrecorded or has been previously recorded. An archaeological site is defined in section 6 of the HNZPTA as:
  - (a) *any place in New Zealand, including any building or structure (or part of a building or structure), that:*
    - i. *is associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and*
    - ii. *provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and*
  - (b) *includes a site for which a declaration is made under section 43(1).*
7. There is also potential to encounter subsurface archaeological features associated with the historic occupation, regardless of whether any part of these structures remain above ground. The potential for encountering archaeology increases where there has been human occupation pre 1900 nearby.
8. It is an offence to modify or destroy an archaeological site without an authority from HNZPT under the HNZPTA. Therefore, it is important to make owners aware of this obligation.

#### **HNZPT recommends the following is taken into account at all stages of the drafting of the Te-Taumata-o-Haikitekra Ben Lomond and Te Tapuni Queenstown Hill Reserves Management Plan**

##### Management of Archaeology

9. The pre-1900 evidence of occupation of the reserves is vast and related to all functions of life and development by early settlers of the Queenstown area. Therefore, there is potential for unrecorded archaeological sites to be discovered. Potential sites are recorded in historic survey maps which notes a water race connected to Bush Creek within Bobs Creek recreation reserve and pre-1900 pipelines within the Wynyard Jump Park. These sites are known to be pre-1900 which brings them into the archaeological regulatory role that HNZPT holds which is separate to the RMA functions that TLA regulate. HNZPT recommends adding an advice note to section 4 noting "Under the Heritage New Zealand Pouhere Taonga Act 2014, archaeological sites are

defined as any place occupied prior to 1900 that may provide archaeological information on the history of New Zealand. Due to the long history of people using and traversing the reserve, there are recorded and unrecorded archaeological sites across the landscape.”. HNZPT suggests adding a sentence “Protection and management of archaeological sites are regulated by HNZPT under HNZPTA 2014. The permission of HNZPT must be sought prior to the modification, damage or destruction of any archaeological site, whether the site is unrecorded or has been previously recorded.”

10. In total there is one archaeological site identified on the New Zealand Archaeological Association Archaeological Site Recording Scheme (ArchSite), across the reserves. The site is recorded within the Ben Lamond Reserve, which records a hut site (E41/204). Due to the wide distribution and nature of occupation of the reserves, there is reasonable risk of any earthworks, including soil disturbance, encountering unknown archaeology. As stated above, any development may trigger requirements under the archaeological provisions of the HNZPTA and may require an archaeological authority to be obtained.
11. Additionally, HNZPT recommends adding a note in section 9.0 noting “Protection and management of archaeological sites are regulated by Heritage New Zealand Pouhere Taonga under the Heritage New Zealand Pouhere Taonga Act 2014. The permission of Heritage New Zealand Pouhere Taonga must be sought prior to the modification, damage or destruction of any archaeological site, whether the site is unrecorded or has been previously recorded. Any earthworks may impact an archaeological site, including earthworks for building construction, earthworks for drainage, path formation, fencing installation, planting, and vegetation clearance. For more information, contact the Heritage New Zealand Pouhere Taonga Otago/Southland Office.”.
12. HNZPT recommends avoidance of potential archaeological features and mitigation of adverse effects to any archaeological sites wherever possible. An archaeological management plan will allow archaeology to be considered and integrated into development proposals rather than dealt with in isolation from other matters and reduces the potential for encountering unidentified archaeology and having to stop works until an archaeological authority is obtained.

#### Heritage Interpretation

13. HNZPT commends Council for the proposed implementation and maintenance of interpretation panels within the reserves. The enhancement of community awareness of the reserves’ history should be included as a strategic outcome of the Management Plan. Heritage interpretation needs to go beyond simple wayfinding. The interpretation panels should be developed by a suitably qualified and experienced practitioner and include the breadth of stories which form the history of the site and preferably be developed in consultation with HNZPT and rūnanga.
14. HNZPT invites QLDC staff to consult directly with HNZPT staff on how we can better provide for the protection and conservation of historic heritage, including management of archaeology,

through the Reserves Management Plan through initial consultation and the implementation of the Management Plan.

Ngā mihi

A handwritten signature in black ink, appearing to read 'Sarah Gallagher', with a large, stylized flourish at the end.

**Sarah Gallagher**  
**Area Manager, Otago & Southland**

Address for Service:  
James Sutherland – Planner Otago & Southland  
Heritage New Zealand Pouhere Taonga  
PO Box 5467  
Dunedin 9058  
Email: [jsutherland@heritage.org.nz](mailto:jsutherland@heritage.org.nz)

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**From:** Joe - QLPM  
**Sent:** Monday, 17 March 2025 11:02 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Queenstown Hill Reserve Management Plan

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## **The Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown**

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### **Hill Reserve Management Plan**

Thank you for the opportunity to submit on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the work that has gone into the draft document today and the community engagement that has occurred to date.

I am generally supportive of the objectives and policies of the DRAFT Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve (Draft Plan) as they relate to promoting and enhancing recreational facilities and access to the Reserves.

However, I am **strongly opposed** to the following specific parts of the Draft Plan. Further work is required to better align with the wishes of the community and improve outcomes for residents and visitors.

Below I provide specific commentary on selected parts the Draft Plan, referencing the relevant sections of the document. Text in italics is taken from the Draft Plan

### **Section 8.2 – Description of Primary Users and Activities - Te Tapanui**

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#### **Queenstown Hill Reserve**

*Unauthorised mountain biking tracks have also been developed with the....*

Use of the word ‘unauthorised’ has specific legal meaning and context under the Reserves Act 1977 (the Act) that is different to what is inferred in the draft wording. The use of ‘unauthorised’ should be reconsidered.

The Draft Plan wording in Section 8 downplays (intentionally?) the existence and significance of the mountain bike trail (MTB) network inside the Queenstown Hill Reserve. The trails, as shown indicatively in the Strava ‘heat-map’ are well established with some having been in-place for 20+ years.

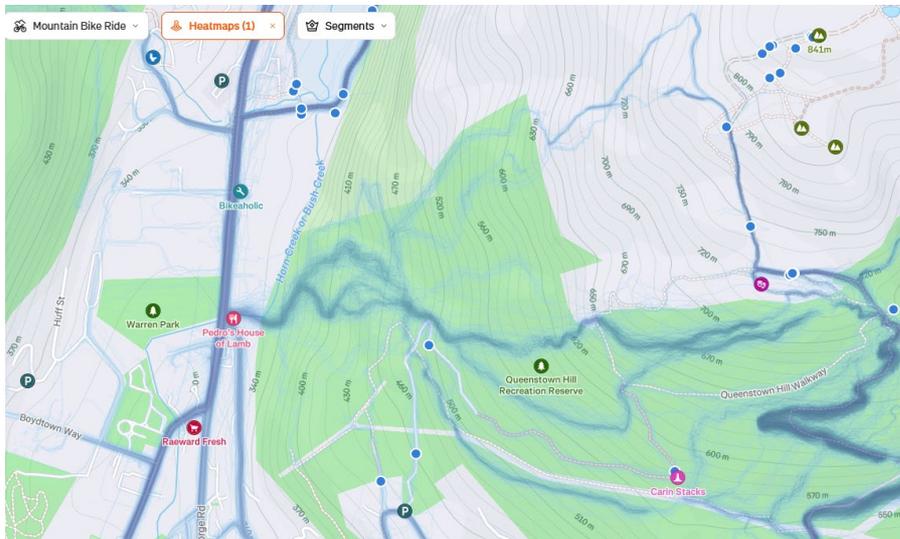


Figure 1: Mountain Bike Trails are shown by the blue lines. Darker lines indicate higher frequency of recorded use.

The trails are popular as Queenstown Hill Reserve forms one of three (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation) all weather mountain biking areas accessible from Queenstown. The types of trails, natural features present and proximity to the CBD have made this mountain biking area internationally significant. The Draft Plan wording needs to be amended to reflect the actual situation inside the Queenstown Hill Reserve and recognise that many Queenstown residents and international visitors use the trail network for their recreational enjoyment.

While acknowledging that these are 'unsanctioned' or 'unofficial' the Draft Plan should aim to work collaboratively with the MTB community to formalise them, where it is appropriate to do so. New objectives and policies that relate specifically to MTB trails on Queenstown Hill need to be incorporated in Section 13.2 of the Draft Plan. It is not appropriate to turn a blind-eye to the existing trail network solely because sufficient resources haven't been applied to addressing what is largely an issue of compliance.

These proposed changes would better align the Draft Plan with the current (2005) Reserve Management Plan - 11.1.1 (7) that provided for mountain bike trails on Queenstown Hill

- *To exclude mountain bike use within 200 metres of (and including) the Time Walk track and restrict mountain bike use to formed and approved trails.*

and align the Draft Plan with the Reserves classified use under The Act as a Recreation Reserve

- *for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on*

*outdoor recreational activities, including recreational tracks in the countryside.*

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

The above wording suggests that removal of the exotic species in Ben Lomond is a certainty and only a matter of time before it happens. While I acknowledge that the Draft Plan has been guided by early engagement with the community, I don't believe the current wording accurately reflects the views of the wider community. Many in the community would be very surprised to hear the trees are to be removed. The significant community back-lash to the damage caused to the Queenstown Cemetery following forestry operations in Ben Lomond Reserve supports this view.

Further to this, the wording suggests that removal can be harmonious with maintaining a network of biking trails. This is simply **not the case** – the presence of biking trails in these reserves is inextricably linked to the established trees that protect them. The terrain is too steep and the soil profile too shallow to support trails without a dense, tree canopy.

#### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir*

This section hasn't been written with the qualifying statements (paraphrased) .... *That provide a staged approach... followed by a revegetation programme..* that are found in Section 14.3.2

What are the reasons for the urgency behind a forestry plan for Queenstown Hill, why does it not require the more holistic and balanced approach that the Draft Plan suggests Ben Lomond is to receive with its staged approach and revegetation? Many of the issues present on Ben Lomond Hill that warrant staging and revegetation are also present on Queenstown Hill.

As written, it suggests that removal of the wilding is paramount above all other community issues and concerns. Is this the case? Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve. That is now becoming overrun with Sycamore, Blackberry and other noxious weeds as there was (is) no plan to facilitate revegetation.

#### **Section 14.6.9 - Biking & Walking Tracks**

*Remove and rehabilitate unauthorised tracks and trails*

The Draft Plan needs to reflect that many of Queenstown established mountain bike trails started life as unauthorised trails. Many of the best and most frequently used trails in the district are currently 'unauthorised'. There needs to

be an amnesty to, where appropriate, allow established tracks to become part of the official track network and preserve a world-class mountain biking destination.

The MTB community is likely to be far more receptive to the conversion of some 'pirate' trails to official trails and the resulting loss of others than blanket removal of 'unauthorised' trails.

Similarly, community buy-in of 'due process' to seek approval prior to building trails will be much greater if the relationship between QLDC and the MTB community isn't sabotaged by an overly heavy-handed approach.

### **General Comments**

More generally the language of the Draft Plan leans heavily towards removal of wilding conifers at the expense of reserve users and other tangible benefits to the community. While there are undisputable negative aspects associated with exotic wilding species, they do provide significant recreational, social and economic benefits. These, which are outlined below, are not referred to in the Draft Plan. Perhaps intentionally to suit the narrative, but they need to form part of the holistic discussion about the future of these trees. The financial and non-financial costs associated with their removal needs to be understood and weighed against other strategies such as funding ongoing wilding control management both inside and outside of the reserve.

- As referenced in the Draft Plan the Reserves are mostly, steep, geologically unstable hill-sides and the trees are doing a very economical and aesthetically pleasing job of tying the hillsides together, while protecting the communities below them from rockfall, debris and landslides. The cost associated with engineered rock-fall fences (14.3.18) to provide a similar level of protection to which the trees currently provide is likely to stretch into the tens of millions of dollars, as well as blight the landscape with man-made masses of steel cable and mesh fencing. Is this a cost the community needs to incur? Most would argue we cannot afford it. Either way it is not accounted for in the Draft Plan.
- Two generations of Queenstowner's have only ever known Queenstown Hill and Ben Lomond Reserves to be covered by in trees. They are a fundamental part of the iconic backdrop to the town.
- Large parts of both Reserves are assumed to fall under the requirements of the Emissions Trading Scheme. Deforestation of pre-1990 forest is likely to incur costs that are not stated. Have these been calculated and accounted for?
- The economic benefits of mountain biking to the community are acknowledged in the Draft Management Plan – but there is no commentary or reflection upon the economic cost associated with removal of the wildings in the Reserves and or removal of MTB trails on Queenstown Hill.

- Recreation – the Draft Plan does a good job of acknowledging the recreational uses and benefits of the reserve. What it does not articulate, is that many of these benefits exist because of or at the least are enhanced by the established trees covering the Reserves
  - Protection from freeze-thaw cycles. The tree canopy protects the trail networks from the free-thaw cycle that would render most of the trails (walking and biking) unusable in winter months
  - Significantly reduces trail maintenance and damage from the environment. A relevant example being the Time Walk on Queenstown Hill – which has a smooth surface inside the tree canopy and a rutted out, water damaged surface for the upper portion outside of the forested area
  - Shading – the benefit that trees provide to shade tracks simply cannot be underestimated. Walking or biking trails on hot summer days is far more enjoyable in the shade of the forest
  - Transpiration and cooling effect of the forests
  - Much of the terrain within the Reserves is steep and rocky. It simply cannot support widespread trail networks without the trees managing soil moisture, preventing run-off, and binding the hillside together.
- The carbon sequestration of these forests is significant and measured in the tens of thousands of tonnes per year. As mature trees, their rate of sequestration is high(>25t/ha/yr) and even if the Reserves are re-planted, removal will result in large carbon emissions that will take decades to offset.
- The Otago Regional Council Pest Management Plan has wilding conifers in the Progressive Containment Programme. Complete eradication of wilding conifers is therefore not a requirement of regional (or national) management plans and provides the option to maintain selected areas of reserve in forest cover.

### **Conclusion**

Ultimately, as a long-term resident and frequent user of both Reserves, I would like the Draft Plan to have a more balanced approach. That acknowledges that our world class mountain bike network has grown, largely organically, inside these established forests as the forests are solely responsible for providing the environment that enables them to exist. Perhaps the best way to articulate this is by highlighting what MTB trails look like outside of forested areas.

- The only trail network of significance in our area that is not within an established forest, are those on the face of Coronet Peak. Which cannot be ridden for 6-8 months of the year due to the free-thaw cycle, require tens of

thousands of dollars in maintenance each Spring to bring the trails up to a rideable standard, and can't be ridden in the wet. Without established forests, Queenstown would lose its year-round, all-weather attractiveness as a place to ride mountain bikes. The economic cost of this is likely measured in the tens of millions of dollars ([Bike visitor spend](#) is estimated by Benji Patterson to be \$210m or 50% of the ski visitor economy by 2026).

In simple terms - if the financial cost of containment of wilding spread from the 'seed-source' within Ben Lomond and Queenstown Hill Reserves is less than the tangible and intangible benefits maintain the trees, or selected parts of, provide. What is the harm in keeping a few tens of hectares of established conifer forest amongst tens of thousands of hectares of sub-alpine tussock-land and regenerating bush within the Wakatipu?

Yours sincerely,

Joe Robinson

QLPM - Property Manager

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## 50. John Seely

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**From:** John Seely  
**Sent:** Monday, 17 March 2025 3:39 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Queenstown hill management plan submission

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Hi ,

Please see my submission below regarding the Queenstown hill management plan.

### **Submission on the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan**

Thank you for the opportunity to provide feedback on the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan. I appreciate the work that has gone into the draft document and the community engagement that has been undertaken so far.

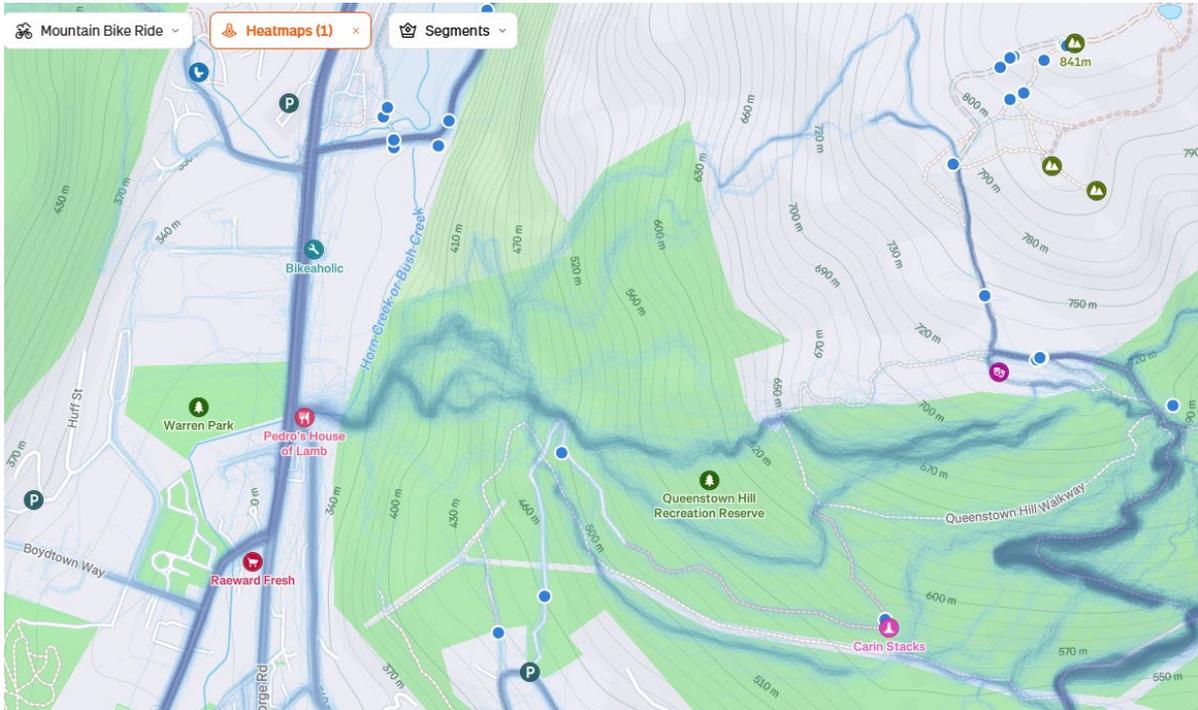
In general, I support the objectives and policies of the draft plan, particularly those that focus on promoting and enhancing recreational facilities and improving access to the reserves. However, I have concerns about certain aspects of the draft plan, which I believe need further consideration to better align with community wishes and improve outcomes for both residents and visitors.

Below, I provide specific feedback on various sections of the draft plan, citing relevant excerpts from the document

#### **Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve**

The draft plan mentions “unauthorised mountain biking tracks” that have been developed in the reserve. The use of the term "unauthorised" carries a specific legal meaning under the Reserves Act 1977, which is different from what is suggested in this context. I recommend reconsidering the use of the word "unauthorised."

The wording in Section 8 appears to downplay the significance of the mountain bike (MTB) trail network within Queenstown Hill Reserve. These trails, as indicated by the Strava heatmap, are well-established, with some having existed for over 20 years. The network is an important part of the recreational landscape, and its popularity is reflected by the frequency of use, as shown by the heatmap.



Queenstown Hill Reserve, along with Ben Lomond Reserve and the 7-Mile area, serves as a year-round, all-weather mountain biking destination that is accessible from the town. The proximity to the CBD, along with the natural features present, make this area internationally significant for mountain biking.

The draft plan should be amended to acknowledge the established MTB trail network in Queenstown Hill Reserve and recognize that it is actively used by both local residents and international visitors. While these trails may be classified as "unsanctioned" or "unofficial," the draft plan should aim to work collaboratively with the MTB community to formalize them, where appropriate. Section 13.2 of the plan should include new objectives and policies specifically addressing MTB trails on Queenstown Hill. It is important to address these trails rather than ignore them simply because sufficient resources haven't been allocated to address compliance issues.

These proposed changes would help align the draft plan with the current (2005) Reserve Management Plan, which allows for mountain bike trails on Queenstown Hill (11.1.1(7)) and is consistent with the Reserves Act's classification of these areas as recreation reserves.

#### **Section 13.1.4 – Ben Lomond Bike Trails**

The draft plan mentions that consideration will need to be given to the bike trail network when exotic vegetation removal occurs. The wording suggests that the removal of exotic species on Ben Lomond is inevitable. However, this does not reflect the views of many community members, who would likely be surprised to learn that trees are slated for removal, given the backlash against forestry operations in Ben Lomond Reserve, particularly in relation to the damage to the Queenstown Cemetery.

Furthermore, the draft plan suggests that removing the exotic vegetation could be harmonized with maintaining the bike trail network. In reality, the biking trails in these reserves are closely tied to the established tree canopy, which helps protect the trails. The

terrain is steep, and the soil profile is too shallow to support trails without the dense tree cover. The removal of trees would not be compatible with maintaining the bike trails.

### **Section 14.3.1 – Landscape Protection Forestry**

The draft plan calls for the implementation of a forestry plan to remove pest species, particularly Douglas Fir, on Te Tapunui Queenstown Hill. However, the plan does not include the same balanced and staged approach proposed for Ben Lomond. It's unclear why Queenstown Hill would require urgent action while Ben Lomond will receive a more gradual, holistic approach. The removal of wilding species should not overshadow other community concerns. Wilding removal without a subsequent revegetation plan could lead to the proliferation of other invasive species, as has been seen at Morningstar Beach Recreation Reserve, where uncontrolled wilding removal has allowed Sycamore, Blackberry, and other weeds to take over.

### **Section 14.6.9 – Biking & Walking Tracks**

The draft plan proposes removing and rehabilitating "unauthorised" tracks and trails. However, many of the most popular and frequently used MTB trails in the region started as unauthorised tracks. There should be a path to officially recognize these trails, where appropriate, to preserve the world-class mountain biking destination that Queenstown Hill represents. The MTB community is likely to be more supportive of converting some "pirate" trails into official trails than simply removing all unauthorised tracks. A collaborative approach will help foster better relationships between the community and the local council, increasing the chances of future trail-building approvals.

### **General Comments**

The draft plan places a strong emphasis on removing wilding conifers, often at the expense of recreational use and other benefits to the community. While there are certainly negative aspects to wilding species, they also provide significant recreational, social, and economic benefits, which are not adequately addressed in the draft plan. These benefits, which should be part of a more balanced discussion, include:

- The trees help stabilize steep, geologically unstable hillsides, protecting the community below from rockfall, debris, and landslides. The cost of installing engineered rockfall barriers to provide similar protection would be extremely high—likely in the tens of millions of dollars.
- Queenstown Hill and Ben Lomond Reserves have been covered by trees for generations, and the forested landscape is an iconic part of the town's backdrop.
- Parts of the reserves may fall under the Emissions Trading Scheme, and deforesting pre-1990 forest may incur costs that are not addressed in the draft plan.
- The economic impact of removing the wilding conifers or MTB trails from Queenstown Hill has not been adequately considered. The MTB sector contributes significantly to the local economy, with bike visitors expected to contribute \$210 million by 2026.

Additionally, the trees provide tangible benefits for recreation, including:

- Protection from freeze-thaw cycles that make trails unusable in winter.
- Reduced maintenance and damage to trails due to the shelter the trees provide.
- Shade, which enhances the experience of walking or biking on hot summer days.
- The cooling effect and transpiration benefits of the forests.

- Soil moisture management, which helps prevent erosion and supports trail networks in the steep, rocky terrain.

The carbon sequestration value of the forests is also significant, and the removal of trees would result in substantial carbon emissions that would take decades to offset. The Otago Regional Council Pest Management Plan does not require the complete eradication of wilding conifers, leaving the option to maintain selected areas of forest within the reserves.

### **Conclusion**

As a long-term resident and frequent user of both reserves, I urge the draft plan to adopt a more balanced approach. The established forests in these reserves are crucial for maintaining the MTB network, which has grown organically within these trees. Without this forest cover, Queenstown would lose its appeal as a year-round, all-weather mountain biking destination. The economic cost of losing this feature could be in the tens of millions of dollars.

Ultimately, if the financial cost of managing wilding spread is lower than the tangible and intangible benefits provided by maintaining the trees, it is worth reconsidering the approach to removing them. A more balanced management plan should preserve these forests where possible, given the value they provide to the community and the environment.

Yours sincerely,

John Seely

### **John Seely**

Regional Director.

Central Otago, MNZIQS

**M:**

## 60. ZJV (NZ) Limited, trading as Ziptrek Ecotours

17 March 2025

Queenstown Lakes District Council  
Via email: letstalk@qldc.govt.nz

Dear Sir / Madam,

### **FEEDBACK: DRAFT TE-TAUMATA-O-HAKITEKURA BEN LOMOND AND TE TAPUNUI QUEENSTOWN HILL RESERVE MANAGEMENT PLAN**

This feedback is provided on behalf of ZJV (NZ) Limited, trading as Ziptrek Ecotours.

Ziptrek Ecotours is a leaseholder on Te-Taumata-o-Hakitekura Ben Lomond Reserve.

While Ziptrek Ecotours generally supports the draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan, it seeks amendments to better address a number of key issues affecting the reserves. The amendments sought are set out in **Attachment A** below.

In light of the importance to the District of these reserves (being a highly visited location in New Zealand, both by locals and tourists), Ziptrek Ecotours would like to see this review process be used to create a Reserve Management Plan that is aspirational about the outcomes it seeks and the management methods to achieve those outcomes, rather than maintaining the status quo.

Ziptrek Ecotours would like to be heard in person before a hearing panel.

Ziptrek Ecotours understands this feedback will be treated as public information.

Yours sincerely,



Maddy Grandiek  
**Brown & Company Planning Group**

#### **Attachments:**

- A. Table of amendments sought to the draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan**

## ATTACHMENT A

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
General / whole RMP	Seek amendments to the entirety of the RMP to ensure consistent application of the terms "recreation / recreational" and "commercial recreation"	The terms "recreation / recreational" and "commercial recreation" are used inconsistently and interchangeably throughout the RMP document. This makes it unclear for readers to determine if a particular objective or policy is intended to apply to a particular activity. For example, mountain biking could arguably fall under either term, as while it does not offer a fee-paying service in and of itself, it is completely reliant on a commercial operator to achieve access to the reserve to undertake its activity.	Include a definition section or a glossary of terms within the RMP, which includes definitions for the terms "recreation / recreational" and "commercial recreation", in a manner which ensures existing activities are appropriately captured and which are unambiguously able to be applied to any future activities that may seek to establish in the reserve. Review the RMP in light of the definitions and update as necessary all references to these terms (particularly within the objectives and policies) to ensure the correct one is being used in the relevant context.
General / whole RMP	Seek amendments to ensure accurate reference to Ziptrek Ecotours	The RMP does not consistently or accurately reference the trading name of the submitter when referring to its operations.	Review the entire RMP to ensure all references use the correct trading name "Ziptrek Ecotours"
2. Vision (page 3)	Oppose / seek amendments to the Vision Statement as it relates to Te-Taumata-o-Hakitekura Ben Lomond.	Te-Taumata-o-Hakitekura Ben Lomond is an iconic landform, visitor destination, and playground for locals, with huge numbers of people visiting this land. The Vision Statement is currently broad and non-specific, and could be applicable to any reserve in the District.	Amend the Vision Statement to have separate statements for each, with the Te-Taumata-o-Hakitekura Ben Lomond Vision Statement to be more aspirational and future focused, and incorporating the following matters:

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		Instead the Vision Statement should reflect the significance of this reserve and be specific about the aspirations for its future. In particular, the Vision Statement for Te-Taumata-o-Hakitekura Ben Lomond should include goals for what the reserve will look like over time as it adjusts to the changing environment (particularly in relation to biodiversity, landscape and natural hazard matter) and prioritisation of the activities that best support the multi-use and high traffic nature of the reserve.	<ul style="list-style-type: none"> <li>• The iconic nature and high use of this reserve;</li> <li>• The need and ability to adapt to a changing environment; and</li> <li>• The need to (in light of the above matters) to prioritise activities that do not require exclusive use (either implicitly or explicitly) of reserve land.</li> </ul>
7.4 Wilding Conifers (page 7)	Support the text as it relates to alignment between the RMP, the District Plan, and the Pest Management Plan	The RMP correctly recognises that wilding conifers are invasive and pose a significant threat to established or new native forests.	Retain the text as it relates to alignment between the RMP, the District Plan, and the Pest Management Plan.
	Seek amendments to the text to recognise that, notwithstanding the positive effects of the removal of wilding species, the removal of established trees can create additional risks relating to soil character and geotechnical stability.	While the removal of wilding conifers is supported, this must be undertaken in a manner that ensures their removal does not create new or additional environmental risks, for example, the established trees around Ziptrek Ecotours operations cannot all be removed without risk of changes to soil character and geotechnical stability that would undermine its existing activities.	Insert additional text into Section 7.4 that recognises that the removal of established wilding trees will give risk to erosion, wind and rain risks if not undertaken in a considered and gradual manner, and that this will affect reserve users.
	Seek amendments to the text to expand on what is meant by "considered and measured change" (page 8)	In relation to future revegetation strategies, the RMP states "To preserve the interests of all affected stakeholder groups and to effect long term biodiversity improvements, considered and measured change will be required." While the recognition of the inevitable change that will occur as a result of removal of wilding conifers is supported, the term "considered and measured change" is vague and provides no	Insert additional text into Section 7.4 as follows: "To preserve the interests of all affected stakeholder groups and to effect long term biodiversity improvements, considered and measured change will be required <u>to ensure a stable and safe environment, for activities both on the land and in the air, is achieved.</u>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		guidance to those reading the RMP about what this may look like or what it is seeking to achieve.	Any replacement vegetation undertaken should be considered in terms of ecological values, fire risk potential and the role of land stabilisation, while noting that these matters can sometimes conflict with one another."
7.5 Other Pest Animal and Plant Management (page 8)	Seek amendments to the text to more strongly address the issue of feral goats.	The inclusion of feral goats is correctly included as an issue on the reserve, and one which has the potential to undermine biodiversity improvements. However no potential solutions or methods to address this pest are included beyond identifying that "a coordinated approach across boundaries and agencies". This does not address the necessity for all stakeholders and surrounding land owners to commit to create a diverse and native revegetated reserve.	Insert additional text in Section 7.5 as follows: "A coordinated approach to control across boundaries and agencies is required to achieve an effective response within the area where feral goats can roam, <u>in order to achieve the aspirations for native revegetation of the reserve.</u> "
7.6 Co-ordinated Management (page 8)	Seek amendments to the text to more clearly establish the roles of various parties.	While the recognition of the need for a co-ordinated approach to the management of Te-Taumata-o-Hakitekura Ben Lomond is supported, this section as currently written is vague about the roles of the parties mentioned. QLDC and DOC as landowners have a greater level of responsibility than the other stakeholders mentioned, although the stakeholders play an important role in supporting QLDC and DOC in achieving their aspirations for the land.	Insert additional text in Section 7.6 as follows: "It is important to ensure coordination between QLDC and DOC <u>as landowners by taking the lead role in creating the response to the ecological issues</u> , as well as <u>the role key stakeholder groups such as the WCG, the Queenstown Mountain Bike Club, commercial lessees, and adjoining landowners play in helping them achieve these goals.</u> "
8.1 Description of Primary Users and Activities (Te-Taumata-o-	Seek amendments to the text to ensure an accurate description of Ziptrek Ecotours operational and maintenance requirements.	The inclusion of text detailing the operations of Ziptrek Ecotours is supported, however the current description does not accurately reflect the full ambit of its operations and maintenance requirements.	Insert additional text in Section 8.1 as follows: "Ziptrek Ecotours operates ziplining tours from Bob's Peak that includes six ziplines and twelve treehouses, <u>and requires unimpeded ground access as well as air access for both</u>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
Hakitekura Ben Lomond Reserve)			<u>operational and maintenance purposes. This can be accessed by riding the Gondola or via the Tiki Trail walking tracks."</u>
9.3 Natural Hazards (Wildfire Risk) (page 10)	Seek amendments to the text to require a coordinated approach to addressing wildfire risk.	The recognition of fire risk to all users of Te-Taumata-o-Hakitekura Ben Lomond is supported, however further positive action by landowners and key stakeholders should be required. Actions should include the development of a plan to reduce fire load and ignition potential in key areas of the reserve and the creation of a fire refuge.	Insert additional text in Section 9.3 as follows: <u>"A fire risk adaptation plan is to be developed by QLDC, along with key stakeholders including ORC, FENZ, commercial lessees and reserve user groups, to detail how the following key fire risk reduction and response measures will be achieved:</u> <ul style="list-style-type: none"> <li><u>The removal of the fire load around the Skyline upper terminal building to enable it to operate as a fire refuge; and</u></li> <li><u>The reduction of ignition potential from the town centre via the creation of a buffer zone via tree removal in the lower reaches of the forest."</u></li> </ul>
10. Competing Recreational Demands (page 10)	Seek amendments to the text to include greater recognition of health and safety matters and the responsibility for these, and to articulate a preference for activities that do not result in exclusive use of reserve land.	While the recognition of the risks of competing uses within Te-Taumata-o-Hakitekura Ben Lomond is supported, the seriousness of these risks is not emphasised to the extent that it should be, particularly as it relates to health and safety matters and the responsibility for these. Currently Ziptrek Ecotours staff members regularly provide emergency first aid response to other users, particularly of the mountain bike trails, at financial cost to its business (through the reallocation of staff duties away from its own operational and maintenance requirements) and the emotional cost to those employees who respond to the emergencies. There should be greater direction regarding	Amend the text in Section 10 as follows: "The increase in the popularity of mountain biking, the introduction of e-bikes and the increase in the visitor and resident population has seen significant growth in the use of mountain bikes within the reserves. <u>The access road and trails that were previously exclusively used by foot traffic are now multiple use for mountain biking, which creates user conflict.</u> Many unauthorised mountain biking tracks have been developed outside the planned trail network within the reserves. These reduce the quality of the recreation experience and can adversely impact ecological values <u>and cause</u>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		users own responsibility for health and safety matters. In addition, there does not appear to be a comprehensive strategy for how conflicting activities will be managed in these multiple use reserves. For example, mountain biking is growing at a faster rate than other uses within the reserves and can result in conflict with those uses and exclusive land use by its nature. Those activities that can co-exist with other sensitive users of reserve land should be prioritised over those that, by their nature, effectively result in exclusive use of reserve land, or alternatively separated from them within the reserve.	<p><u>geotechnical stability issues, all of which affect other users."</u></p> <p><u>Existing and proposed walking trails and other non-exclusive uses should be given protection and priority over those uses which effectively result in exclusive use of reserve land, or conflicting uses should be separated wherever possible.</u></p> <p><u>All reserve users, recreational, commercial or otherwise, are responsible for their own health and safety response."</u></p>
11. Planned Commercial Recreation Developments (page 10)	Oppose the current wording as it does not address Ziptrek Ecotours.	Ziptrek Ecotours is aware of the improved understanding of the effects of wilding conifers and the increased risk around fire, and is conscious that dealing with these challenges will necessarily affect its business operations (which currently utilise wilding conifers). Ziptrek Ecotours should therefore be referenced in this section, to ensure that the future of its operations in relation to the changing nature of Te-Taumata-o-Hakitekura Ben Lomond is provided for.	<p>Insert new Section 11.4 as follows:</p> <p><u>"11.4 Ziptrek Ecotours</u> <u>Ziptrek Ecotours has advised that they are conscious of the changing nature of the reserve in response to a greater understanding of the fire and ecological risks from wilding conifers, and recognise a future opportunity to reestablish their current operations in a manner that responds to these challenges."</u></p>
Map (page 11)	Oppose the mapping as currently shown.	The map provided is not titled (therefore the purpose of it is not clear, is at a scale that makes it difficult for readers to interpret, and is potentially inaccurate. "Ziptrek Ecotours" is shown in the legend however it is not possible, due to the scale and quality of the graphics, to determine if this is accurately depicted. It is not clear, as the map is untitled, why Ziptrek	Insert a new map, titled, at a scale and clarity that enables Ziptrek Ecotours to confirm its operations are accurately depicted.

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		Ecotours is included in the legend but other operators within Te-Taumata-o-Hakitekura Ben Lomond have not been mapped.	
12. Objectives (page 12)	Seek amendments to include a new, more aspirational objective for Te-Taumata-o-Hakitekura Ben Lomond.	The objectives for Te-Taumata-o-Hakitekura Ben Lomond should be aspirational and address how the reserve should be managed in an exemplary way to maintain and improve the reputation of this iconic area.	Insert new objective into Section 12 as follows: <u>"12.X To maintain and enhance the reputation of Te-Taumata-o-Hakitekura Ben Lomond as an iconic landmark and playground for both visitors and locals through innovative and responsive management practices."</u>
Objective 12.6	Seek amendments to include commercial recreation to the objective.	The objective as currently written relates to "recreation opportunities" and it is unclear as to whether this extends to commercial recreation (see related point above regarding definitions of these terms).  The objective to enable opportunities that are sustainable and low impact is positive and should be supported, however it should be extended to also apply to commercial recreation opportunities as well.	Amend Objective 12.6 as follows: "To enable new recreation <u>and commercial recreation opportunities</u> that are sustainable and low impact on the environment."
Objective 12.12	Support the objective.	The objective to provide recreation opportunities for people of all abilities is supported.	Retain the objective as notified.
Objective 12.13	Support the objective.	The objective to provide for a variety of appropriate commercial recreation opportunities within Te-Taumata-o-Hakitekura Ben Lomond is supported.	Retain the objective as notified.
Objective 12.15	Seek amendments to the objective.	While the recognition of the positive effects of built structures is supported, it is not clear what is intended to be captured by this term and it could benefit from further clarification or a definition. For example, built structures could	Amend Objective 12.15 as follows: "To promote built structures that support the recreation uses of the reserves and that positively contribute to the reserve amenity and provide public benefit <u>provided these avoid or</u>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		also include woodwork / wooden berms constructed on the mountain bike trails (which can arguably contribute to reserve amenity and provide public benefit), however these can have adverse impacts on other users in the vicinity and on the environment.	<u>mitigate adverse effects on other users and the environment.</u> "
Objective 12.16	Seek amendments to the objective.	The objective appears to have a focus on mountain biking and walking uses due to the use of the term "trail", which potentially excludes other uses of the access ways (whether trail, track or road) located within Te-Taumata-o-Hakitekura Ben Lomond. The objective should be amended to be more open to other users and access generally.	Amend Objective 12.16 as follows: "To formalise a sustainable and well managed <del>trail</del> <u>access</u> network within the reserves that meets the needs of a range of <del>trail</del> users, provides a cohesive track network, and considers ongoing safety requirements."
13.1.6 Tiki Trail and Upper Brecon Street Reserve Entrance (page 18)	Seek amendments to the text to include Ziptrek Ecotours as users of the Tiki Trail.	The description of the users of the Tiki Trail fails to recognise Ziptrek Ecotours' ground operations, which should be included. Ziptrek currently maintains the areas of the Tiki Trail that it utilises, year round. Ziptrek has also contributed cash and advice as to the alignment of the Tiki Trail, to support removing the public off the access road and to re-established this trail as part of the original location of the historic Ben Lomond walk, according to Barb and Neill Simpson (ecologist/ex DOC).	Amend 13.1.6 as follows: "The Tiki Trail is a very popular walking trail that leads from the Queenstown Cemetery to the beginning of the Ben Lomond Trail. It provides walking access to Bob's Peak, as an alternative to the Skyline Gondola, <u>and is used as part of Ziptrek Ecotours' ground operations.</u> "
Objective 13.1.6.2 (page 18)	Seek amendments to the objective to recognise the	The Tiki Trail entrance/exit area is a high use conflict/interface area. Walkers using the Tiki Trail cross the mountain bike trail where cyclists are exiting at high speed. The objective should be amended to recognise this existing conflict, and should seek to resolve this issue.	Amend Objective 13.6.1.2 as follows: "To recognise and upgrade the Tiki Trail entrance area as one of the primary walking access points into the reserve <u>to improve the safety of all users at this high use area.</u> "

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
Policy 13.1.7.5 (page 19)	Seek amendments to the objective to not limit the uses considered.	The meaning of 'dual' in this policy is unclear and could create confusion about what uses are being supported. The term 'dual' has the potential to be unnecessarily restrictive and should provide for a wide range of users.	Amend Objective 13.1.7.5 as follows: "Support the development of a new <del>dual</del> multi use uphill-trail near One Mile to connect to the existing network."
13.3.1 Te-Taumata-o-Hakitekura Ben Lomond Reserve - Lakeview Development (page 22)	Seek amendments to the text to provide greater clarity on the proposed new entrance point location and infrastructure.	While it is appreciated that Lakeview is still under development, the map on page 22 appears to identify an entrance location while the supporting descriptive text in 13.3.1 merely states that a new arrival area "should" be established which provides "key recreation infrastructure". This is vague and provides no guidance to readers about what is anticipated and where.	Amend the text of 13.3 to provide any further detail / clarification about where potential new Lakeview reserve entrances may be and what the key recreation infrastructure to be provided must include.
Policy 13.3.1.4 (page 22)	Seek amendments to the policy to not limit the users (note typo in numbering in document).	It is unnecessarily restrictive to limit the new connections to walkers, runners and cyclists and other potential reserve users should also be considered.	Amend Policy 13.3.1.4 (note typo in numbering) as follows: "Establish connections into the Lakeview development ( <del>for walkers, runners and bikers</del> ); <u>for all users of the reserve.</u> "
14.2 Effective Cross Organisation Management	Seek amendments by way of specific reference to key stakeholders.	Section 14.2 should include specific reference to key stakeholder groups that play major roles in the success operation and maintenance of Te-Taumata-o-Hakitekura Ben Lomond as an iconic reserve in the significant areas of fire risk and ecological enhancement. The commercial lessees operating within the reserve (informally known as the Ben Lomond Users Group) should be specifically recognised for the important role that they play in achieving the sought outcomes for the reserve. In addition, FENZ is an organisation that has a significant	Insert new policies as follows: <u>14.2.4 Recognise the important role that commercial operators in Te-Taumata-o-Hakitekura Ben Lomond (collectively known as the Ben Lomond Users Group) play in achieving exemplary management of the reserve.</u> <u>14.2.5 Collaborate with FENZ on an ongoing basis to mitigate risk from fire.</u>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		impact on the day-to-day operations of the reserve and should be recognised.	
Policy 14.3.3 (page 24)	Seek amendments to the policy to clarify terms and ensure all effects are considered.	While the intent of the policy is supported, it should be noted that the matters listed are not exhaustive. Additional matters of significance, such as safety, should be explicitly included in the list, while others should be clarified or expanded upon.	Amend Policy 14.3.3 as follows: "Recognise that forestry plans need to consider, <u>as a minimum</u> : a. minimal impact on <u>amenity recreation values and safety of users</u> through the use of low impact extraction methods, while recognising the long-term goal of restoring the natural environment and enhancing biodiversity values. b. allowing for revegetation with a mix of native and non-invasive exotic species. c. acknowledgement that some of the commercial recreation operators on the reserve have consent conditions which require vegetation to screen their activity to minimise the visual impact of their infrastructure, <u>while others will be affected by changes to the environment (such as structural implications) and will need to adapt to these changes.</u> d. ..."
Policy 14.3.4 (page 24-25)	Seek amendments to the policy to recognise a wider range of parties that will need to participate in the management of vegetation in the reserves.	The policy fails to recognise other parties beyond adjoining landowners, such as commercial lessee holders within the reserves, will play a pivotal role in supporting the management of vegetation to reduce natural hazard risk and pests.	Amend Policy 14.3.4 as follows: "Apply a cross-organisational approach in the management of vegetation in the reserves and where possible, work with adjoining landowners, <u>key stakeholders (including commercial operators within the reserve)</u> to reduce natural hazard risks and pests."
Policies 14.3.10-14.3.12 (Fire) (page 25)	Seek amendments to the layout / ordering of the policies	Fire risk is a significant issue facing the ongoing management of Te-Taumata-o-Hakitekura Ben Lomond. This significance should be reflected	Move the policies relating to Fire (numbered 14.3.10-14.3.12) up in the order of policies as listed to reflect the importance of this particular

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		in the ordering of the various policies by moving the policies relating to Fire higher up in the list.	issue within Te-Taumata-o-Hakitekura Ben Lomond.
Policy 14.3.10 (page 25)	Seek amendments to the policy to include the opportunity from input from key stakeholders.	The plan referred to in this policy applies to all reserves, and does not specifically address particular issues around wilding conifers or high risk reserves such as Te-Taumata-o-Hakitekura Ben Lomond. It does also not specify a review period within the document itself, or provide for opportunity for input from commercial lessees within reserves (despite acknowledging that commercial lessees are part of the intended audience of the plan). If this plan is to be utilised (as opposed to a separate plan addressing Te-Taumata-o-Hakitekura Ben Lomond) more specificity about reviewing and the opportunity for input is necessary.	Amend Policy 14.3.10 as follows: "Actively implement and regularly <u>(at least every two years)</u> review the QLDC 'Activity controls to manage wildfire risk within reserves' <u>in collaboration with FENZ and the Ben Lomond Users Group.</u> "
Policy 14.3.11 (page 25)	Seek amendments to the policy to limit closures of Te-Taumata-o-Hakitekura Ben Lomond as a last resort mitigation measure.	While it is understood that reserve closures may be necessary from time to time to manage fire risk within Te-Taumata-o-Hakitekura Ben Lomond, this should be as a last resort and the policy should be specific that all other mitigation measures available should be utilised prior to closing the reserve.	Amend Policy 14.3.11 as follows: " <del>Recognise that Allow for</del> reserve closures <u>may be necessary as method</u> to mitigate <u>fire risk</u> for reserve users, <u>but that all other potential methods to mitigate fire risk should be utilised first.</u> "
Policy 14.3.12 (page 25)	Seek amendments to the policy to include more specificity including performance standards.	The intent of the policy is supported, however further detail on specific measures at Te-Taumata-o-Hakitekura Ben Lomond should be included in light of the high use nature of this reserve.	Amend Policy 14.3.12 as follows: "Support the removal and/or modification of vegetation to reduce the likelihood of a wildfire, <u>including through the following measures in Te-Taumata-o-Hakitekura Ben Lomond:</u> a. <u>The removal of the fire load around the Skyline upper terminal building to enable it to operate as a fire refuge;</u> <u>and</u>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
			b. <u>The reduction of ignition potential from the town centre via the creation of a buffer zone via tree removal in the lower reaches of the forest.</u>
Policy 14.3.14 (page 25)	Seek amendments to the policy to include reference to commercial operators.	Commercial operators are also potentially affected by the placement and maintenance of utility services and consideration of them should be included in the policy.	Amend Policy 14.3.14 as follows: "Permit the placement and maintenance of utility services where the reserve will not be materially altered or permanently damaged, and the ability of the public using the reserves <u>reserve users and commercial operators</u> will not be permanently or adversely affected."
Policy 14.3.18 (page 25)	Seek amendments to the policy to include reference to commercial operators.	Commercial operators are also potentially affected by hard engineering structures and consideration of them should be included in the policy.	Amend Policy 14.3.18 as follows: "Where practicable, protect the provision of public recreational <u>and commercial operator</u> access to the reserves when enabling hard engineering structures where necessary to manage natural hazard risk."
Policy 14.5.7 (page 26)	Seek amendments to the policy to include all aspects of Ziptrek Ecotours' operations.	In addition to the structural components of Ziptrek Ecotours' operations, unimpeded ground access (via the access road and the Tiki Trail) also forms a key part of both operations and maintenance requirements, as does the ability to access its ziplines in the air. These should be reflected in the policy.	Amend Policy 14.5.7 as follows: "Recognise the continued operation of existing leases on the reserves, as set out in Appendix 3, within their current footprints, being: a. Skyline Enterprises (including upper and lower terminal buildings, luge tracks and gondola corridor) b. Ziptrek Ecotours (12 towers and 6 ziplines, <u>ground access (via road and on foot, and air access)</u> ) c....

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
<p>Policy 14.5.10 (page 27)</p>	<p>Seek amendments to the policy to include amendments to or expansion of existing leases, and clarify the values to be considered.</p>	<p>The policy should apply beyond consideration of new leases or renewals, to encompass expansion or amendment of existing leases also.</p> <p>The term "general character and amenity" is not used elsewhere in the RMP and what these values might include is not stated and could therefore be subjectively determined. In addition, "general character and amenity" should not be a determining factor for applications in a reserve – rather recreation values should be the key consideration. This consideration needs to be undertaken with the acknowledgement that reserves are not a static environment but are everchanging and complex, and in the case of Te-Taumata-o-Hakitekura Ben Lomond, is an iconic reserve that is home to many public and commercial recreation users.</p>	<p>Amend Policy 14.5.10 as follows:</p> <p>"Consider the granting of new commercial lease or licence agreements, or the renewal, <u>expansion or amendment</u> of existing lease and licence agreements, that:</p> <ol style="list-style-type: none"> <li>Are consistent with the reserve's classification and any reserve specific policies set out in the special management zones in section 6.</li> <li>Do not adversely detract from the <u>recreation values general character and amenity of the reserve, while recognising that these can change over time and other reserve users.</u></li> <li>Allows <u>commercial</u> recreation activity that uses the unique topography of the reserve to improve the public use and enjoyment.</li> <li>Ensure commercial operators contribute to improved environmental outcomes on the reserves."</li> </ol> <p>Alternatively, if "general character and amenity" is retained, insert a new section into the RMP that identifies the following matters as relevant to the general character and amenity of Te-Taumata-o-Hakitekura Ben Lomond:</p> <ul style="list-style-type: none"> <li>multi-use</li> <li>variable access</li> <li>recreational and commercial</li> <li>biodiversity and ecological values and changing cultural perceptions of that</li> </ul>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
			<ul style="list-style-type: none"> <li>increasing fire risk and potential for natural hazards i.e., landslip</li> <li>increasing visitation from town and tourism.</li> <li>cultural values</li> </ul>
Policy 14.5.14 (page 27)	Oppose this policy.	It is not necessary or appropriate to specify within an RMP policy the matters to be covered in a commercial agreement.	Delete Policy 14.5.14.
Policy 14.5.16 (page 27)	Seek amendments to the policy to accurately reference Ziptrek Ecotours and ensure consistent approach to commercial operators affected by wilding conifer removal and ongoing forestry operations.	Ziptrek Ecotours' operations has the potential to be significantly affected by wilding conifer removal and ongoing forestry operations. There should be a consistent approach to those commercial operators affected by these matters in the policies.	Amend Policy 14.5.16 as follows: <b>"Ziptrek Ecotours</b> <u>Work closely with Ziptrek around the wilding conifer removal and ongoing forestry operations in the vicinity of their existing lease area Enable renewal or relocation of Ziptrek Ecotours' infrastructure, and work closely with them over the wilding conifer removal, ongoing forestry operations and replanting, in the vicinity of their lease area."</u>
Policy 14.5.23 (page 28)	Seek amendments to the policy to recognise the risks that freedom camping can create.	Freedom camping has the potential to create risks, including from rubbish and human waste, and increased fire risk, that can adversely effect other reserve users use and enjoyment. The policy should recognise the risks that can arise from freedom camping, particularly in light of the current absence of a Freedom Camping Bylaw to otherwise restrict and monitor freedom camping within the District.	Amend Policy 14.5.23 as follows: "Manage freedom camping as an ongoing issue <u>that has the potential to create risk (including from fire and waste) to reserve users</u> and install mechanisms to restrict this, for example consider lockable gates at reserve entrances."
Policy 14.6.1 (page 28)	Oppose this policy.	This policy relates to structures necessary for the function and support of "formal and informal recreation activities". These terms are not defined and it is therefore not clear what types	Delete this policy, or alternatively clarify the intent of the policy and/or define the terms "formal and informal recreation activities".

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		of built structures are intended to be provided for by this policy.	
Policy 14.6.6 (page 29)	Seek amendments to this policy to include additional key stakeholders / reserve users and address additional issues arising from the mountain bike trail.	Mountain bike trails have the potential to adversely impact other reserve users (including through health and safety matters, construction of new or expansion (authorised or not) of existing trails) and therefore other reserve users should have the opportunity to provide input into a Trail Masterplan.	<p>Amend Policy 14.6.6 as follows:</p> <p>“Work with the key stakeholders, <u>including the Ben Lomond Users Group</u>, to develop and implement a Trail Masterplan that formalises the mountain bike trail network. This will include:</p> <ol style="list-style-type: none"> <li>a. Identification of the existing trail network and categorise: <ol style="list-style-type: none"> <li>i. Pedestrian/walking only trails</li> <li>ii. Dual use trails</li> <li>iii. Mountain Bike Trails</li> </ol> </li> <li>b. Identify where new trail connections could be developed and where unauthorised tracks can be closed and remediated.</li> <li>c. Pedestrian/walking only tracks that include: <ul style="list-style-type: none"> <li>• One Mile trail</li> <li>• Tiki Trail (including a buffer),</li> <li>• Te Tapunui Queenstown Hill Time Walk,</li> </ul> </li> <li>d. Grading of all mountain biking tracks.</li> <li>e. Development of trail maintenance guidelines, which minimise impacts on landscape, and biodiversity and are guided by effective standards relating to track grading, design and construction.</li> <li>f. Inclusion of a review date within the trail masterplan.</li> </ol>

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
			<p><u>g. Minimisation of trails which result in exclusive use of an area or otherwise compromise the health and safety of other reserve users.</u></p> <p><u>h. Avoiding the widening or otherwise increasing in size of existing trails over time ."</u></p>
Policy 14.6.14 (page 29)	Oppose this policy.	The access road should be maintained for emergency and operational access only - walkers and bikers should be strongly discouraged from crossing or using the access road.	Delete this policy and replace with the following: <del>"Ensure public recreation access along the existing access road to Bob's Peak and upper Skyline Gondola terminal is preserved.</del> <u>Ensure the existing access road to Bob's Peak and upper Skyline Gondola terminal is preserved for emergency and operational access only, and avoid all recreational use of the road as a non-compatible use"</u>
Policy 14.6.20	Support this policy.	This policy acknowledges the importance of sharing the stories and reserve with all users, which is an important aspect of Ziptrek Ecotours' philosophy.	Retain this policy as notified.
New policy	Seek amendments to include a new policy relating to fire risk signage.	Fire risk is a significant issue in Te-Taumata-o-Hakitekura Ben Lomond and the RMP should provide for improved signage to address this issue.	Insert new signage policy as follows: <u>"14.6.22 Establish signage to provide information relating to fire risk within the reserves."</u>
Appendix 1 – Reserve Map	Oppose the mapping as currently shown.	The map provided is at a scale that makes it difficult for readers to interpret, and is potentially inaccurate. "Ziptrek Ecotours" is shown in the legend however it is not possible, due to the scale and quality of the graphics, to determine if this is accurately depicted. It is not clear, as the map is untitled, why Ziptrek Ecotours is included in the legend but other	Insert a new map at a scale and clarity that enables Ziptrek Ecotours to confirm its operations are accurately depicted and is updated to clarify if the Access Road as mapped is the legal or formed road.

The specific part of the RMP that my submission relates to are:	I support / oppose the specific part, or seek amendments:	The reasons for my view are:	Relief sought:
		operators within Te-Taumata-o-Hakitekura Ben Lomond have not been mapped. In addition, it is not clear if the Access Road as mapped is showing the legal road, or the formed road. This should be clarified.	
Appendix 3	Seek amendments to the appendix to include all leaseholders.	ZJV Limited (trading as Ziptrek Ecotours) is not included in the list of lease holders in Appendix 3 when it should be listed as within Te-Taumata-o-Hakitekura Ben Lomond.	Update Appendix 3 to ensure it accurately depicts all leaseholders.

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**From:** Matthew Packwood  
**Sent:** Monday, 17 March 2025 9:55 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Queenstown hill management plan public submission

Hi,

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Please see my submission below regarding this plan submission.

**Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission.**

Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort that has gone into developing the draft plan and acknowledge the community engagement undertaken to date.

I am generally supportive of the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access to the Reserves. However, I have significant concerns regarding specific aspects of the Draft Plan that require further consideration to better align with community interests and ensure improved outcomes for both residents and visitors.

Below, I provide detailed commentary on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is taken directly from the Draft Plan.

**Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve**

*Unauthorised mountain biking tracks have also been developed with the....*

The term “unauthorised” carries a specific legal connotation under the Reserves Act 1977

that does not fully align with its use in this context. The wording should be reconsidered to ensure clarity.

Additionally, the Draft Plan appears to downplay the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. These trails, as evidenced by Strava heat maps, have been in place for over 20 years and are well-established.

Queenstown Hill Reserve is one of only three all-year, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). The natural features and proximity to the town center make this MTB area internationally significant.

The Draft Plan should be updated to accurately reflect the current use of the Reserve by mountain bikers. While acknowledging that these trails are ‘unsanctioned’ or ‘unofficial,’ the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be incorporated into Section 13.2. Ignoring this well-established trail network due to resource constraints is not an acceptable long-term strategy.

Such revisions would align the Draft Plan with the existing (2005) Reserve Management Plan, which provided for mountain biking with restrictions near the Time Walk track and a requirement that MTB use be limited to formed and approved trails. Additionally, this approach would be consistent with the Reserve’s classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

This wording suggests that the removal of exotic species in Ben Lomond is inevitable. While community engagement has guided the Draft Plan, the broader community may not fully support this assumption. The backlash following the damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve demonstrates strong community sentiment regarding tree removal.

Furthermore, the assumption that bike trails can be maintained post-deforestation is flawed. The presence of trails is intrinsically linked to the established tree cover, which stabilizes steep terrain and maintains suitable soil conditions for trail sustainability. The Draft Plan should acknowledge these challenges.

#### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.*

This section lacks the qualifying statements found in Section 14.3.2, which outline a staged approach followed by revegetation efforts. Why does the Queenstown Hill Forestry Plan require immediate action without a similarly balanced approach?

The plan must consider potential negative consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, staged approach that integrates revegetation efforts is necessary to avoid unintended ecological and landscape degradation.

## Section 14.6.9 – Biking & Walking Tracks

*Remove and rehabilitate unauthorised tracks and trails.*

The Draft Plan fails to acknowledge that many of Queenstown’s best and most frequently used MTB trails began as ‘unauthorised’ trails. Instead of blanket removal, an amnesty should be considered to incorporate well-established tracks into the official network where appropriate.

A collaborative approach with the MTB community would result in higher acceptance of formalizing some trails while decommissioning others. An overly rigid stance risks alienating a key user group and undermining compliance efforts.

### General Comments

The Draft Plan leans heavily toward wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced discussion is required to assess the financial and environmental costs of removal against alternative management strategies.

Key considerations missing from the Draft Plan include:

- **Slope Stability & Natural Hazard Mitigation:** The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions of dollars, which may be unaffordable for the community.
- **Historical and Aesthetic Value:** Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown’s identity.
- **Economic Considerations:** The Draft Plan acknowledges the economic benefits of mountain biking but does not address the financial impact of removing MTB trails or forested areas. Research estimates MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism.
- **Trail Sustainability & User Experience:** Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown’s attractiveness as a year-round MTB destination.
- **Carbon Sequestration:** These forests capture tens of thousands of tonnes of carbon annually. Removal would result in significant carbon emissions, taking decades to offset even with replanting efforts.
- **Regulatory Flexibility:** The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than requiring full eradication. A managed retention strategy could be considered instead of wholesale removal.

### Conclusion

As a long-term resident and frequent user of both reserves, I urge the Draft Plan to adopt a more balanced approach. Queenstown's world-class mountain biking network has flourished within these established forests because they provide an environment conducive to sustainable trails.

Comparing deforested MTB trails to forested ones highlights this point. The Coronet Peak trails, which exist outside of a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.

If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, then maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.

Yours sincerely,

Matthew Packwood

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**From:** Matthew Turner

**Sent:** Monday, 17 March 2025 10:22 PM

**To:** Let's Talk <letstalk@qldc.govt.nz>

**Subject:** Submission on the Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui Queenstown Hill Reserve Management Plan

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## **Submission on the Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui Queenstown Hill Reserve Management Plan**

Cheers for the opportunity to have a say on the future of Ben Lomond and Queenstown Hill Reserves. I appreciate the work that's gone into this draft and the effort to involve the community so far.

Overall, I support improving recreational facilities and access to these reserves. But there are a few key parts of the plan that don't sit right with me. They need more thought to better reflect what the community actually wants and needs. Below are my specific concerns.

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### **Section 8.2 – Mountain Biking in Queenstown Hill Reserve**

The plan refers to “unauthorised” mountain bike tracks, but that word has a legal meaning under the Reserves Act 1977 that doesn't really match up with how it's used here. Might be worth rewording.

The plan also downplays how big and important the mountain biking network is in Queenstown Hill Reserve. If you check out Strava heat maps, you'll see these trails have been around for decades and get heavy use. Queenstown Hill is one of the only spots in town where you can ride all year, no matter the weather. That's a big deal—not just for locals, but for visitors too.

Instead of ignoring these trails or calling them “unauthorised,” the plan should work with the mountain bike community to formalise and maintain them properly. There should be specific policies in the plan for managing MTB trails, rather than pretending they don't exist. The current Reserve Management Plan (2005) actually allowed for MTB use on approved tracks—why are we going backwards on this now?

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### Section 13.1.4 – Ben Lomond Bike Trails & Tree Removal

The wording here makes it sound like tree removal in Ben Lomond is a done deal, but I don't think that reflects what the wider community wants. The backlash over the Queenstown Cemetery forestry work proves that people aren't on board with large-scale clearing.

On top of that, the plan seems to assume that trails will still be fine after the trees go. That's just not true. The trees protect the trails—without them, the ground will be too steep and unstable. You can't just take the trees away and expect the trails to stay rideable.

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### Section 14.3.1 – Queenstown Hill Forestry Plan

The plan pushes for urgent tree removal in Queenstown Hill, but it doesn't explain why it's being treated differently from Ben Lomond, where a staged removal and replanting process is proposed. If a careful, long-term approach is good enough for Ben Lomond, why is Queenstown Hill getting the fast-track treatment?

Wilding removal isn't a simple fix. If you don't have a solid plan for revegetation, you end up with an even bigger mess—just look at Morningstar Beach Reserve, which is now overrun with sycamore, blackberry, and other weeds.

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### Section 14.6.9 – Removing “Unauthorised” Tracks

Lots of Queenstown's best and most-used MTB trails started as unofficial tracks. Blanket removal isn't the way to go. A better option would be to work with the mountain biking community to formalise the tracks that make sense and retire the ones that don't.

If you come down too hard on MTB riders, you'll just push people away from working with the council in the future. A bit of give-and-take will go a long way to getting the community on board.

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### General Concerns: Wilding Removal vs. What the Community Needs

The plan seems heavily focused on removing wilding pines, but it doesn't fully weigh up what we'd be losing in the process. There are a few major things missing from the discussion:

- **Erosion & Slope Stability:** These reserves are steep and prone to landslides. The trees hold the hillsides together and protect the town below. If they go, we'll likely end up spending millions on rockfall fences and other engineering solutions.
- **Scenic & Cultural Value:** Two generations of locals have only ever known these reserves as forested. That's what people picture when they think of Queenstown's backdrop.
- **Carbon Storage:** These forests suck up thousands of tonnes of CO<sub>2</sub> every year. Cutting them down would release a heap of carbon that will take decades to offset.
- **Economic Impact:** Mountain biking is a massive driver of tourism. By 2026, it's

expected to bring in **\$210M a year**, about half of what the ski industry does. If we lose our year-round trails, that's a big financial hit to local businesses.

Also, the ORC's Pest Management Plan classifies wilding pines as a "progressive containment" species, meaning **we don't actually have to eradicate them completely**. The draft plan should consider keeping some areas of forest intact rather than going for full removal.

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## Conclusion

I've lived here a long time and use these reserves regularly. I'd like to see a more balanced approach in this plan—one that acknowledges how important these forests are for mountain biking, recreation, and the local economy.

Without tree cover, the trails in these reserves won't survive. The only significant MTB network in the area that's not in a forest is Coronet Peak, and it's barely rideable for **half the year** because of freeze-thaw cycles. Those trails also require tens of thousands of dollars in maintenance every spring. If we lose our forested trails, we lose Queenstown's reputation as a year-round riding destination. That could cost the town millions.

At the end of the day, if the cost of managing wildings is lower than the benefits of keeping some of the trees, what's the harm in leaving a few hundred hectares of managed forest? Among all the tussock land and regenerating bush in the Wakatipu, it wouldn't make a huge difference ecologically, but it would mean a lot to the community that actually uses these reserves.

Cheers,

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**Matt Turner**

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## Queenstown Mountain Bike Club (QMTBC) Submission

### For The Draft Ben Lomond and Queenstown Hill Reserve Management Plan 2024

The Ben Lomond Reserve and the Queenstown Hill Reserve are important areas for the QMTBC and over a number of decades we have developed a significant amount of mountain biking trails and biking facilities within the Ben Lomond Reserve. Within the Ben Lomond Reserve, there is the Ben Lomond Trails, Wynyard Jump park, Fernhill Trails as well as a number of bike trails that are located up towards the Ben Lomond Saddle. These trails are widely considered to be some of the most prominent and most popular mountain biking trails in Queenstown and have international acclaim.

The Queenstown Hill Reserve is a relatively new area for the QMTBC. Back in 2021 we built a new pump track in the Queenstown Hill Reserve at the top of Kerry Drive. Our new pump track has proven to be a fantastic facility for events and of a huge benefit to young riders and progression riders alike. There is also a growing network of unofficial trails across Queenstown Hill Reserve that local riders have built and these have proven to be very popular trails within the local community.

With the popularity of mountain biking exploding locally and worldwide QMTBC is really interested in further developing the trails in both reserves to ensure we meet the growing demand for bike trails in Queenstown. Not only will these new trails help us raise the standard of riding here in Queenstown, it will enable us to host larger scale events and will help to further lift the status of Queenstown as an international riding destination.

In the Ben Lomond Reserve we wish to work with QLDC to expand the trail network to create more progressive trails and better connections between the two bike parks and the trails up towards the saddle. In the Queenstown Hill Reserve, we aim to further develop the new pump track on Kerry Drive to turn it into a thriving community space with something for everyone; by asphaltting the pump track and developing some dual slalom/jump lines. Once the pine felling has been completed on Queenstown Hill Reserve, we would like the opportunity to work with QLDC to plan and develop a new series of biking trails within the newly felled areas, tying in restoration and replanting with the new trail development.

QMTBC is in the later stages of updating our Trail Master Plan – where we outline the future developments we would like to complete in our current mountain biking areas and in areas we have the potential to develop in the future. This plan includes the Ben Lomond Reserve and Queenstown Hill Reserve. Our goal is to complete this plan and work with QLDC in linking our trail development plan with QLDC Trail Masterplan to ensure our plans are consistent and in alignment.

#### **QMTBC's Feedback on Specific Reserve Areas and Policies as outlined in the Draft Management Plan:**

##### **13.1.1 Wynyard Crescent Entrance:**

QMTBC supports the formalisation of the Wynyard Crescent entrance to improve parking and signage in the area.



### **13.1.2 Wynyard Jump Park:**

QMTBC supports the installation of water fountains, toilets, bike washdown area and additional signage. We support the idea of upgrading the 2 mile creek 4wd track as this would definitely help improve future access for maintenance and emergency services.

### **13.1.3 Fernhill Loop Trail:**

The QMTBC has identified an opportunity for a swing bridge (Skybridge) to be installed over the One Mile Creek on the Fernhill Loop Track. This Skybridge would provide easy access moving over the creek for both bikers and walkers and would better connect the Wynyard Jump Park to Midway.

### **13.1.4 Ben Lomond Mountain Bike Trails:**

Worth updating this section to reflect that QMTBC manages the Ben Lomond Trails? Would be good to further outline what QMTBC's responsibilities are in managing these trails going forward as there seems to be some overlap with QLDC.

QMTBC would like to formalise a more streamline process for new trail applications in the BLT area to enable us to better plan and budget in new trails each season. Part of the reason why there are so many pirate/unofficial trails in the area is due to the lack of new trail development in recent years. We are unsure how beneficial a bike up track would be in the longer term, as this has been tried in the past. A new up track would create more crossing points which could cause more issues. In winter most uphill traffic moves onto Hammies. As a club we can put out more messaging over the use of this track when the gondola is closed, and etiquette with the current construction traffic.

### **13.1.5 Midway Clearing:**

We support the idea of installing public toilets at Midway. It would also be great to better formalise and signpost the walking trail going up to Midway from one mile creek and from Midway up to Ben Lomond Saddle. We regularly see walkers going down some biking trails as they are not sure where to go.

Another consideration is to fell more trees around midway to allow for easier helicopter access.

Further tree removal around midway would also help to provide a firebreak and a safer open area in case of fire.

### **13.1.6 Tiki Trail and Upper Brecon Street Reserve Entrance:**

The Tiki Trail crosses over the lower part of Thundergoat which is the main exit trail for bikers going back to the Skyline Base Building. With a significant amount of biker traffic using that trail every day, it would be worth building a bridge/overpass so that walkers can cross Thundergoat without coming in close contact with bikers.

### **13.1.7 One Mile Reserve Entrance:**

QMTBC supports the building of a new dual use uphill trail to connect hikers and bikers up to Midway.

### **13.2 Te Tapunui Queenstown Hill:**

QMTBC supports Kerry Drive being the main entrance point to the Queenstown Hill Reserve. As part of our long term plan, we would like to asphalt the pump track in the future to make it a future



recreational area for scooters, skateboards and bikes. We also like to further develop the area with a dual slalom track and jump lines in the future.

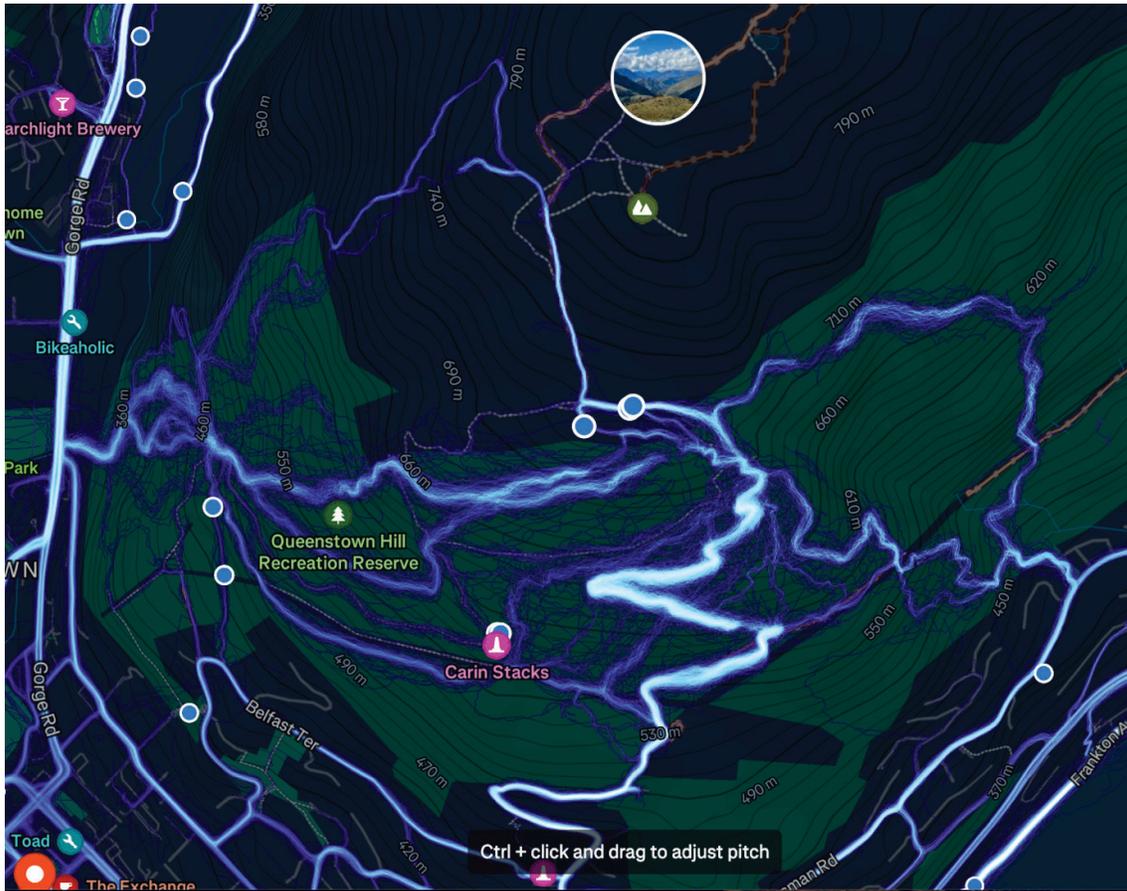
Queenstown Hill Reserve contains a significant network of unofficial/pirate trails that are popular and regularly ridden by locals. As the pine trees in the reserve are felled, QMTBC would like to work towards obtaining approval in legitimising these trails and/or building a new bike trail network within the reserve. The main entrance point to the trails is via Vancouver Drive and there is a well established uphill bike track that takes you up to the Basket of Dreams.

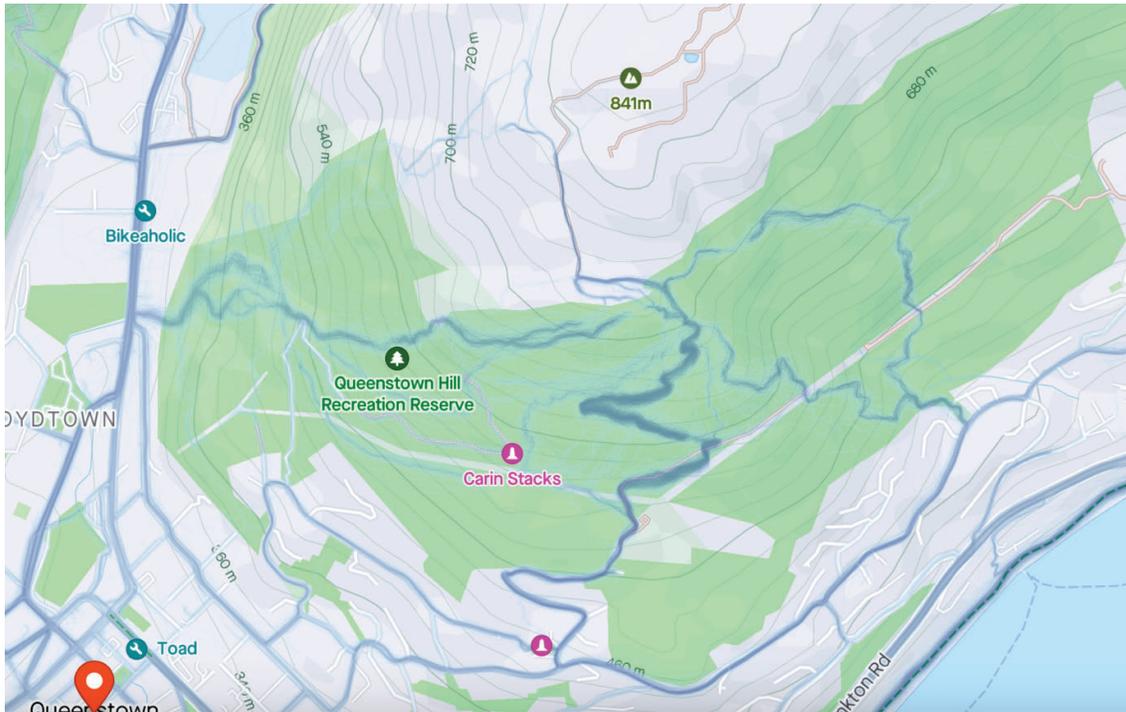
With cooperation from the Queenstown Hill Land owner there could be future opportunities to develop biking tracks that start higher up on Queenstown Hill and feed down into the Queenstown Hill Recreation Reserve area.

#### Holy Trail area:

This is one specific section of the Queenstown Hill Pirate Trails. It contains a series of unofficial downhill trails built within the pine forest that used to exit through the Church on Hallenstein Street, but now it's blocked off at the bottom with private land. There is one climbing trail that riders can use to get back out. There's potential to improve the climb trail and tidy up the pirate trails to form legitimate tracks in the future. All these tracks are built in the pine forest which is scheduled to be felled so work on this will start once the trees have been removed.

The following heat map from Strava visually outlines all the existing pirate trails in the Queenstown Hill Reserve and private land.





**13.2.2 Te Tapunui Queenstown Hill Time Walk:**

No feedback on this section

**13.3 Proposed Reserve Entrances:**

**13.3.1.1 :** QMTBC supports the new Lakeview entrance point, it would be good to have an uphill trail from Lakeview that would connect into the proposed uphill trail from Lomond Crescent. That way it would help create more entrances for uphill bike access into the BLT trails. As mentioned above, any new walking trail links that connect into the Tiki trail would need to take care to separate rider and walker traffic. Another bridge/overpass that separates walkers and downhill biker traffic would be ideal. Having a bike wash station at Lakeview entrance would be great as well.

**13.3.2:** QMTBC supports the Tree Tops Rise entrance point. One trail idea we have had for several years is to build a high level Frankton Link using the existing power line access road that runs along the side of Queenstown Hill above the residential areas.

Worth noting that the QLDC reserve area off Highview Terrace (that has the giant Sequoia) is regularly used as an exit by bikers out of the Queenstown Hill reserve area via riding an unofficial trail called Goats Head. It is also a popular entry point for hikers going up to Queenstown Hill. Both bikers and hikers use the lower section of the track, which is steep and slippery and the visibility up and down the trail is minimal. Therefore it would be worth QLDC looking at assessing this area in future as a possible entry/exit point into the reserve as it is already popular with locals.

**14.0 Policies:**

- **14.3 Natural Values / Hazards:**



QMTBC would like to be identified as a stakeholder in the process of felling the Queenstown Hill Reserve. QMTBC would like to legitimise/build a network of trails in the Queenstown Hill Reserve in the future so consideration of future trails and access would need to be included as part of the felling and replanting process.

- **14.5.23: Freedom Camping:**

It's worth noting that we have noticed some freedom camping occurring at Kerry Drive. They often drive in and park next to the pump track so are out of sight from the main parking area. Some removable bollards/fencing to prevent this would be helpful.

#### **14.6 Infrastructure and Reserve Development:**

- **14.6.6 Biking and Walking tracks:**

QMTBC supports the terms outlined in this section. QMTBC are working on a 3-5 year trail development plan and will liaise with QDLC in tying this in with QLDC's overarching Trail Masterplan.

Thank you very much for taking the time to read our submission. If you have any questions for us please contact us at [bikers@queenstownmtb.co.nz](mailto:bikers@queenstownmtb.co.nz)



## 79. Ollie Clements

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**From:** Ollie Clements  
**Sent:** Monday, 17 March 2025 4:39 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission

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Hi ,

Please see my submission below

Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission

Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort invested in developing the draft plan and acknowledge the community engagement undertaken so far.

I generally support the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access. However, I have significant concerns regarding specific aspects that require further consideration to better align with community interests and ensure improved outcomes for residents and visitors.

Below, I provide detailed feedback on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is quoted directly from the Draft Plan.

### **Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve**

*Unauthorised mountain biking tracks have also been developed with the....*

The term "unauthorised" has a specific legal implication under the Reserves Act 1977, which does not entirely align with its use here. I recommend reconsidering the wording for greater accuracy.

Additionally, the Draft Plan underrepresents the significance of the mountain bike (MTB) trail network within Queenstown Hill Reserve. Strava heat maps show these trails have existed for over 20 years and are well-established.

Queenstown Hill Reserve is one of only three all-season, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). Its natural features and proximity to the town center make it an internationally significant MTB destination.

The Draft Plan should more accurately acknowledge the current use of the reserve by mountain bikers. While recognizing that these trails are ‘unsanctioned’ or ‘unofficial,’ the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be included in Section 13.2. Ignoring this established trail network due to resource limitations is not a viable long-term strategy.

This revision would align the Draft Plan with the existing (2005) Reserve Management Plan, which permitted mountain biking with restrictions near the Time Walk track and required MTB use to be limited to designated and approved trails. Additionally, this approach aligns with the reserve’s classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

This phrasing implies that the removal of exotic species in Ben Lomond is inevitable. While community engagement has shaped the Draft Plan, the broader community may not fully support this assumption. The public backlash following damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve highlights strong community sentiment regarding tree removal.

Additionally, assuming that bike trails will remain viable post-deforestation is problematic. Trail sustainability is closely tied to tree cover, which stabilizes steep terrain and maintains suitable soil conditions. The Draft Plan should acknowledge these challenges.

#### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.*

This section lacks the qualifying statements found in Section 14.3.2, which proposes a staged removal process followed by revegetation. Why is immediate action prioritized for the Queenstown Hill Forestry Plan without a similarly balanced approach?

The plan must also consider the unintended consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, phased approach integrating revegetation efforts is necessary to prevent ecological and landscape degradation.

#### **Section 14.6.9 – Biking & Walking Tracks**

*Remove and rehabilitate unauthorised tracks and trails.*

The Draft Plan does not acknowledge that many of Queenstown's most popular and well-used MTB trails began as 'unauthorised' tracks. Instead of a blanket removal policy, an amnesty should be considered to assess and integrate well-established trails into the official network where appropriate.

A collaborative approach with the MTB community would encourage greater acceptance of formalizing certain trails while decommissioning others. A rigid stance risks alienating a key user group and undermining long-term compliance.

### **General Comments**

The Draft Plan prioritizes wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced assessment is needed to weigh the financial and environmental costs of removal against alternative management strategies.

Key considerations missing from the Draft Plan include:

- **Slope Stability & Natural Hazard Mitigation:** The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions, making them potentially unaffordable for the community.
- **Historical and Aesthetic Value:** Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown's identity.
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### **Conclusion**

As a long-term resident and frequent user of both reserves, I urge the Draft Plan to take a more balanced approach. Queenstown's world-class mountain biking network has thrived within these established forests because they provide an environment conducive to sustainable trails.

A comparison of deforested MTB trails versus those within forested areas reinforces this point. The Coronet Peak trails, which exist outside a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.

If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.

Yours sincerely,

Ollie Clements

## 89. Sam Bates

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**From:** Sam Bates  
**Sent:** Monday, 17 March 2025 7:05 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission

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### **Conclusion**

As a long-term resident and frequent user of both reserves, I urge the Draft Plan to take a more balanced approach. Queenstown's world-class mountain biking network has thrived within these established forests because they provide an environment conducive to sustainable trails.

A comparison of deforested MTB trails versus those within forested areas reinforces this point. The Coronet Peak trails, which exist outside a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.

If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.

Yours sincerely,

Sam Bates

---

**From:** Sara Bradley  
**Sent:** Monday, 17 March 2025 9:57 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Queenstown hill management plan public submission

Hi,

Please see my submission below regarding this plan submission.

**Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan Submission.**

Thank you for the opportunity to provide feedback on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I appreciate the effort that has gone into developing the draft plan and acknowledge the community engagement undertaken to date.

I am generally supportive of the objectives and policies outlined in the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan (Draft Plan), particularly those aimed at enhancing recreational facilities and improving access to the Reserves. However, I have significant concerns regarding specific aspects of the Draft Plan that require further consideration to better align with community interests and ensure improved outcomes for both residents and visitors.

Below, I provide detailed commentary on selected sections of the Draft Plan, referencing relevant excerpts from the document. Text in italics is taken directly from the Draft Plan.

**Section 8.2 – Description of Primary Users and Activities – Te Tapunui Queenstown Hill Reserve**

*Unauthorised mountain biking tracks have also been developed with the....*

The term “unauthorised” carries a specific legal connotation under the Reserves Act 1977

that does not fully align with its use in this context. The wording should be reconsidered to ensure clarity.

Additionally, the Draft Plan appears to downplay the existence and significance of the mountain bike trail (MTB) network within Queenstown Hill Reserve. These trails, as evidenced by Strava heat maps, have been in place for over 20 years and are well-established.

Queenstown Hill Reserve is one of only three all-year, all-weather mountain biking areas accessible from Queenstown, alongside Ben Lomond Reserve and 7-Mile (currently undergoing deforestation). The natural features and proximity to the town center make this MTB area internationally significant.

The Draft Plan should be updated to accurately reflect the current use of the Reserve by mountain bikers. While acknowledging that these trails are ‘unsanctioned’ or ‘unofficial,’ the plan should prioritize collaboration with the MTB community to formalize and manage them appropriately. New objectives and policies specific to MTB trails on Queenstown Hill should be incorporated into Section 13.2. Ignoring this well-established trail network due to resource constraints is not an acceptable long-term strategy.

Such revisions would align the Draft Plan with the existing (2005) Reserve Management Plan, which provided for mountain biking with restrictions near the Time Walk track and a requirement that MTB use be limited to formed and approved trails. Additionally, this approach would be consistent with the Reserve’s classification under the Reserves Act as a Recreation Reserve, which allows for recreational tracks and activities.

#### **Section 13.1.4 – Ben Lomond Bike Trails**

*Consideration will have to be given to the bike trail network when the vegetation removal occurs.*

This wording suggests that the removal of exotic species in Ben Lomond is inevitable. While community engagement has guided the Draft Plan, the broader community may not fully support this assumption. The backlash following the damage to Queenstown Cemetery due to forestry operations in Ben Lomond Reserve demonstrates strong community sentiment regarding tree removal.

Furthermore, the assumption that bike trails can be maintained post-deforestation is flawed. The presence of trails is intrinsically linked to the established tree cover, which stabilizes steep terrain and maintains suitable soil conditions for trail sustainability. The Draft Plan should acknowledge these challenges.

#### **Section 14.3.1 – Landscape Protection Forestry**

*Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas Fir.*

This section lacks the qualifying statements found in Section 14.3.2, which outline a staged approach followed by revegetation efforts. Why does the Queenstown Hill Forestry Plan require immediate action without a similarly balanced approach?

The plan must consider potential negative consequences of rapid deforestation, such as the proliferation of other invasive species. A strategic, staged approach that integrates revegetation efforts is necessary to avoid unintended ecological and landscape degradation.

## Section 14.6.9 – Biking & Walking Tracks

*Remove and rehabilitate unauthorised tracks and trails.*

The Draft Plan fails to acknowledge that many of Queenstown’s best and most frequently used MTB trails began as ‘unauthorised’ trails. Instead of blanket removal, an amnesty should be considered to incorporate well-established tracks into the official network where appropriate.

A collaborative approach with the MTB community would result in higher acceptance of formalizing some trails while decommissioning others. An overly rigid stance risks alienating a key user group and undermining compliance efforts.

### General Comments

The Draft Plan leans heavily toward wilding conifer removal at the expense of recreational and community benefits. While wilding control is important, a balanced discussion is required to assess the financial and environmental costs of removal against alternative management strategies.

Key considerations missing from the Draft Plan include:

- **Slope Stability & Natural Hazard Mitigation:** The steep, geologically unstable terrain benefits from tree cover, which stabilizes the hillsides and protects communities below from rockfall and landslides. The cost of engineered rockfall barriers could reach tens of millions of dollars, which may be unaffordable for the community.
- **Historical and Aesthetic Value:** Two generations of residents have only ever known these reserves as forested landscapes, making them an iconic part of Queenstown’s identity.
- **Economic Considerations:** The Draft Plan acknowledges the economic benefits of mountain biking but does not address the financial impact of removing MTB trails or forested areas. Research estimates MTB visitor spending could reach \$210 million annually by 2026, rivaling ski tourism.
- **Trail Sustainability & User Experience:** Established trees provide shade, reduce freeze-thaw damage, minimize erosion, and maintain trail integrity. Without them, trails would become seasonally unusable, increasing maintenance costs and reducing Queenstown’s attractiveness as a year-round MTB destination.
- **Carbon Sequestration:** These forests capture tens of thousands of tonnes of carbon annually. Removal would result in significant carbon emissions, taking decades to offset even with replanting efforts.
- **Regulatory Flexibility:** The Otago Regional Council Pest Management Plan classifies wilding conifers under progressive containment rather than requiring full eradication. A managed retention strategy could be considered instead of wholesale removal.

### Conclusion

As a long-term resident and frequent user of both reserves, I urge the Draft Plan to adopt a more balanced approach. Queenstown's world-class mountain biking network has flourished within these established forests because they provide an environment conducive to sustainable trails.

Comparing deforested MTB trails to forested ones highlights this point. The Coronet Peak trails, which exist outside of a forested area, are unrideable for half the year due to freeze-thaw cycles, require extensive annual maintenance, and cannot be ridden in wet conditions. If forests are removed, Queenstown will lose its reputation as a premier all-weather, year-round MTB destination, resulting in significant economic losses.

If the cost of containing wilding spread from Ben Lomond and Queenstown Hill is lower than the benefits of retaining selected forested areas, then maintaining these trees—amongst vast expanses of sub-alpine tussockland—should be considered a viable option.

Yours Sincerely,

Sara Bradley

93. Skyline Enterprises Limited

**SUMMISSION ON DRAFT TE-TAUMATA-O-HAKITEKURA BEN LOMOND AND TE TAPANUI  
QUEENSTOWN HILL RESERVE MANAGEMENT PLAN**

**To:** Queenstown Lakes District Council – Parks Department

**Submitter Details:**

**Name of submitter:**

Skyline Enterprises Limited

**Address for Service:**

Skyline Enterprises Limited  
C/- Southern Planning Group  
PO BOX 1081  
QUEENSTOWN 9348

Attention: Sean Dent  
[sean@southernplanning.co.nz](mailto:sean@southernplanning.co.nz)  
021 946 955

17 March 2025

## Introduction

1. This submission is made on behalf of Skyline Enterprises Limited (**the submitter**) regarding the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapanui Queenstown Hill Reserve Management Plan (**the management plan**).
2. The submitter wishes to be heard at the hearing for the draft management plan.
3. The submitter is a lease holder over parts of the Ben Lomond Recreation Reserve (**BLRR**) and operates the well-known commercial tourism business comprising of the Skyline gondola, lower terminal, and restaurant building.
4. The submitter's existing lease arrangements also include the area around the restaurant building containing the two existing luge tracks with associated chair lift and scenic amenities. A lease also exists for a 394-space car park building that has recently been constructed behind the lower terminal building on Brecon Street.
5. The submitter also holds approvals for guided walks to the Ben Lomond summit originating from their lease area atop Bob's Peak<sup>1</sup>.
6. The submitter and their commercial facilities in the BLRR serve as an 'anchor tenant' with their car park, and gondola access in particular providing access not only to their facilities, but to the other commercial operators who have established on the periphery of their lease on Bob's Peak including Ziptrek, AJ Hackett Bungy, and GForce Paragliding.
7. Collectively, these operators and their built form located atop Bob's Peak form a recognised recreation and tourism hub. The submitter's facilities on Bob's Peak have existed and developed in this location for decades and comprise a well-recognised element within the landscape.
8. These facilities, and particularly the submitter's gondola, facilitates recreational use and enjoyment of the wider BLRR by providing access for walking, mountain biking, scenic viewing, paragliding and bungy jumping. Their lease is a staging area for the commencement of these recreational activities and the submitter sees 800,000 – 900,000 gondola passengers annually<sup>2</sup>.
9. It is therefore important that these developed areas (and appropriate area(s) for expansion) in the BLRR are recognised in the draft management plan and that their continued use and development is provided for. These areas and the facilities provided within provide high recreational and sightseeing values for locals and tourists alike and they should be valued as an 'icon destination' in the reserve management plan.
10. An 'Icon Destination' is a term that has been used by the Department of Conservation (**DOC**) in the development of their management planning documents and has been described as follows:

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<sup>1</sup> QLDC resource consent RM210598 and DOC Concession 94891-GUI

<sup>2</sup> Direct consultation between Sean Dent and Geoff McDonald, CEO Skyline Enterprises Limited.

*"Icon Destinations form the backbone to the New Zealand tourism product for overseas tourists and New Zealanders. They are the 'must see' places that provide memorable experiences.*

*DOC's proposed Icon Destinations will provide quality experiences that complement other destinations managed by other agencies or businesses. Together these icon places complete the tourism attractions of New Zealand".*

11. Icon Destinations are high-profile, popular destinations that DOC manages to support the growth of domestic and international tourism and provide memorable visitor experiences in New Zealand<sup>3</sup>.
12. Recognising and providing for the continued operation and development of the submitter's facilities (and those adjacent commercial recreation activities) as an Icon Destination is considered consistent with the principal purpose of Recreation Reserves as specified below:

*"It is hereby declared that the appropriate provisions of this Act shall have effect, in relation to reserves classified as recreation reserves, for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside."*<sup>4</sup>

13. Equivalent alternative terminology to an icon destination could also be used within the Reserve Management Plan and which is not a DOC management planning term. With the intent being to recognise and protect the established valuable tourism and recreation resource. With the above background, the submitters comments on the draft reserve management plan are discussed below.

## **Comments on the Draft Management Plan**

### Commercial Recreation Use and Development

14. The draft management plan has omitted reference to some key matters regarding commercial recreation use and development within the BLRR.
15. First, at Section 11 – *Planned Commercial Recreation Developments*, the description of the submitter's upgrades has left out a significant part of their development project.
16. Specifically, in addition to the replacement of the gondola, the upper and lower gondola terminals, and the construction of new car park building, the development

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<sup>3</sup> Westland Tai Poutini National Park Management Plan 2001 – Amended 2014, Section 1.3.11.1(e) - Intense Interest Sites, page 33.

<sup>4</sup> Reserves Act 1977, Section 17(1).

project encompasses a substantial expansion of the existing restaurant building on Bob's Peak.

17. As outlined in evidence to the Environment Court during the Direct Referral of the submitter's resource consent, the following changes in gross floor area will occur to the restaurant building as a result of its eastward extension and re-building of the existing restaurant building:

*Existing*

- Basement including theatre excluding the 'cave' 526m<sup>2</sup>
- Ground floor (restaurant level) including gondola terminal 2,100m<sup>2</sup>
- First floor (function level) not including decks 1,360m<sup>2</sup>

*Proposed*

- Basement including theatre excluding the 'cave' 1,220 sq.m<sup>2</sup>
- Ground floor (restaurant level) including gondola terminal 3,700 m<sup>2</sup>
- First floor (function level) not including decks 3,345m<sup>2</sup>

18. This is a substantial part of the overall development project and should be recognised in the management plan.
19. Second, when QLDC initiated Stage 1 of its Proposed District Plan (**PDP**) in August 2015, the submitter participated in the submissions and hearings process and recommended a 'Commercial Tourism and Recreation Sub-Zone' be applied over the Bob's Peak facilities, the Gondola cableway corridor and also encompassing the lower terminal building site and car parking area at the northern end of Brecon St as opposed to the Rural General Zone.
20. This submission was largely 'adopted' and incorporated into QLDC's Stage 2 PDP review whereby the submitter's facilities were encapsulated within the PDP's Open Space and Recreation Chapter, Informal Recreation Zone and the Ben Lomond Sub-Zone. However, amendments were still sought to the PDP maps to extend the Ben Lomond Sub-Zone and facilitate an area to the west of the submitter's current lease area for future commercial recreation development. This western expansion was supported by Council's landscape architect in the PDP Stage 1 (Dr Marion Read) and by the submitter's landscape architect (Michelle Snodgrass) in the PDP Stage 2 hearings.
21. This expansion of the Ben Lomond Sub-Zone to the west was not approved in Council's decision on Stage 2 of the PDP and has been appealed to the Environment Court<sup>5</sup>. This appeal, and another lodged by Ziptrek<sup>6</sup> have been placed 'on-hold' pending the outcome of the BLRR management plan review.

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<sup>5</sup> ENV-2019-CHC-043

<sup>6</sup> ENV-2019-CHC-030

22. Despite these Environment Court appeals being dependent on the outcome of the BLRR management plan review, Section 11 of the draft management plan is silent on this key issue. Plans of the submitter's proposed PDP zone and that approved in the decisions version of the PDP are attached as **Appendix [A]**.
23. It is submitted that in recognition of the Icon Destination status and the desirability to provide for sensitively located future development opportunities that foster commercial recreation and domestic and international tourism, the Council should identify this area of development expansion into the management plan such that it will signal an appropriate area for future development that can maintain the landscape values of the receiving environment and maintain the spectacular alpine backdrop<sup>7</sup> to Queenstown. The plan in **Appendix [A]** could be adopted or suitably amended and included as Appendix 4 to the management plan.
24. Accepting this as area appropriate for future development of new recreation activities or expansion of existing commercial recreation facilities could then result in a consequential change to Policy 14.5.10 by adding a new point (e) that states:

*14.5.10 Consider the granting of new commercial lease or license agreements, or the renewal of existing lease and license agreements, that:....*

*(e) Are located within the Bob's Peak future development area identified in Appendix 4.*

#### Section 12 - Objectives

25. ; Objective 12.15 promotes the development of built structures to support recreation use on the BLRR. It is submitted that this should promote such structures for both commercial and informal recreation and be re-worded as follows:

*12.15 To promote built structures that support both the commercial and informal recreation uses of the reserves and that positively contribute to the reserve amenity and provide public benefit.*

26. The management plan is supportive of providing new or diversified recreation opportunities and the submitter supports this however and noting the comments above about Bob's Peak being an Icon Destination, it is submitted that there is no Objective which sets a desirable outcome of providing for the on-going operation, use and diversification of the existing commercial recreation operations. It is submitted that the following should be added as a new Objective:

*12.18 To provide for the ongoing operation, use, and diversification of the existing commercial recreation operators on Bob's Peak in recognition of their strategic importance to the Districts tourism industry.*

27. Similarly, it is considered that Policy 14.5.2 should have a new point (e) added such that it reads as follows:

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<sup>7</sup> Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapanui Queenstown Hill Reserve Management Plan, Introduction, page 3, paragraph 3.

14.5.2 Provide for and manage the impacts of recreational use through a range of mechanisms, including, but not limited to:.....

- (e) Provide for the continued operation, potential future replacement, or upgrade, and diversification of the use of the established commercial recreation facilities on Bob's Peak.

#### Wildfire Risk

28. The risk of wildfire and the potential for closure of the BLRR is considered a major impediment to management of an Icon Destination site and the submitters commercial facilities in the BLRR and yet this issue appears to be very minimally addressed in the draft management plan.
29. Specifically, Section 9.3 – *Wildfire Risk* comprises three paragraphs and does not identify what the overall intention is toward management of this risk i.e. is it to maintain the status quo with potentially increasing numbers of days of closure of the BLRR in accordance with the QLDC Wildfire Reserve Closure Plan or is it to proactively reduce the risk of wildfire by expediting the removal of wilding conifers?
30. The submitter considers that this section of the BLRR requires some clear direction and would support the latter, proactive approach of reducing the wildfire risk by expediting the wilding conifer removal.
31. It is also submitted that given the substantial development that exists, and which is currently being undertaken atop Bob's Peak and the substantial number of visitors to this area, that Section 9.3 should identify that a priority action towards mitigating fire risk and providing a safe space for reserve users should there be a wildfire, is to establish a fire break around the commercial recreation facilities on Bob's Peak.
32. It is submitted that to address these concerns the following is necessary:
- (a) A new Objective in Section 12 that states:  
  

*"To reduce the risk of wildfire by expediting the harvest and removal of wilding conifers in the Te-Taumata-o-Hakitekura Ben Lomond Recreation Reserve"*
  - (b) Amend Policy 14.3.11 to state:  
  

"Allow for reserve closures *other than the Bob's Peak Business Operators* to mitigate risk for reserve *users in accordance with the QLDC Wildfire Reserve Closure Plan and the Bob's Peak Operators Voluntary Wildfire Summer Plan including any subsequent variations and revisions as approved by FENZ.*"
  - (c) Add a new Policy (Policy 14.3.13) that states:  
  

*"Implement a firebreak around the existing commercial leases in the Ben-Lomond Sub-Zone on Bob's Peak".*

33. Implementing the above changes will give effect to agreements that have been reached between QLDC, Fire and Emergency New Zealand (**FENZ**), the submitter and other Bob's Peak Business Operators for the 2024/2025 summer including a voluntary Wildfire Summer Plan. A copy of the Bob's Peak Operators Voluntary Wildfire Summer Plan and the QLDC agreement of the same is attached as **Appendix [B]**.
34. These agreements essentially enable the submitters facilities (and those of Ziptrek, AJ Hacket, and GForce) to remain open during Phase 2 and 3 fire risk categories on the basis that a maximum capacity of 1,700 people at the submitters facilities is maintained (along with other passive controls on reserve access).
35. The above number has been agreed with FENZ and QLDC following demonstrated evacuations where limits of 700 people can be evacuated by gondola in 20 minutes and 1,000 people can be evacuated to a safe space (**the bunker**) within the submitters building in 20 minutes – this being the critical time period for a fire at the toe of the slope to reach Bob's Peak.
36. These agreements are more recent than the QLDC Wildfire Reserve Closure Plan<sup>8</sup> and the drafting of this draft management plan<sup>9</sup> and it is submitted are more relevant to rely on for the provisions of this management plan.
37. Indigenous Biodiversity and Forestry Activities
38. Section 7 – *Ecological History and Management* in the draft management plan discusses several key issues.
39. Section 7.1 discusses that ecological significance within BLRR can be improved through potential restoration, preservation and enhancement of natural values and in particular, the areas or remnant forest. Restoration is suggested to occur through reforestation or low flammability native species and a mix of non-invasive exotics.
40. The submitter supports the intention of enhancing the flora and fauna values of the BLRR subject to the additional comments below.
41. In Section 7.4, the effects of the invasive nature of the Dougla Fir trees are outlined and their effects on landscape, ecological and cultural values are acknowledged. Removal of these trees is considered necessary, and the submitter strongly supports this, but it is noted that a revegetation strategy is outlined as being essential<sup>10</sup> to replace the tree canopy.

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<sup>8</sup> QLDC Wildfire Reserve Closure Plan Version 2, dated 8 October 2024.

<sup>9</sup> Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapanui Reserve Management Plan, submitted to Community & Services Committee 12 November 2024.

<sup>10</sup> Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapanui Queenstown Hill Reserve Management Plan, Section 7.4, page 7, paragraph 7.

42. The submitter agrees that a replacement tree canopy is necessary for landscape, natural hazard, stormwater and recreation management. However, it is submitted that if this is an essential requirement to removing the wilding conifers and given the impacts on the key issue of wildfire risk, the revegetation strategy should be developed and consulted on as part of this wider management plan review as the issues and outcomes are interconnected.
43. Following on from the above comments in Section 7, the submitter is generally supportive of Policies for biodiversity at 14.3.5 – 14.3.7 that seek identification and protection of existing areas of native vegetation and the development of ecological restoration programmes.
44. However, it is submitted that Policy 14.3.7(b) needs to be amended such that restoration programmes do not target the areas adjacent to the Gondola and restaurant facilities nor the gondola operating Easement. As discussed above, it is submitted that a firebreak needs to be implemented around these facilities immediately and even native vegetation can be flammable and must maintain a safe distance from the submitter's facilities.
45. In regard to forestry, Policy 14.3.2 requires development of a forestry management plan for the BLRR that requires a staged approach to Douglas Fir removal, followed by a revegetation programme.
46. The existing forestry management plan for the BLRR was developed in 2006 and it is submitted that this is now outdated and not fit for purpose. This is an important document in being able to remove the Douglas Firs and it is submitted that development of a forestry management plan be required within a set period of time i.e. 12 months. Leaving the Policy open ended as to timing means that development of this document could be years away.
47. As already noted above, it is submitted that a revegetation strategy must be developed now, as part of this review process given that the vegetation cover for the reserve affects several key issues and characteristics (landscape, biodiversity, wildfire, and other natural hazards, and recreation (mtb trails) of the reserve.
48. Policy 14.3.3(a) also specifies that forestry management plans need to consider having minimal impact on amenity values through use of low impact extraction methods. Low impact extraction methods are not identified but it is assumed that this may include options such as heli-logging which have less landscape effect i.e. tracking and earthworks.
49. It is submitted that this Policy may not result in an expedient or cost-effective approach to removal of the conifer trees. The site is a very difficult site to work within and while landscape/amenity values are important to preserve, it is submitted that the temporary landscape and visual amenity effects of an efficient and cost-effective forestry operation (followed by a suitable revegetation process) is preferable over a slow extraction process that doesn't resolve quickly the wildfire risk in the reserve. Policy 14.3.3(a) should be replaced as follows:

14.3.3 Recognise that forestry plans need to consider:

(a) Expediting the removal of conifer trees in Te Taumata-o-Hakitekura Ben Lomond Reserve to reduce the risk of wildfire to reserve users.

(b) Minimal impact on amenity values through the use of low impact extraction methods, where practicable, while recognising the long-term goal of restoring the natural environment and enhancing biodiversity values.

#### Other Matters

50. There are some minor other matters that the submitter wishes to comment on as follows.
51. Appendix 1 – Reserve Map does not appear to accurately reflect the lease areas on the BLRR. Specifically, the applicant's lease for the car park behind the lower terminal on Brecon Street of some 8,532m<sup>2</sup> does not appear to be illustrated.
52. Similarly, the leases to GForce Paragliders, and AJ Hackett Bungy that are directly adjacent to the submitters lease are not referenced – this may be due to the scale of the map, but they are key leaseholders and should be identified.
53. Section 7.5 discusses pest animals and notes that feral goat numbers are steadily increasing and have a significant impact on native biodiversity and that goat control will play an important part of any revegetation programme.
54. The submitter acknowledges this is a major issue and will be an impediment to any revegetation strategy. This has been discussed with Council staff in the past through the submitters resource consent proposal for a new luge chair lift where landscaping was required and Council staff suggested that “they might just have to keep replanting the landscaping” – on account of the goat issue.
55. It is respectfully submitted that development of a revegetation strategy for conifer removal needs to be developed in accordance with a comprehensive goat control plan as surely the Council does not want to keep replanting any areas of restoration planting.
56. There is very little detail in the draft management plan as to what goat control might be other than collaborating with adjacent landowners/administrators to co-ordinate efforts. This appears to be implementing the status quo, and it is submitted that this isn't sufficient to realise the Objectives (12.4) and goals of the draft management plan for a replacement tree canopy and restoration of biodiversity values.
57. It is recognised that in an unfenced reserve, pest control will always be 'holding the line' against continued re-invasion. However, more direction on the frequency/intensity of ground control operations to achieve the plans outcomes would be beneficial.

#### Grazing Licences

58. The submitter strongly supports Policy 14.5.2.1 which seeks to enable the granting of a licence(s) for grazing to prevent re-invasion of wilding conifers where it does not impede regeneration of native biodiversity.
59. Grazing of areas that have been subject to wilding conifer removal, either on a short- or long-term basis, to prevent re-invasion of wilding species and keep these areas managed to reduce wildfire risk (i.e. from unkempt grass growth) is considered a low impact and cost effective way to manage large areas of land in the reserves that are otherwise not utilised.
60. It would also be an appropriate management control in the BLRR within the submitter's easement for the gondola corridor where no vegetation is desirable, and the adjacent land containing the power lines where again, vegetation is not desirable, and wilding conifers have recently been removed.
61. It is noted that such activities are enabled through Sections 71 and 72 of the Reserves Act 1977 and maintaining this Policy in the management plan is therefore entirely consistent with the Act.

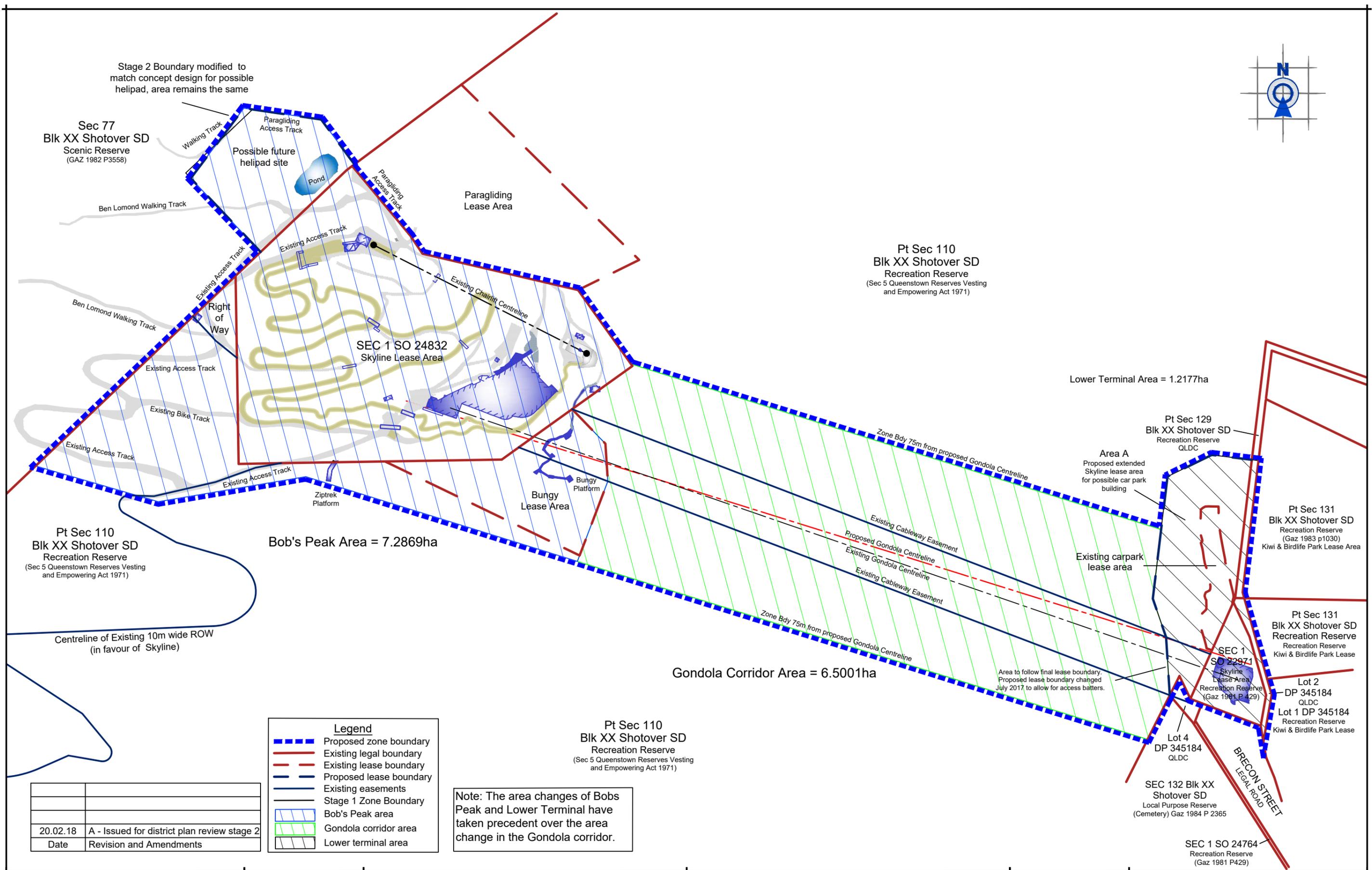
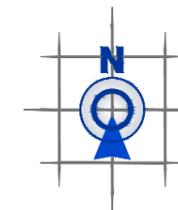
### **Conclusion**

62. As noted above, the submitter generally supports the draft management plan subject to implementing the clarifications and additional information outlined in the above paragraphs. The submitter seeks any other consequential, related, or necessary additional relief to that set out above, and in order to give effect to the objectives stated in this submission.
63. The submitter wishes to be heard in support of their submission.
64. If other make a similar submission, the submitted will consider presenting a joint case with them at a hearing.



Sean Dent on behalf of Skyline Enterprises Limited

# Appendix [A]



Stage 2 Boundary modified to match concept design for possible helipad, area remains the same

Sec 77  
Blk XX Shotover SD  
Scenic Reserve  
(GAZ 1982 P3558)

Pt Sec 110  
Blk XX Shotover SD  
Recreation Reserve  
(Sec 5 Queenstown Reserves Vesting  
and Empowering Act 1971)

SEC 1 SO 24832  
Skyline Lease Area

Bob's Peak Area = 7.2869ha

Lower Terminal Area = 1.2177ha

Pt Sec 110  
Blk XX Shotover SD  
Recreation Reserve  
(Sec 5 Queenstown Reserves Vesting  
and Empowering Act 1971)

Pt Sec 129  
Blk XX Shotover SD  
Recreation Reserve  
QLDC

Pt Sec 131  
Blk XX Shotover SD  
Recreation Reserve  
(Gaz 1983 p1030)  
Kiwi & Birdlife Park Lease Area

Pt Sec 131  
Blk XX Shotover SD  
Recreation Reserve  
Kiwi & Birdlife Park Lease

Pt Sec 110  
Blk XX Shotover SD  
Recreation Reserve  
(Sec 5 Queenstown Reserves Vesting  
and Empowering Act 1971)

Lot 2  
DP 345184  
QLDC  
Lot 1 DP 345184  
Recreation Reserve  
Kiwi & Birdlife Park Lease

SEC 132 Blk XX  
Shotover SD  
Local Purpose Reserve  
(Cemetery) Gaz 1984 P 2365

SEC 1 SO 24764  
Recreation Reserve  
(Gaz 1981 P429)

Centreline of Existing 10m wide ROW  
(in favour of Skyline)

Legend	
	Proposed zone boundary
	Existing legal boundary
	Existing lease boundary
	Proposed lease boundary
	Existing easements
	Stage 1 Zone Boundary
	Bob's Peak area
	Gondola corridor area
	Lower terminal area

Note: The area changes of Bobs Peak and Lower Terminal have taken precedent over the area change in the Gondola corridor.

Date	Revision and Amendments
20.02.18	A - Issued for district plan review stage 2

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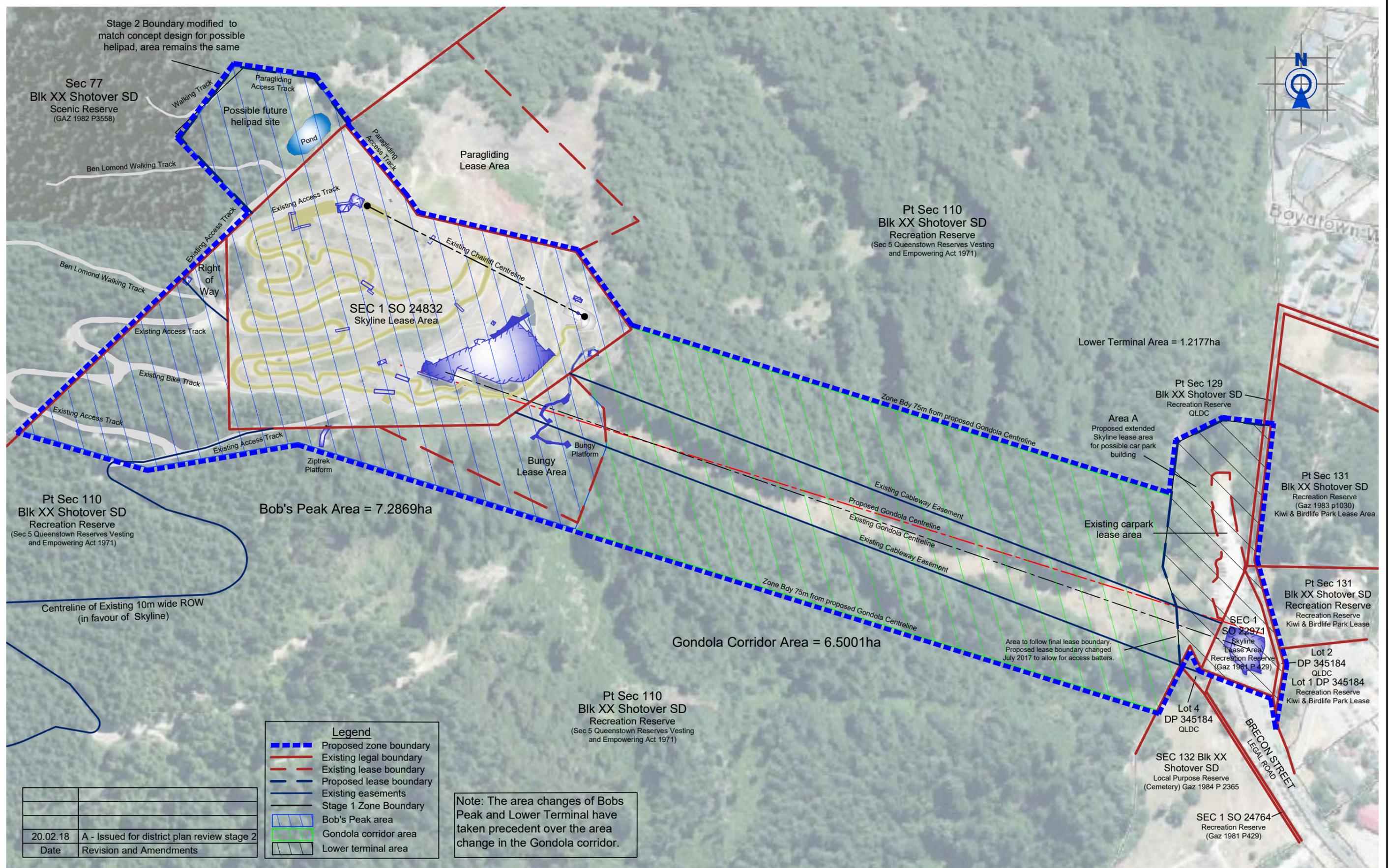
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Client/Location:  
**SKYLINE ENTERPRISES LIMITED**  
53 BRECON STREET, QUEENSTOWN

Purpose/Drawing Title:  
**PROPOSED DISTRICT PLAN STAGE 2  
PROPOSED COMMERCIAL RECREATION  
AND TOURISM SUB-ZONE BOUNDARY**

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Checked by:	SM Feb 2018	<b>DO NOT SCALE</b>	
Approved by:		Sheet No:	Revision No:
Job No:	Q4115J - 14	23	A
		Date Created:	20/02/2018



**Legend**

- ▬▬▬▬ Proposed zone boundary
- ▬▬▬▬ Existing legal boundary
- - - - Existing lease boundary
- ▬▬▬▬ Proposed lease boundary
- ▬▬▬▬ Existing easements
- ▬▬▬▬ Stage 1 Zone Boundary
- ▨▨▨▨ Bob's Peak area
- ▨▨▨▨ Gondola corridor area
- ▨▨▨▨ Lower terminal area

Note: The area changes of Bobs Peak and Lower Terminal have taken precedent over the area change in the Gondola corridor.

Date	Revision and Amendments
20.02.18	A - Issued for district plan review stage 2

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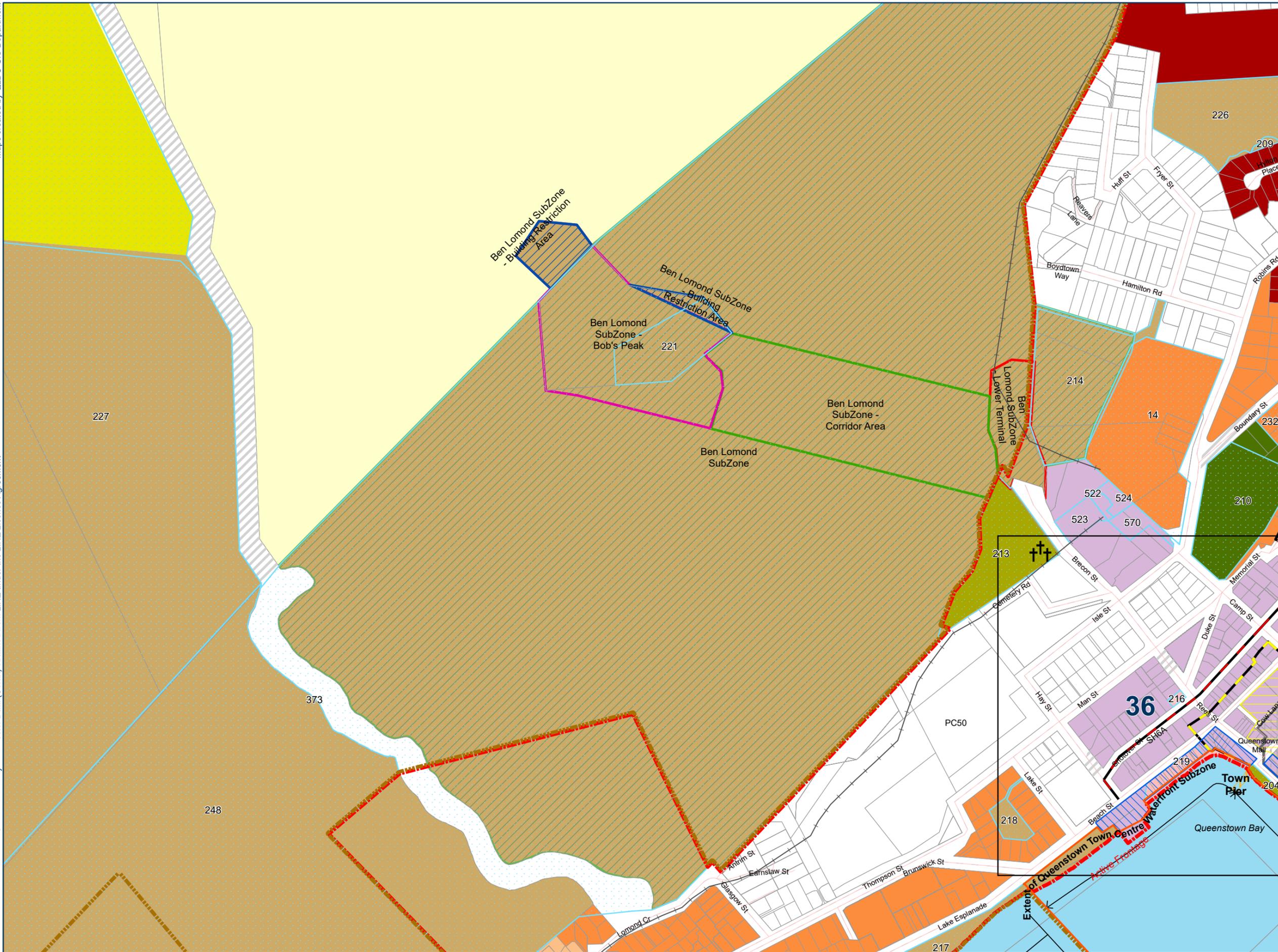
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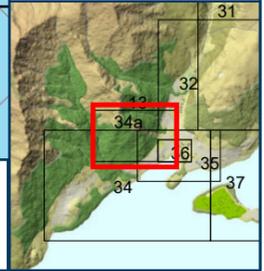
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- Legend**
- †† Open Cemetery
  - Aurora Distribution Lines – For Information Only
  - Roads
  - State Highway
  - Queenstown Waterfront Zone
  - Parcel/Road Boundary
  - Landscape Classification (ONF, ONL, RCL)
  - Urban Growth Boundary
  - Unformed Roads
  - Designated Areas
  - Building Restrictions
  - Town Centre Entertainment Precinct
  - Town Centre Special Character Area
  - Town Centre Transition Sub-Zone
  - Town Centre Town Pier
  - Historic Heritage Precinct
  - Ben Lomond Sub-Zone
  - Ben Lomond Sub-Zone - Building Restriction Area
  - Ben Lomond Sub-Zone - Bob's Peak
  - Ben Lomond Sub-Zone - Corridor Area
  - Ben Lomond Sub-Zone - Lower Terminal
  - Community Purpose - Cemetery
  - Business Mixed Use
  - Active Sports and Recreation
  - Civic Spaces
  - Community Purposes
  - Informal Recreation
  - Nature Conservation
  - Queenstown Town Centre
  - High Density Residential
  - Medium Density Residential
  - Lower Density Suburban Residential
  - Rural
  - Water (zone Rural unless otherwise shown)

34a



# **Appendix [B]**

12 December 2024

James Knapp  
Community Risk Manager, Otago  
Fire Emergency New Zealand  
By email: [James.Knapp@fireandemergency.nz](mailto:James.Knapp@fireandemergency.nz)

Dear / Tēnā koe James,

**Re: FENZ position in relation to Ben Lomond Reserve (Bob's Peak) fire risk for the 2024/25 season**

Queenstown Lakes District Council (QLDC) would like to thank Fire and Emergency New Zealand (FENZ) for their support over the last few months partnering on the Ben Lomond wildfire prevention program.

This letter accepts the arrangement between FENZ and the Ben Lomond Commercial Businesses Stakeholders as detailed in the 'Bobs Peak Business Operators Voluntary Wildfire Activity and Access Controls 241022' and your letter dated 29<sup>th</sup> November 2024 (attached).

QLDC would like to acknowledge FENZ's leadership role in determining how risk is to be managed in the Ben Lomond Reserve during the wildfire season 2024/25. QLDC considers it appropriate that the business operators also take the lead in ensuring the safety of their staff and visitors, as they are best placed to do so.

As FENZ is aware, QLDC's priority is to ensure that the wildfire risk to people visiting and working at the Ben Lomond Reserve is being effectively managed. The arrangements that have been made for 2024/2025 are the result of the consultation, cooperation and coordination of QLDC (as the reserve administrator and landlord) and the business operator PCBU's at the Reserve, together with the leadership of FENZ on the matter.

If for any reason the arrangements are changed or FENZ becomes aware that they are not being effectively implemented, then QLDC requests that FENZ notify QLDC so that the parties can review the situation and work with FENZ to ensure effective alternative risk mitigation is in place.

QLDC will continue to exercise its reserve administrator powers (ie temporary closures) in respect to the balance (non-business) areas of the Reserve.

QLDC look forward to strengthening the relationship and working with FENZ on future projects.

Yours sincerely, Nāku noa nā



Kenneth Bailey  
Community Services General Manager

CC: Ben Lomond Commercial Businesses Stakeholders

## **Bobs Peak Operators - Voluntary Wildfire Summer Plan**

Businesses operating within the Ben Lomond Reserve atop Bob's Peak acknowledge that seasonal weather patterns increase the risk of wildfires.

The Stakeholders have developed an alternative plan outlined below, which is based on the following principles:

**Phased Closure:** Restricting access to the reserve in a step-by-step manner, considering specific activities and locations, and using NIWA fire classification criteria. In simpler terms, the extent of closure corresponds to the level of risk.

**Controlled Access:** Minimising uncontrolled entry to the reserve (i.e., when people enter the area without restrictions or managed oversight) thereby reducing the risk of fires being started by individuals unlikely to follow safety guidelines, signs, or warnings.

**Timely Evacuation:** Enabling timely evacuation in accordance with QLDC fire behaviour assumptions.

*Note: The QLDC's trigger points operate on the premise that uncontrollable fires would afford individuals at the summit of Bobs Peak around 20 minutes of advance notice to either evacuate or prepare for the impending fire.*

The alternative plan is split into separate response phases (P1, P2, P3) designed to match the risk profile(s) and trigger points forecasted by NIWA. For an overview, please refer to Appendix B - Phase Matrix.

## **PHASE 1 (P1) – Reserve Open**

Aligns with the following Forest Fire Risk Management Code trigger points:

### **P1 Wildfire Readiness:**

Upon receiving notification from QLDC that a Phase 1 level has been met, the following key actions are taken:

1. Skyline Queenstown places signage at entries to the reserve from the Skyline Queenstown leased area on Bob's Peak and at the Access Road on Lomond Crescent to passively educate reserve users of increased wildfire risk.
2. Skyline Queenstown advises its contractors working onsite (within the leased area) that the following activities are restricted:
  - Hot Works
3. Skyline Queenstown advises its contractors working in the Reserve that the following activities are restricted:
  - Hot Works
  - Forestry (specifically – felling and extraction)
  - Earthworks (specifically - blasting, drilling and rock breaking)
4. Skyline Queenstown restricts the following vehicle types from utilising the Access Road:
  - Tracked Mobile Plant

### **P1 Wildfire Response:**

In the event a wildfire is reported, the response is conducted in accordance with the Ben Lomond Joint Incident Management Plan (JIMP).

*Note: The JIMP instructs contractors working within the reserve to follow their PCBU-specific wildfire response plans and re-communicate with Ben Lomond Stakeholders once safely assembled beyond the reserve.*

## **PHASE 2 (P2) – Reserve Closed**

Aligns with the following Forest Fire Risk Management Code trigger points:

### **P2 Wildfire Readiness:**

Upon receiving notification from QLDC (24hr notice) of a Phase 2 level, the following key actions are taken from 7am – 8pm (when daytime temps are highest):

1. Skyline Queenstown adjusts the daily pre-start to include:
  - Communications test conducted at the top terminal.
  - All staff onsite briefed about the heightened wildfire risk.
  - Skyline Queenstown’s senior managers are re-assigned to key roles onsite.
  - Skyline Queenstown’s maintenance staff are required to remain onsite at all times.
  - Skyline Management’s (i.e., Head Office) Chief Executive and Senior Mgmt. are advised of the heightened wildfire risk.
  
2. Skyline Queenstown MTB uplift and Guided Walks are closed.
  
3. Skyline Queenstown actively restricts public access into the reserve from the Skyline Queenstown leased area on Bob’s Peak:
  - At ticket purchase, guests are briefed on the elevated wildfire risk and advised the wider reserve is closed.
  - Signage is placed at the bottom terminal to reflect a) increased wildfire risk b) no access to reserve c) capacity onsite is limited.
  - Online website is updated to reflect a) increased wildfire risk b) no access to reserve c) capacity onsite is limited.
  - MTB uplift line at bottom terminal is closed.
  - MTB reserve access doorway at top terminal is closed and secured. Authorised access for Ziptrek only.
  - Pathway to Ben Lomond reserve from top terminal to be manned by Skyline Queenstown staff as information and awareness sentries.
  - Skyline Queenstown guests will be restricted to the activities on premise (i.e., Luge, dining, and sightseeing within the lease area).
  - Skyline Queenstown’s Luge will be made unavailable to guests with mobility challenges (these guests’ access will be restricted to gondola and top terminal).
  - Ziptrek Ecotours guests will be permitted to access the Ben Lomond reserve from Skyline Queenstown using Ziptreks own protocols (Appendix A).
  - GForce paragliding and AJ Hackett bungy remain unaffected as they operate within the Skyline Queenstown leased area on Bob’s Peak – and will follow Skyline Queenstown’s access and capacity protocols.

*Note: At Phase 2, GForce will not use their alternate take off zone, and instead restrict their operational activities to the Bob's Peak lease area.*

4. Skyline Queenstown and Ziptrek Ecotours will station 'information & awareness' sentries at key entrance points to the Ben Lomond Reserve, along with signage provided by QLDC:
  - Tiki Trail entry above Brecon Street.
  - Access Road entry at Lomond Crescent.
  - Ben Lomond Trail entry at One Mile creek.

Any public bypassing QLDC signage and 'information & awareness' sentries to access the reserve will be noted and advised to QLDC for emergency management purposes.

5. Skyline Queenstown has demonstrated its ability to safely evacuate 840 people by Gondola in a 20 minute period, however, has volunteered a self-imposed limit of 700 people. This has been approved.

*Note: Theoretically, the gondola speed and cabin capacity allow 1000 people to be evacuated from the Bob's Peak lease area within 20 minutes. Limiting capacity to 700 provides an additional margin of safety in the event of evacuation.*

6. A new safe space for invacuation has been designated with the ability safely to house up to 1183 people. This has been signed off by a GHD Fire Engineer and witnessed by FENZ during an invacuation exercise on 20/12/24. Skyline Queenstown will limit this space to 1000 people.

*Note: Limiting capacity to 1000 people provides an additional margin of safety in the event of an invacuation.*

7. Referencing points (5) and (6) above, Skyline Queenstown will restrict the number of people atop Bobs Peak at any given time to 1700.

Limiting capacity to 1700 ensures the invacuation (1000) and evacuation (700) of everyone onsite is achievable within 20 minutes.

The 1700-capacity limit will be tracked at Top Terminal Gondola by a proven Bellwether AI CCTV system, with access controlled by senior Skyline Queenstown Management personnel from the base of the Gondola.

In the unlikely event the Top Terminal Bellwether system fails, counting will switch to the backup Bellwether system installed at the base of the Gondola.

The final failsafe will be senior management manually counting people (via clickers) entering and exiting the bottom terminal.

FENZ will be provided with live access to the Bellwether system.

## **P2 Wildfire Response:**

In the event a wildfire is reported, the following key actions are taken:

1. "Wildfire" is broadcast over the Stakeholder wide emergency channel 3 and site emergency procedures are initiated.

*Note: At all times, Stakeholders can initiate a wildfire response and/or communicate to each other over this channel.*

2. Skyline Queenstown increases the gondola speed to 5m/s. (i.e., max speed).
3. Stakeholder fire wardens clear their designated areas, marshalling people to the gondola and invacuation safe space. The Gondola will continue to be used as long as it is safe to transport people to the bottom terminal where they are marshaled to the safe assembly point at Brecon Street turning head.

### **PHASE 3 (P3) – Reserve Closed**

Aligns with the following Forest Fire Risk Management Code trigger points:

#### **P3 Wildfire Readiness and Response:**

As per phase 2

## **Appendix A: Ziptrek Ecotours wildfire risk mitigation plan**

This plan forms part of the overall response from all operators within Ben Lomond reserve and sits under Skyline's overarching wildfire risk mitigation plan as the primary stakeholder.

The key focus of this plan is to manage people within the reserve to reduce the chance of an ignition event (i.e., in alignment with the primary purpose for closures as per QLDC Reserve Wildfire Plan) and to ensure timely (20 minutes for an established fire to spread – as stated within QLDC Reserve Wildfire closure plan) evacuation of the reserve if a fire was to ignite. The presence of Stakeholders within the reserve would also mean increased surveillance of unauthorised access and possible ignition triggers.

### **BUSINESS AS USUAL (BAU):**

Current and ongoing fire management controls:

- No smoking/Vaping at all times
- Fire extinguishers on all decks and in all vehicles
- Water bladders located at all decks
- Course Supervisors monitor fire indices daily and ensure operations stay within best practice. Specifically activities and events that may cause sparks or generate heat, also known as 'Hot works'
- Ziptrek staff monitor area of operation for any signs of fire or ignition risks (smoking) and educate public as required
- Guest education and understanding of risk from fire through risk disclosure and pre-tour briefing

### **PHASE 1 (P1) – Reserve Open**

Aligns with the following Forest Fire Risk Management Code trigger points:

#### **P1 Wildfire Readiness:**

Upon receiving notification from QLDC that a Phase 1 level has been met, the following key actions are taken:

- Ziptrek Ecotours restricts the following activities:
  - Hotworks
- Ziptrek Ecotours minimises access road use
- No inclusive access tours

#### **P1 Wildfire Response:**

In the event a wildfire is reported, the following key actions are taken:

- "Wildfire" is broadcast over the Stakeholder wide emergency channel 3 and site emergency procedures are initiated.

*Note: At all times, Stakeholders can initiate a wildfire response and/or communicate to each other over this channel.*

- Guides are notified of immediate evacuation requirement (radio code 10.10 on Ziptrek radios). Guests are evacuated from course to the gondola top terminal

## **PHASE 2 (P2)**

### **P2 Wildfire Readiness:**

Aligns with the following Forest Fire Risk Management Code trigger points:

Upon receiving notification from QLDC (24hr notice) of a Phase 2 level, the following key actions are taken from 7am – 8pm (when daytime temps are highest):

- Limit operations to the upper course only (Moa and Kereru tours, ziplines 1-4).
  - This control measure reduces the spread of people throughout the reserve and minimises evacuation timeframes.
- Reduce guest numbers per tour from maximum of 11 to maximum of 8
  - This control measure minimises evacuation timelines
  - Emergency vehicle has seats for a driver plus 10 (8 Guests, 2 Guides)
- Emergency vehicle stationed at the end of the four-line (MOA) tour
  - This control measure minimises evacuation timelines
  - Vehicle will only be used in emergency response capacity
- Guests will be met within the Skyline complex and led to the Ziptrek course and zipped as a group before being accompanied back to the Skyline complex post tour. This will be for each tour with a Ziptrek Guide sandwiching group.
  - This control measure limits uncontrolled access to the reserve and ensures all Ziptrek guests are managed at all times.
- Skyline Queenstown and Ziptrek Ecotours station 'information & awareness' sentries at key entrance points to the Ben Lomond Reserve:
  - Tiki Trail entry above Brecon Street.
  - Access Road entry at Lomond Crescent.
  - Ben Lomond Trail entry at One Mile creek.
- No inclusive access tours

### **P2 Wildfire Response:**

In the event a wildfire is reported, the following key actions are taken:

- "Wildfire" is broadcast over the Stakeholder wide emergency channel 3 and site emergency procedures are initiated.

*Note: At all times, Stakeholders can initiate a wildfire response and/or communicate to each other over this channel.*

- Guides are notified of immediate evacuation requirement (radio code 10.10 on Ziptrek radios). Guests will remain in their tour groups accompanied by 2 Guides and are evacuated from course to the gondola top terminal via the following routes dependent on location:
  - From Treehouse and 1high - Direct to upper terminal
  - From 1low and 2high - Exit platform stairs to ground then up road to upper terminal
  - From 2low, 3high and Kereru Launch, Kereru Land - Get to ground via exitline or Quickflight then follow emergency trail out to road then up road to upper terminal
  - From 3low, 4high, 4low and 4low exit trail - Zip line 4 then follow 4 low exit trail to road then follow road to upper terminal

*Note: emergency vehicle is in place on the road at 4 low exit trail. Vehicle will be used for last group only or those who need assistance, all other groups will make their way up on foot*

### **PHASE 3 (P3) – Reserve Closed**

Aligns with the following Forest Fire Risk Management Code trigger points:

#### **P3 Wildfire Readiness and Response:**

As per phase 2

## Appendix B: Phases Matrix

Fire Danger	Location	Phase	Activity Controls		Access Controls	Capacity Controls
Low	Reserve	BAU	Unrestricted	All activities permitted	None	Unlimited
	Access Rd.					
	Lease Area					
Moderate	Reserve	PHASE 1	Restricted	No Forestry, No Hot-Works, No Tracked Mobile Plant,	None	Unlimited
	Access Rd.		Restricted	No Tracked Mobile Plant	Educate & manage at Lomond Cr. entry point.	Unlimited
	Lease Area		Restricted	Restricted Hot-Works – NL Controls approved by FENZ	Educate (signs only) at reserve entry points from SQ lease area	Unlimited
High	Reserve	PHASE 2	Closed	No use / Ziptrek permitted but lower (ziplines 5&6) course closed.	Educate & manage at key reserve entry points (Tiki Trail, One Mile)	0
	Access Rd.		Closed	No use / Emergency transports only.	Educate & manage at Access Rd. entry point (Lomond Cr.)	0
	Lease Area		Restricted	No MTB uplift / Restricted Hot-Works – NL controls approved by FENZ / No Guided Walks / No Paragliding upper take off zone / Escort only to Ziptrek.	Educate & manage at key entry points from SQ lease area	1700
Very High	Reserve	PHASE 3	Closed	No unauthorised access	Educate & manage at key reserve entry points (Tiki Trail, One Mile)	0
	Access Rd.		Closed	No unauthorised access	Educate & manage at Access Rd. entry point (Lomond Cr.)	0
	Lease Area		Restricted	As per RED	Educate & manage at key entry points from SQ lease area	1700



Resource Management Consultants

**SUBMISSION ON DRAFT TE-TAUMATA-O-HAKITEKURA BEN LOMOND AND TE TAPANUI  
QUEENSTOWN HILL RESERVE MANAGEMENT PLAN**

**To:** Queenstown Lakes District Council – Parks Department

**Submitter Details:**

**Name of submitter:** Queenstown Commercial  
Parapenters Limited trading as  
GForce Paragliding

**Address for Service:** Queenstown Commercial  
Parapenters Limited  
C/- Southern Planning Group  
PO BOX 1081  
QUEENSTOWN 9348

Attention: Sean Dent  
[sean@southernplanning.co.nz](mailto:sean@southernplanning.co.nz)  
021 946 955

17 March 2025

## Introduction

1. This submission is made on behalf of Queenstown Commercial Parapenters Limited trading as GForce Paragliding (**the submitter**) regarding the Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapanui Queenstown Hill Reserve Management Plan (**the management plan**).
2. The submitter wishes to be heard at the hearing for the draft management plan.
3. The submitter is a lease holder over part of the Ben Lomond Recreation Reserve (**BLRR**) and operates the well-known commercial tourism business of GForce Paragliding adjacent to the Skyline gondola, lower terminal, and restaurant building.
4. Specifically, the submitter has held a lease of approximately 1.5869ha on the northeastern side of the Skyline Enterprises Limited (**SEL**) luge chair lift for the purposes of undertaking commercial paragliding. The lease authorises the submitters commercial activities and contains a small storage shed. A small portion of the lease (864m<sup>2</sup>) was surrendered by agreement in 2017 to enable SEL to construct a new pedestrian path to their lower luge chairlift terminal as part of their on-going development upgrades on Bob's Peak.
5. The submitters lease area provides for their commercial paragliding operations only. A commercial and recreational paragliding/hang gliding take off exists a short 10-minute walk away uphill in the Department of Conservation administered Ben Lomond Scenic Reserve. For clarification, this area is not under the administration and management of Queenstown Lakes District Council (**Council**) and this draft management plan.

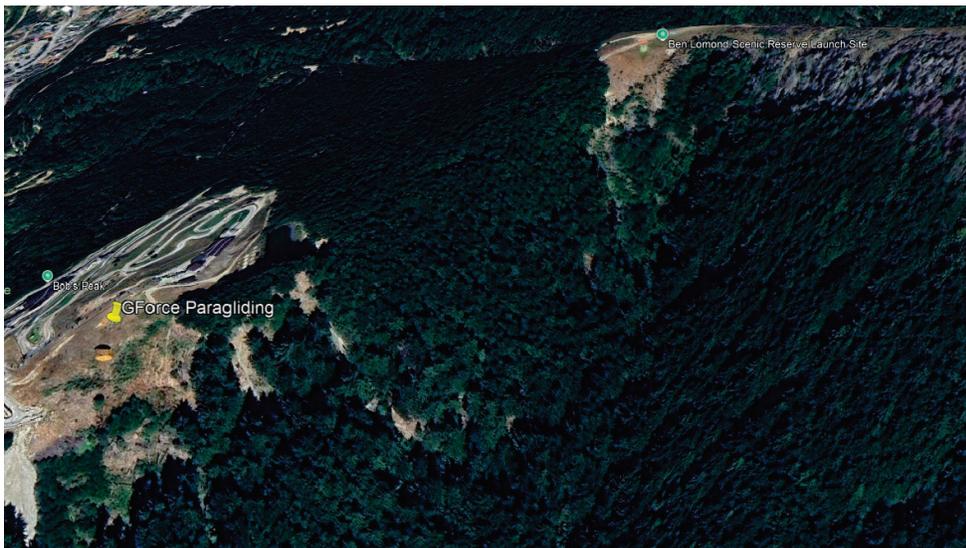


Figure 1. GForce Lease/Launch Area on BLRR and the Commercial and Recreational Launch Area in the Ben Lomond Scenic Reserve. Source – Google Earth

6. The submitter and their commercial activities in the BLRR atop Bob's Peak along with those of SEL, AJ Hacket Bungy, and Ziptrek form a recognised recreation and tourism hub which have existed and developed in this location for decades and comprise a well-recognised element within the landscape.

7. The submitters acknowledge the comments of SEL that their gondola operation sees 800,000 to 900,000 passengers annually.
8. It is therefore important that the developed area atop Bob's Peak, inclusive of the submitters lease area in the BLRR are recognised in the draft management plan and that their continued use and development is provided for. Collectively, these areas and the facilities contained within provide high recreational and sightseeing values for locals and tourists alike and they should be valued as an 'icon destination' in the reserve management plan.
9. An 'Icon Destination' is a term that has been used by the Department of Conservation (**DOC**) in the development of their management planning documents and has been described as follows:

*"Icon Destinations form the backbone to the New Zealand tourism product for overseas tourists and New Zealanders. They are the 'must see' places that provide memorable experiences.*

*DOC's proposed Icon Destinations will provide quality experiences that complement other destinations managed by other agencies or businesses. Together these icon places complete the tourism attractions of New Zealand".*

10. Icon Destinations are high-profile, popular destinations that DOC manages to support the growth of domestic and international tourism and provide memorable visitor experiences in New Zealand<sup>1</sup>.
11. Recognising and providing for the continued operation and development of the submitter's facilities (and those adjacent commercial recreation activities of SEL, AJ Hackett Bungy, and Ziptrek) as an Icon Destination is considered consistent with the principal purpose of Recreation Reserves as specified below:

*"It is hereby declared that the appropriate provisions of this Act shall have effect, in relation to reserves classified as recreation reserves, for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside."<sup>2</sup>*

12. Equivalent alternative terminology to an icon destination could also be used within the Reserve Management Plan and which is not a DOC management planning term. With the intent being to recognise and protect the established valuable tourism and recreation resource. With the above background, the submitters comments on the draft reserve management plan are discussed below.

---

<sup>1</sup> Westland Tai Poutini National Park Management Plan 2001 – Amended 2014, Section 1.3.11.1(e) - Intense Interest Sites, page 33.

<sup>2</sup> Reserves Act 1977, Section 17(1).

## Comments on the Draft Management Plan

### Commercial Recreation Use and Development

13. The draft management plan has omitted reference to some key matters regarding commercial recreation use and development within the BLRR.

14. First, with regard to paragliding operations, Section 8.2 contains the following paragraph:

*“Recreational hang gliding and paragliding occurs above the recreational reserve land on DOC administered scenic reserve from a designated take off point under the Civil Aviation Act to the northwest of the Gondola. This is a 10-minute walk from the commercial tandem launch site operated by GForce (refer above).”*

15. It is submitted that this arrangement isn't explained accurately. First, it is not just recreational hang gliding and paragliding that occurs on the DOC Scenic Reserve. The submitter also holds a Concession from DOC to undertake commercial parapenting activities from this site and has done so since approximately 1991.

16. Neither the GForce commercial take off area in the BLRR or the commercial and recreational hang gliding and paragliding take off in the DOC Scenic Reserve are “designated take off points” under the Civil Aviation Act (**CAA**).

17. Rather, both commercial and recreational paragliders and hang gliders operate within a designated General Aviation Area NZG756 (**G756**). This refers to the airspace within which the users fly within after take-off. The airspace is defined in the NZ Air Navigation Register (available on the CAA website)

18. There is an existing Memorandum of Understanding (**MOU**) between Airways Corporation of New Zealand Limited – Queenstown Tower and the Southern Hang Gliding and Paragliding Club that sets out the obligations/procedures for the use of the G756 airspace by accredited recreational pilots. For clarity, the submitter operates under their own agreement with the Airways Corporation of New Zealand – Queenstown Tower. It is noted that Policy 14.5.3 makes reference to the MOU detailed above and the accreditation process for recreational use of the G756 airspace as follows:

14.5.3. *The use of Te-Taumata-o-Hakitekura Ben Lomond Reserve for informal hang gliding and paragliding is only permitted on the designated area to the east of the Gondola (G756) on the DOC administered Scenic Reserve. To fly from the site users must be:*

- a. *an accredited pilot,*
- b. *member of the Southern Hang Gliding and Paragliding Club,*
- c. *obtain a permit to fly, and*

- d. comply with the conditions of the MOU between the Southern Hang Gliding and Paragliding Club and Queenstown Air Traffic Services.

- 19. It is considered that this Policy has a couple of issues. First, it shouldn't make any reference to what happens on the DOC administered Scenic Reserve – that land is subject to the Otago Conservation Management Strategy 2016 and is out of scope of this management plan.
- 20. Second, informal hang gliding and paragliding does not occur on nor does it commence from *within*, the BLRR. As outlined above recreational use occurs only from the Ben Lomond Scenic Reserve.
- 21. Further, in terms of the area of airspace that can be used for both informal and commercial paragliding and hang gliding, users are not restricted to the airspace to the east of the Gondola. Specifically, G756 airspace covers a substantial area to the north, east, and west of the SEL facilities as illustrated below:



Figure 2. G756 Airspace. Source - MOU

- 22. For the above reasons, it is considered that Policy 14.5.3 could be deleted as it is factually incorrect and sets out a management direction for land beyond the scope of the management plan for the BLRR.

#### Section 12 - Objectives

- 23. Objective 12.15 promotes the development of built structures to support recreation use on the BLRR. It is submitted that this should promote such structures for both commercial and informal recreation and be re-worded as follows:

12.15 To promote built structures that support both the commercial and informal recreation uses of the reserves and that positively contribute to the reserve amenity and provide public benefit.

- 24. The management plan is supportive of providing new or diversified recreation opportunities and the submitter supports this however and noting the comments above about Bob's Peak being an Icon Destination, it is submitted that there is no

Objective which sets a desirable outcome of providing for the on-going operation, use and diversification of the existing commercial recreation operations. It is submitted that the following should be added as a new Objective:

12.18 To provide for the ongoing operation, use, and diversification of the existing commercial recreation operators on Bob's Peak in recognition of their strategic importance to the Districts tourism industry.

25. Similarly, it is considered that Policy 14.5.2 should have a new point (e) added such that it reads as follows:

14.5.2 Provide for an manage the impacts of recreational use through a range of mechanisms, including, but not limited to:.....

(e) Provide for the continued operation, potential future replacement, or upgrade, and diversification of the use of the established commercial recreation facilities on Bob's Peak.

#### Wildfire Risk

26. The risk of wildfire and the potential for closure of the BLRR is considered a major impediment to management of an Icon Destination site and the submitters commercial operations in the BLRR and yet this issue appears to be very minimally addressed in the draft management plan.

27. Specifically, Section 9.3 – *Wildfire Risk* comprises three paragraphs and does not identify what the overall intention is toward management of this risk i.e. is it to maintain the status quo with potentially increasing numbers of days of closure of the BLRR in accordance with the QLDC Wildfire Reserve Closure Plan or is it to proactively reduce the risk of wildfire by expediting the removal of wilding conifers?

28. The submitter considers that this section of the BLRR requires some clear direction and would support the latter, proactive approach of reducing the wildfire risk by expediting the wilding conifer removal.

29. It is also submitted that given the substantial development that exists, and which is currently being undertaken atop Bob's Peak and the substantial number of visitors to this area and the submitter's own lease area, that Section 9.3 should identify that a priority action towards mitigating fire risk and providing a safe space for reserve users should there be a wildfire, is to establish a fire break around the commercial recreation facilities/leases on Bob's Peak.

30. It is submitted that to address these concerns the following is necessary:

(a) A new Objective in Section 12 that states:

*"To reduce the risk of wildfire by expediting the harvest and removal of wilding conifers in the Te-Taumata-o-Hakitekura Ben Lomond Recreation Reserve"*

(b) Amend Policy 14.3.11 to state:

*“Allow for reserve closures other than the Bob’s Peak Business Operators to mitigate risk for reserve users in accordance with the QLDC Wildfire Reserve Closure Plan and the Bob’s Peak Operators Voluntary Wildfire Summer Plan including any subsequent variations and revisions as approved by FENZ.*”

(c) Add a new Policy (Policy 14.3.13) that states:

*“Implement a firebreak around the existing commercial leases in the Ben-Lomond Sub-Zone on Bob’s Peak”.*

31. Implementing the above changes will give effect to agreements that have been reached between QLDC, Fire and Emergency New Zealand (**FENZ**), the submitter and other Bob’s Peak Business Operators for the 2024/2025 summer including a voluntary Wildfire Summer Plan. A copy of the Bob’s Peak Operators Voluntary Wildfire Summer Plan and the QLDC agreement of the same is attached as **Appendix [A]**.
32. These agreements essentially enable the submitters facilities (and those of Ziptrek, AJ Hackett, and GForce) to remain open during Phase 2 and 3 fire risk categories on the basis that a maximum capacity of 1,700 people at the Skyline Enterprises Limited facilities is maintained (along with other passive controls on reserve access).
33. The above number has been agreed with FENZ and QLDC following demonstrated evacuations at Skyline where limits of 700 people can be evacuated by gondola in 20 minutes and 1,000 people can be evacuated to a safe space (**the bunker**) within the Skyline Enterprises Limited building in 20 minutes – this being the critical time period for a fire at the toe of the slope to reach Bob’s Peak.
34. These agreements are more recent than the QLDC Wildfire Reserve Closure Plan<sup>3</sup> and the drafting of this draft management plan<sup>4</sup> and it is submitted are more relevant to rely on for the provisions of this management plan.

#### Indigenous Biodiversity and Forestry Activities

35. Section 7 – *Ecological History and Management* in the draft management plan discusses several key issues.
36. Section 7.1 discusses that ecological significance within BLRR can be improved through potential restoration, preservation and enhancement of natural values and in particular, the areas or remnant forest. Restoration is suggested to occur through reforestation or low flammability native species and a mix of non-invasive exotics.
37. The submitter supports the intention of enhancing the flora and fauna values of the BLRR subject to the additional comments below.

<sup>3</sup> QLDC Wildfire Reserve Closure Plan Version 2, dated 8 October 2024.

<sup>4</sup> Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapanui Reserve Management Plan, submitted to Community & Services Committee 12 November 2024.

38. In Section 7.4, the effects of the invasive nature of the Douglas Fir trees are outlined and their effects on landscape, ecological and cultural values are acknowledged. Removal of these trees is considered necessary, and the submitter strongly supports this, but it is noted that a revegetation strategy is outlined as being essential<sup>5</sup> to replace the tree canopy.
39. The submitter agrees that a replacement tree canopy is necessary for landscape, natural hazard, stormwater and recreation management. However, it is submitted that if this is an essential requirement to removing the wilding conifers and given the impacts on the key issue of wildfire risk, the revegetation strategy should be developed and consulted on as part of this wider management plan review as the issues and outcomes are interconnected.
40. Following on from the above comments in Section 7, the submitter is generally supportive of Policies for biodiversity at 14.3.5 – 14.3.7 that seek identification and protection of existing areas of native vegetation and the development of ecological restoration programmes.
41. However, it is submitted that Policy 14.3.7(b) needs to be amended such that restoration programmes do not target the areas adjacent to the Gondola and restaurant facilities nor the gondola operating Easement. As discussed above, it is submitted that a firebreak needs to be implemented around these facilities immediately and even native vegetation can be flammable and must maintain a safe distance from the submitter's facilities.
42. Further, the submitter wishes to understand the extent and location of any revegetation strategy in so far as such plantings may impact on the safety of their commercial paragliding activities.
43. Regarding forestry, Policy 14.3.2 requires development of a forestry management plan for the BLRR that requires a staged approach to Douglas Fir removal, followed by a revegetation programme.
44. The existing forestry management plan for the BLRR was developed in 2006 and it is submitted that this is now outdated and not fit for purpose. This is an important document in being able to remove the Douglas Firs and it is submitted that development of a forestry management plan be required within a set period of time i.e. 12 months. Leaving the Policy open ended as to timing means that development of this document could be years away.
45. As already noted above, it is submitted that a revegetation strategy must be developed now, as part of this review process given that the vegetation cover for the reserve affects several key issues and characteristics (landscape, biodiversity, wildfire, and other natural hazards, and recreation (mtb trails) of the reserve.

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<sup>5</sup> Draft Te-Taumata-o-Hakitekura Ben Lomond and Te Tapanui Queenstown Hill Reserve Management Plan, Section 7.4, page 7, paragraph 7.

46. Policy 14.3.3(a) also specifies that forestry management plans need to consider having minimal impact on amenity values through use of low impact extraction methods. Low impact extraction methods are not defined, but it is assumed that this may include options such as heli-logging which have less landscape effect I.E. tracking and earthworks.
47. It is submitted that this Policy may not result in an expedient or cost-effective approach to removal of the conifer trees. The site is a very difficult site to work within and while landscape/amenity values are important to preserve, it is submitted that the temporary landscape and visual amenity effects of an efficient and cost-effective forestry operation (followed by a suitable revegetation process) is preferable over a slow extraction process that doesn't resolve quickly the wildfire risk in the reserve. Policy 14.3.3(a) should be replaced as follows:

14.3.3 Recognise that forestry plans need to consider:

- (a) Expediting the removal of conifer trees in Te Taumata-o-Hakitekura Ben Lomond Reserve to reduce the risk of wildfire to reserve users.
- (b) ~~Minimal~~ Managing impact on amenity values through the use of low impact extraction methods, where practicable, while recognising the long-term goal of restoring the natural environment and enhancing biodiversity values.

#### Other Matters

48. There are some minor other matters that the submitter wishes to comment on as follows.
49. Appendix 1 – Reserve Map does not appear to accurately reflect the lease areas on the BLRR. Specifically, the submitters lease area does not appear to be illustrated (neither is AJ Hackett Bungy) or referenced – this may be due to the scale of the map, but they are key leaseholders and should be identified.
50. Section 7.5 discusses pest animals and notes that feral goat numbers are steadily increasing and have a significant impact on native biodiversity and that goat control will play an important part of any revegetation programme.
51. The submitter acknowledges this is a major issue and will be an impediment to any revegetation strategy. It is respectfully submitted that development of a revegetation strategy for conifer removal needs to be developed in accordance with a comprehensive goat control plan.
52. There is very little detail in the draft management plan as to what goat control might be other than collaborating with adjacent landowners/administrators to co-ordinate efforts. This appears to be implementing the status quo, and it is submitted that this isn't sufficient to realise the Objectives (12.4) and goals of the draft management plan for a replacement tree canopy and restoration of biodiversity values.

53. More direction on the frequency/intensity of ground control operations to achieve the plans outcomes would be beneficial.

#### Grazing Licences

54. The submitter strongly supports Policy 14.5.2.1 which seeks to enable the granting of a licence(s) for grazing to prevent re-invasion of wilding conifers where it does not impede regeneration of native biodiversity.

55. Grazing of areas that have been subject to wilding conifer removal, either on a short- or long-term basis, to prevent re-invasion of wilding species and keep these areas managed to reduce wildfire risk (i.e. from unkempt grass growth) is considered a low impact and cost effective way to manage large areas of land in the reserves that are otherwise not utilised.

56. It would also be an appropriate management control in the BLRR within the SEL easement for the gondola corridor where no vegetation is desirable, and the adjacent land containing the power lines where again, vegetation is not desirable, and wilding conifers have recently been removed. Maintaining this area free of vegetation and subsequently, fire risk is a benefit to all Bob's Peak Business Operators.

57. It is noted that such activities are enabled through Sections 71 and 72 of the Reserves Act 1977 and maintaining this Policy in the management plan is therefore entirely consistent with the Act.

#### Conclusion

58. As noted above, the submitter generally supports the draft management plan subject to implementing the clarifications and additional information outlined in the above paragraphs. The submitter seeks any other consequential, related, or necessary additional relief to that set out above, and in order to give effect to the objectives stated in this submission.

59. The submitter wishes to be heard in support of their submission.

60. If other make a similar submission, the submitted will consider presenting a joint case with them at a hearing.



Sean Dent on behalf of GForce Paragliding Limited

# Appendix [A]

12 December 2024

James Knapp  
Community Risk Manager, Otago  
Fire Emergency New Zealand  
By email: [James.Knapp@fireandemergency.nz](mailto:James.Knapp@fireandemergency.nz)

Dear / Tēnā koe James,

**Re: FENZ position in relation to Ben Lomond Reserve (Bob's Peak) fire risk for the 2024/25 season**

Queenstown Lakes District Council (QLDC) would like to thank Fire and Emergency New Zealand (FENZ) for their support over the last few months partnering on the Ben Lomond wildfire prevention program.

This letter accepts the arrangement between FENZ and the Ben Lomond Commercial Businesses Stakeholders as detailed in the 'Bobs Peak Business Operators Voluntary Wildfire Activity and Access Controls 241022' and your letter dated 29<sup>th</sup> November 2024 (attached).

QLDC would like to acknowledge FENZ's leadership role in determining how risk is to be managed in the Ben Lomond Reserve during the wildfire season 2024/25. QLDC considers it appropriate that the business operators also take the lead in ensuring the safety of their staff and visitors, as they are best placed to do so.

As FENZ is aware, QLDC's priority is to ensure that the wildfire risk to people visiting and working at the Ben Lomond Reserve is being effectively managed. The arrangements that have been made for 2024/2025 are the result of the consultation, cooperation and coordination of QLDC (as the reserve administrator and landlord) and the business operator PCBU's at the Reserve, together with the leadership of FENZ on the matter.

If for any reason the arrangements are changed or FENZ becomes aware that they are not being effectively implemented, then QLDC requests that FENZ notify QLDC so that the parties can review the situation and work with FENZ to ensure effective alternative risk mitigation is in place.

QLDC will continue to exercise its reserve administrator powers (ie temporary closures) in respect to the balance (non-business) areas of the Reserve.

QLDC look forward to strengthening the relationship and working with FENZ on future projects.

Yours sincerely, Nāku noa nā



Kenneth Bailey  
Community Services General Manager

CC: Ben Lomond Commercial Businesses Stakeholders

## **Bobs Peak Operators - Voluntary Wildfire Summer Plan**

Businesses operating within the Ben Lomond Reserve atop Bob's Peak acknowledge that seasonal weather patterns increase the risk of wildfires.

The Stakeholders have developed an alternative plan outlined below, which is based on the following principles:

**Phased Closure:** Restricting access to the reserve in a step-by-step manner, considering specific activities and locations, and using NIWA fire classification criteria. In simpler terms, the extent of closure corresponds to the level of risk.

**Controlled Access:** Minimising uncontrolled entry to the reserve (i.e., when people enter the area without restrictions or managed oversight) thereby reducing the risk of fires being started by individuals unlikely to follow safety guidelines, signs, or warnings.

**Timely Evacuation:** Enabling timely evacuation in accordance with QLDC fire behaviour assumptions.

*Note: The QLDC's trigger points operate on the premise that uncontrollable fires would afford individuals at the summit of Bobs Peak around 20 minutes of advance notice to either evacuate or prepare for the impending fire.*

The alternative plan is split into separate response phases (P1, P2, P3) designed to match the risk profile(s) and trigger points forecasted by NIWA. For an overview, please refer to Appendix B - Phase Matrix.

## **PHASE 1 (P1) – Reserve Open**

Aligns with the following Forest Fire Risk Management Code trigger points:

### **P1 Wildfire Readiness:**

Upon receiving notification from QLDC that a Phase 1 level has been met, the following key actions are taken:

1. Skyline Queenstown places signage at entries to the reserve from the Skyline Queenstown leased area on Bob's Peak and at the Access Road on Lomond Crescent to passively educate reserve users of increased wildfire risk.
2. Skyline Queenstown advises its contractors working onsite (within the leased area) that the following activities are restricted:
  - Hot Works
3. Skyline Queenstown advises its contractors working in the Reserve that the following activities are restricted:
  - Hot Works
  - Forestry (specifically – felling and extraction)
  - Earthworks (specifically - blasting, drilling and rock breaking)
4. Skyline Queenstown restricts the following vehicle types from utilising the Access Road:
  - Tracked Mobile Plant

### **P1 Wildfire Response:**

In the event a wildfire is reported, the response is conducted in accordance with the Ben Lomond Joint Incident Management Plan (JIMP).

*Note: The JIMP instructs contractors working within the reserve to follow their PCBU-specific wildfire response plans and re-communicate with Ben Lomond Stakeholders once safely assembled beyond the reserve.*

## **PHASE 2 (P2) – Reserve Closed**

Aligns with the following Forest Fire Risk Management Code trigger points:

### **P2 Wildfire Readiness:**

Upon receiving notification from QLDC (24hr notice) of a Phase 2 level, the following key actions are taken from 7am – 8pm (when daytime temps are highest):

1. Skyline Queenstown adjusts the daily pre-start to include:
  - Communications test conducted at the top terminal.
  - All staff onsite briefed about the heightened wildfire risk.
  - Skyline Queenstown’s senior managers are re-assigned to key roles onsite.
  - Skyline Queenstown’s maintenance staff are required to remain onsite at all times.
  - Skyline Management’s (i.e., Head Office) Chief Executive and Senior Mgmt. are advised of the heightened wildfire risk.
  
2. Skyline Queenstown MTB uplift and Guided Walks are closed.
  
3. Skyline Queenstown actively restricts public access into the reserve from the Skyline Queenstown leased area on Bob’s Peak:
  - At ticket purchase, guests are briefed on the elevated wildfire risk and advised the wider reserve is closed.
  - Signage is placed at the bottom terminal to reflect a) increased wildfire risk b) no access to reserve c) capacity onsite is limited.
  - Online website is updated to reflect a) increased wildfire risk b) no access to reserve c) capacity onsite is limited.
  - MTB uplift line at bottom terminal is closed.
  - MTB reserve access doorway at top terminal is closed and secured. Authorised access for Ziptrek only.
  - Pathway to Ben Lomond reserve from top terminal to be manned by Skyline Queenstown staff as information and awareness sentries.
  - Skyline Queenstown guests will be restricted to the activities on premise (i.e., Luge, dining, and sightseeing within the lease area).
  - Skyline Queenstown’s Luge will be made unavailable to guests with mobility challenges (these guests’ access will be restricted to gondola and top terminal).
  - Ziptrek Ecotours guests will be permitted to access the Ben Lomond reserve from Skyline Queenstown using Ziptreks own protocols (Appendix A).
  - GForce paragliding and AJ Hackett bungy remain unaffected as they operate within the Skyline Queenstown leased area on Bob’s Peak – and will follow Skyline Queenstown’s access and capacity protocols.

*Note: At Phase 2, GForce will not use their alternate take off zone, and instead restrict their operational activities to the Bob's Peak lease area.*

4. Skyline Queenstown and Ziptrek Ecotours will station 'information & awareness' sentries at key entrance points to the Ben Lomond Reserve, along with signage provided by QLDC:

- Tiki Trail entry above Brecon Street.
- Access Road entry at Lomond Crescent.
- Ben Lomond Trail entry at One Mile creek.

Any public bypassing QLDC signage and 'information & awareness' sentries to access the reserve will be noted and advised to QLDC for emergency management purposes.

5. Skyline Queenstown has demonstrated its ability to safely evacuate 840 people by Gondola in a 20 minute period, however, has volunteered a self-imposed limit of 700 people. This has been approved.

*Note: Theoretically, the gondola speed and cabin capacity allow 1000 people to be evacuated from the Bob's Peak lease area within 20 minutes. Limiting capacity to 700 provides an additional margin of safety in the event of evacuation.*

6. A new safe space for invacuation has been designated with the ability safely to house up to 1183 people. This has been signed off by a GHD Fire Engineer and witnessed by FENZ during an invacuation exercise on 20/12/24. Skyline Queenstown will limit this space to 1000 people.

*Note: Limiting capacity to 1000 people provides an additional margin of safety in the event of an invacuation.*

7. Referencing points (5) and (6) above, Skyline Queenstown will restrict the number of people atop Bobs Peak at any given time to 1700.

Limiting capacity to 1700 ensures the invacuation (1000) and evacuation (700) of everyone onsite is achievable within 20 minutes.

The 1700-capacity limit will be tracked at Top Terminal Gondola by a proven Bellwether AI CCTV system, with access controlled by senior Skyline Queenstown Management personnel from the base of the Gondola.

In the unlikely event the Top Terminal Bellwether system fails, counting will switch to the backup Bellwether system installed at the base of the Gondola.

The final failsafe will be senior management manually counting people (via clickers) entering and exiting the bottom terminal.

FENZ will be provided with live access to the Bellwether system.

### **P2 Wildfire Response:**

In the event a wildfire is reported, the following key actions are taken:

1. "Wildfire" is broadcast over the Stakeholder wide emergency channel 3 and site emergency procedures are initiated.

*Note: At all times, Stakeholders can initiate a wildfire response and/or communicate to each other over this channel.*

2. Skyline Queenstown increases the gondola speed to 5m/s. (i.e., max speed).
3. Stakeholder fire wardens clear their designated areas, marshalling people to the gondola and invacuation safe space. The Gondola will continue to be used as long as it is safe to transport people to the bottom terminal where they are marshaled to the safe assembly point at Brecon Street turning head.

### **PHASE 3 (P3) – Reserve Closed**

Aligns with the following Forest Fire Risk Management Code trigger points:

#### **P3 Wildfire Readiness and Response:**

As per phase 2

## **Appendix A: Ziptrek Ecotours wildfire risk mitigation plan**

This plan forms part of the overall response from all operators within Ben Lomond reserve and sits under Skyline's overarching wildfire risk mitigation plan as the primary stakeholder.

The key focus of this plan is to manage people within the reserve to reduce the chance of an ignition event (i.e., in alignment with the primary purpose for closures as per QLDC Reserve Wildfire Plan) and to ensure timely (20 minutes for an established fire to spread – as stated within QLDC Reserve Wildfire closure plan) evacuation of the reserve if a fire was to ignite. The presence of Stakeholders within the reserve would also mean increased surveillance of unauthorised access and possible ignition triggers.

### **BUSINESS AS USUAL (BAU):**

Current and ongoing fire management controls:

- No smoking/Vaping at all times
- Fire extinguishers on all decks and in all vehicles
- Water bladders located at all decks
- Course Supervisors monitor fire indices daily and ensure operations stay within best practice. Specifically activities and events that may cause sparks or generate heat, also known as 'Hot works'
- Ziptrek staff monitor area of operation for any signs of fire or ignition risks (smoking) and educate public as required
- Guest education and understanding of risk from fire through risk disclosure and pre-tour briefing

### **PHASE 1 (P1) – Reserve Open**

Aligns with the following Forest Fire Risk Management Code trigger points:

#### **P1 Wildfire Readiness:**

Upon receiving notification from QLDC that a Phase 1 level has been met, the following key actions are taken:

- Ziptrek Ecotours restricts the following activities:
  - Hotworks
- Ziptrek Ecotours minimises access road use
- No inclusive access tours

#### **P1 Wildfire Response:**

In the event a wildfire is reported, the following key actions are taken:

- "Wildfire" is broadcast over the Stakeholder wide emergency channel 3 and site emergency procedures are initiated.

*Note: At all times, Stakeholders can initiate a wildfire response and/or communicate to each other over this channel.*

- Guides are notified of immediate evacuation requirement (radio code 10.10 on Ziptrek radios).  
Guests are evacuated from course to the gondola top terminal

## **PHASE 2 (P2)**

### **P2 Wildfire Readiness:**

Aligns with the following Forest Fire Risk Management Code trigger points:

Upon receiving notification from QLDC (24hr notice) of a Phase 2 level, the following key actions are taken from 7am – 8pm (when daytime temps are highest):

- Limit operations to the upper course only (Moa and Kereru tours, ziplines 1-4).
  - This control measure reduces the spread of people throughout the reserve and minimises evacuation timeframes.
- Reduce guest numbers per tour from maximum of 11 to maximum of 8
  - This control measure minimises evacuation timelines
  - Emergency vehicle has seats for a driver plus 10 (8 Guests, 2 Guides)
- Emergency vehicle stationed at the end of the four-line (MOA) tour
  - This control measure minimises evacuation timelines
  - Vehicle will only be used in emergency response capacity
- Guests will be met within the Skyline complex and led to the Ziptrek course and zipped as a group before being accompanied back to the Skyline complex post tour. This will be for each tour with a Ziptrek Guide sandwiching group.
  - This control measure limits uncontrolled access to the reserve and ensures all Ziptrek guests are managed at all times.
- Skyline Queenstown and Ziptrek Ecotours station 'information & awareness' sentries at key entrance points to the Ben Lomond Reserve:
  - Tiki Trail entry above Brecon Street.
  - Access Road entry at Lomond Crescent.
  - Ben Lomond Trail entry at One Mile creek.
- No inclusive access tours

### **P2 Wildfire Response:**

In the event a wildfire is reported, the following key actions are taken:

- "Wildfire" is broadcast over the Stakeholder wide emergency channel 3 and site emergency procedures are initiated.

*Note: At all times, Stakeholders can initiate a wildfire response and/or communicate to each other over this channel.*

- Guides are notified of immediate evacuation requirement (radio code 10.10 on Ziptrek radios). Guests will remain in their tour groups accompanied by 2 Guides and are evacuated from course to the gondola top terminal via the following routes dependent on location:
  - From Treehouse and 1high - Direct to upper terminal
  - From 1low and 2high - Exit platform stairs to ground then up road to upper terminal
  - From 2low, 3high and Kereru Launch, Kereru Land - Get to ground via exitline or Quickflight then follow emergency trail out to road then up road to upper terminal
  - From 3low, 4high, 4low and 4low exit trail - Zip line 4 then follow 4 low exit trail to road then follow road to upper terminal

*Note: emergency vehicle is in place on the road at 4 low exit trail. Vehicle will be used for last group only or those who need assistance, all other groups will make their way up on foot*

### **PHASE 3 (P3) – Reserve Closed**

Aligns with the following Forest Fire Risk Management Code trigger points:

#### **P3 Wildfire Readiness and Response:**

As per phase 2

**Appendix B: Phases Matrix**

Fire Danger	Location	Phase	Activity Controls	Access Controls	Capacity Controls	
Low	Reserve	BAU	Unrestricted	All activities permitted	None	Unlimited
	Access Rd.					
	Lease Area					
Moderate	Reserve	PHASE 1	Restricted	No Forestry, No Hot-Works, No Tracked Mobile Plant,	None	Unlimited
	Access Rd.		Restricted	No Tracked Mobile Plant	Educate & manage at Lomond Cr. entry point.	Unlimited
	Lease Area		Restricted	Restricted Hot-Works – NL Controls approved by FENZ	Educate (signs only) at reserve entry points from SQ lease area	Unlimited
High	Reserve	PHASE 2	Closed	No use / Ziptrek permitted but lower (ziplines 5&6) course closed.	Educate & manage at key reserve entry points (Tiki Trail, One Mile)	0
	Access Rd.		Closed	No use / Emergency transports only.	Educate & manage at Access Rd. entry point (Lomond Cr.)	0
	Lease Area		Restricted	No MTB uplift / Restricted Hot-Works – NL controls approved by FENZ / No Guided Walks / No Paragliding upper take off zone / Escort only to Ziptrek.	Educate & manage at key entry points from SQ lease area	1700
Very High	Reserve	PHASE 3	Closed	No unauthorised access	Educate & manage at key reserve entry points (Tiki Trail, One Mile)	0
	Access Rd.		Closed	No unauthorised access	Educate & manage at Access Rd. entry point (Lomond Cr.)	0
	Lease Area		Restricted	As per RED	Educate & manage at key entry points from SQ lease area	1700

## 97. Southern Infrastructure Limited

Queenstown Lakes District Council

17 May 2025

### SOUTHERN INFRASTRUCTURE LIMITED SUBMISSIONS ON -

### Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui Queenstown Hill Reserve Management Plan

Please find set out below submissions on behalf of *Southern Infrastructure Limited (SIL)*

- SIL is the entity leading the development of the Queenstown Public Gondola Transport System.
- SIL wishes to speak at a hearing in relation to its submissions.

### PURPOSE OF SUBMISSION

SIL is leading the development of the Queenstown public gondola transport system that will provide crucial public transportation links within the Queenstown environs. As part of providing an integrated system to compliment and develop public transportation in Queenstown the Gondola will link Frankton to downtown Queenstown.

As has been signalled in various strategic documents since 2018<sup>1</sup> this alignment will go through the Te Tapuni Queenstown Hill Reserve area and therefore this submission seeks to ensure that the subject Management Plan provides provision for the gondola, to ensure connectivity into the Queenstown Town Centre by this mode is future proofed.

Figure 1 below illustrates one of the early documents and provision for a 'Potential Gondola link to Airport'.



**Figure 1:** Queenstown Town Centre Master Plan – Potential Gondola Link to Airport

Most recently the Regional Deal Proposal for Otago Central Lakes includes as one of its five packages to support economic growth the Transformation of the transport system. The reporting notes<sup>2</sup>

<sup>1</sup> Queenstown Town Centre Master Plan – Part 3 Design Strategies

<sup>2</sup> Framing a Sub-Regional Deal for Otago Central Lakes Final Draft pg27

*The proposed Regional Deal would deliver a redesigned transport network based on innovative integration between offline Mass Rapid Transport and road based transport in Queenstown. MRT is required to maximise the limited operating capacity of the transport network. Offline MRT, such as ropeways (eg Gondola, Whoosh), helps alleviate road congestion by offering transport that bypasses traditional road networks. The Queenstown Transport Business Case clearly sets out the case for MRT in Queenstown as a long-term solution. The proposed Regional Deal would bring forward offline MRT.*

The gondola as noted in the Regional Deal will help alleviate road congestion with the associated benefits to the wider community and transport network. The proposed alignment through the reserve will also have benefits in enabling people to experience the reserve environment from a different perspective, providing a tourism opportunity with a low environmental impact.

The final alignment is still to be confirmed, but the alignment as has been illustrated from early documents would link from the Queenstown Town Centre to Frankton and Queenstown Airport via Queenstown Hill and given the extent of the Te Tapunui Queenstown Hill Reserve, will pass through this reserve.

## **DECISION SOUGHT**

To ensure the future gondola connection to the Queenstown Town Centre recognition and provision for a future gondola through the Te Tapunui Queenstown Hill Reserve is sought. The following additions to the draft plan are therefore recommended:

1. A section is added (in a similar manner to Section 11 Planned Commercial Recreation Developments) that acknowledges a gondola connection from the Queenstown Town Centre will go through the reserve
2. Add an additional objective to Section 12 as follows:
  - a. To provide for a gondola transport system through Te Tapunui Queenstown Hill Reserve
3. Add an additional policy to Section 14.5 Recreation and Use as follows:
  - a. 14.5.15 Recognise the alignment of a future gondola transport system from Queenstown Town Centre will pass through the Te Tapunui Queenstown Hill Reserve.
4. Amend policy 14.5.9 as follows to add the text shown as underlined:
  - a. With the exception of a gondola transport system as noted in Policy 14.5.15 limit commercial activities on Te Tapunui Queenstown Hill, only considering activities that would require limited facilities, have minimal impact on the natural quietness of the reserve and be in accordance with policy 14.5.10 below.
5. Any other consequential or similar amendments necessary to give effect to the intent of this submission.

Should you have any queries regarding this submission please do not hesitate to contact me.

Regards



Tim Williams  
[tim@williamsandco.nz](mailto:tim@williamsandco.nz)  
021 209 8149



**Whakatipu Wilding Conifer Control Group Inc (WCG)**

**March 2025**

**Submission to Te-Taumata-o-Hakitekura Ben Lomond & Te Tapunui  
Queenstown Hill Reserve Management Plan**

WCG wish to acknowledge with appreciation the initial consultation already held by QLDC with the WCG Group in relation to this Draft Reserve Management Plan.

## 1 Background

- 1.1 WCG was formed in 2009 by QLDC as a community-led group
- 1.2 WCG has 469,512 hectares under surveillance in six management units, of which 241,699 hectares of wilding infestations require persistent management in the form of either initial control to remove seed sources or maintenance to contain and reduce the spread.
- 1.3 Both Ben Lomond & Queenstown Hill Reserves fall under the WCG Whakatipu Management Unit (MU).
- 1.4 To date, over \$27 million has been invested in Whakatipu Wilding Control
- 1.5 Queenstown is surrounded by Otago's most severe Wilding Conifer infestation, stretching from Wilson Bay to Queenstown Hill and Arthurs Point. This widespread infestation poses a significant threat to the Whakatipu environment, with particularly harmful effects on its immediate fringes of Queenstown Hill and the Ben Lomond reserves. Over the years, substantial effort and dedication have gone into establishing containment lines around the main forests to protect the surrounding agricultural and natural environmental values.

## 2 The negative impacts of these wilding conifer species include:



- 2.1 degradation of high value Outstanding Natural Landscapes
- 2.2 the damaging effects of a fast-spreading monoculture on conservation and biodiversity values - (loss of native flora & fauna in ecosystems including species extinction - some unique to Central Otago)
- 2.3 the smothering of historic, cultural, and recreational sites and trails which includes effects on access, views and sunlight.
- 2.4 the effect on tourism values ie. the loss of vast natural vistas, the contrasts between natural light, blue lake and golden tussockland, topographic variation and the detail of rugged gullies – all of which make Queenstown awe-inspiring and unique.
- 2.5 the significant reduction of water yields affecting creeks, wetlands and rivers and in turn outdoor recreation, biodiversity, irrigation and hydro-electric generation.
- 2.6 limiting economic land uses (while increasing the cost and complexity of pasture development due to wilding spread)
- 2.7 an ever-increasing wild-fire hazard in urban and mountainous terrain

### 3 The damage from wilding conifer spread is now well-documented

- 3.1 The Parliamentary Commissioner for the Environment Report [“Space Invaders”](#)  
*“Farmers are losing grazing land to wilding conifers, homeowners are losing houses (following conifer-fuelled wildfires), conservators are losing habitat, and water yield in some catchments is being reduced”*
- 3.2 Cost Benefit Analysis Reports:  
The [National](#) benefit-to-cost ratio is 34-1 (prepared in 2022 for MPI on behalf of the National Wilding Conifer Control Programme).



The [Otago](#) benefit-to-cost ratio shows a massive 96-1, leaving no room for doubt about the seriousness of the wilding issue. (Prepared in 2023 for the Otago Regional Council).

- 3.3 Queenstown Lakes District Council (QLDC) is unique in that it has had [rules](#) in place since 2006, prohibiting the planting of wilding species, (unless the NES-CF prevails), due to the negative effects on the environment.

## 4 Methods

- 4.1 Aerial spray is an integral part of the wilding control programme. The herbicide is applied according to the National Wilding Conifer Control Program best practice guides. The Chemical Application and Climatic Conditions and Communications are best practices recommended in the Guidelines and rules that must be met under both the Otago Regional Plan – Air and Otago Regional Plan - Water.
  - Aerial Boom spray is used as a last resort in dense and inaccessible wilding stands.
  - Aerial Basal Bark Application (aerial lancing) targets smaller wildings and the “chemical ringbark” action is applied to the stem only and not the whole foliage hence the overall herbicide use is more accurate and considerably lower volumes than what most public perceive about Aerial spraying.
- 4.2 Wilding control work is managed differently around waterways with waterway spray free buffers in place. Waterway monitoring and stream sampling are also undertaken at selected flow sites.
- 4.3 WCG acknowledge that leaving aerially boom sprayed trees around existing legal tracks is not viable and other methods of control (ie. ground-work), in these situations is needed.



- 4.4 Removal of slash is not always achievable; criteria is specified so that any cut debris is left on site safely and securely. Tracks are specified to be left clear and felled trees trimmed back.
- 4.5 WCG Environmental Protection Principles always look to minimise our impact on the community.

## 5 Draft Reserve Plan Comments

- 5.1 Correct names: National Wilding Conifer Control Programme and New Zealand Wilding Conifer Management Strategy 2015 -2030 (Other related documents, 7.4)
- 5.2 Add into other related documents: Whakatipu Wilding Conifer Control Group Strategic Plan 2023-2033
- 5.3 Reword: Whakatipu Wilding Conifer Control Group (WCG) was established solely to ~~fight~~ **control** wilding conifer spread in the area. (7.4)
- 5.4 Reword: Douglas fir, an ~~aggressive~~ **aggressively spreading** wilding conifer species in the Whakatipu, is the prominent... (5.1)
- 5.5 Add to this paragraph: “Remnant mountain beech forest occupies some of the upper slopes and the side of One Mile, Two Mile and Horne Creek. In the damp gullies and nearer the streambeds, the forest is more diverse with several native species present. The Tiki Trail weaves through patches of beech forest halfway up “Bob’s Peak”. **All are at risk of being further invaded & displaced by Douglas fir.** (5.1)
- 5.6 WCG would like to see immediate planting of non-wilding species undertaken for the required screening of commercial operations where possible, so that over time wilding conifers can be removed as appropriate.
- 5.7 Add to this 12.16 Objectives paragraph: “To formalise a sustainable and well managed trail network within the reserves that meets the needs of a



range of trail users, provides a cohesive track network, and considers ongoing safety requirements.” Add: **And acknowledges the need for eventual wilding conifer control.**

- 5.8 Leaseholders to acknowledge pest management objectives, particularly Objective 12.10 “To protect landscape and ecological values by implementing staged considered approaches to wilding conifer and noxious vegetation removal.”
- 5.9 In relation to 13.1.4 – “...Consideration will have to be given to the bike trail network when the vegetation removal occurs.” Consideration should also be given to wilding conifer species removal where appropriate as the bike trail network expands.
- 5.10** WCG support 14.3.1 “Implement as a priority Te Tapunui Queenstown Hill Forestry Plan to remove pest species, particularly Douglas fir.” Add “**and other wilding conifer species**”
- 5.11 WCG support 14.3.2 “Develop and implement a forestry plan for Te-Taumata-o-Hakitekura Ben Lomond Reserve that provides a staged approach to the removal of Douglas fir and other invasive exotic species followed by a revegetation programme.”
- 5.12 Include: Any new tracks built under dead trees will take into consideration the need for the track builder to remove dead trees which pose a safety hazard to track users.

**the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan**

Thank you for the opportunity to submit on the future of the Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserves. I acknowledge the work that has gone into the draft document today and the community engagement that has occurred to date.

I am generally supportive of the objectives and policies of the DRAFT Te-Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve (Draft Plan) as they relate to promoting and enhancing recreational facilities and access to the Reserves.

However, I am **strongly opposed** to the following specific parts of the Draft Plan. Further work is required to better align with the wishes of the community and improve outcomes for residents and visitors.

Below I provide specific commentary on selected parts the Draft Plan, referencing the relevant sections of the document. Text in italics is taken from the Draft Plan

**Section 8.2 – Description of Primary Users and Activities - Te Tapanui Queenstown Hill Reserve**

Unauthorised.mountain.biking.tracks.have.also.been.developed.with.the• ;

Use of the word ‘unauthorised’ has specific legal meaning and context under the Reserves Act 1977 (the Act) that is different to what is inferred in the draft wording. The use of ‘unauthorised’ should be reconsidered.

The Draft Plan wording in Section 8 downplays (intentionally?) the existence and significance of the mountain bike trail (MTB) network inside the Queenstown Hill Reserve. The trails, as shown indicatively in the Strava ‘heat-map’ are well established with some having been in-place for 20+ years.

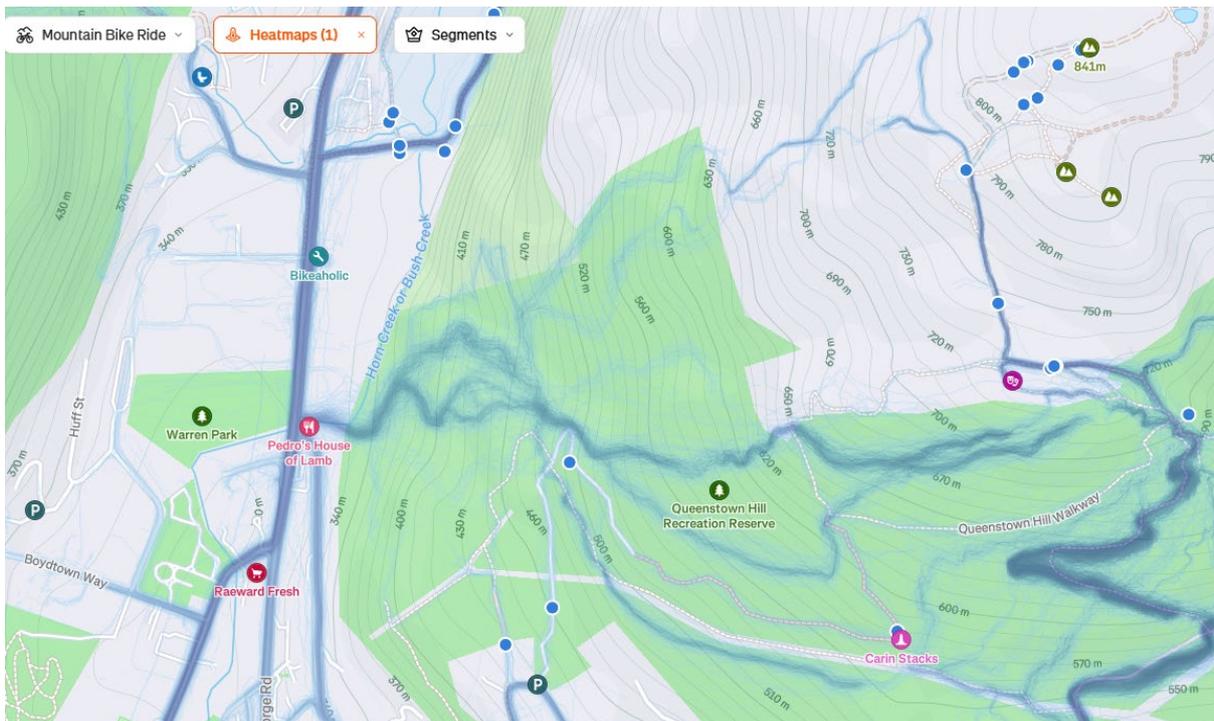


Figure.7. Mountain.Bike.Trails.are.shown.by.the.blue.lines;.Darker.lines.indicate.higher.frequency.of.recorded.use;

The trails are popular as Queenstown Hill Reserve forms one of three (the other two being Ben Lomond Reserve and 7-Mile, which is undergoing deforestation) all year, all weather mountain biking areas accessible from Queenstown. The types of trails, natural features present and proximity to the CBD have made this mountain biking area internationally significant.

The Draft Plan wording needs to be amended to reflect the actual situation inside the Queenstown Hill Reserve and recognise that many Queenstown residents and international visitors use the trail network for their recreational enjoyment.

While acknowledging that these are 'unsanctioned' or 'unofficial' the Draft Plan should aim to work collaboratively with the MTB community to formalise them, where it is appropriate to do so. New objectives and policies that relate specifically to MTB trails on Queenstown Hill need to be incorporated in Section 13.2 of the Draft Plan. It is not appropriate to turn a blind-eye to the existing trail network solely because sufficient resources haven't been applied to addressing what is largely an issue of compliance.

These proposed changes would better align the Draft Plan with the current (2005) Reserve Management Plan - 11.1.1 (7) that provided for mountain bike trails on Queenstown Hill

- To exclude mountain bike use within 866 metres of (and including) the Time Walk track and restrict mountain bike use to formed and approved trails;

and align the Draft Plan with the Reserves classified use under The Act as a Recreation Reserve

- for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public and for the protection of the natural environment and beauty of the countryside with emphasis on the retention of open spaces and on outdoor recreational activities including recreational tracks in the countryside;

#### **Section 13.1.4 – Ben Lomond Bike Trails**

Consideration will have to be given to the bike trail network when the vegetation removal occurs;

The above wording suggests that removal of the exotic species in Ben Lomond is a certainty and only a matter of time before it happens. While I acknowledge that the Draft Plan has been guided by early engagement with the community, I don't believe the current wording accurately reflects the views of the wider community. Many in the community would be very surprised to hear the trees are to be removed. The significant community back-lash to the damage caused to the Queenstown Cemetery following forestry operations in Ben Lomond Reserve supports this view.

Further to this, the wording suggests that removal can be harmonious with maintaining a network of biking trails. This is simply **not the case** – the presence of biking trails in these reserves is inextricably linked to the established trees that protect them. The terrain is too steep and the soil profile too shallow to support trails without a dense, tree canopy.

### **Section 14.3.1 – Landscape Protection Forestry**

Implement.as.a.priority.Te.Tapunui.Queenstown.Hill.Forestry.Plan.to.remove.pest.species?  
particularly.Douglas.Fir

This section hasn't been written with the qualifying statements (paraphrased) .... That.provide.a.  
staged.approach• .followed.by.a.revegetation.programme;..that are found in Section 14.3.2

What are the reasons for the urgency behind a forestry plan for Queenstown Hill, why does it not require the more holistic and balanced approach that the Draft Plan suggests Ben Lomond is to receive with its staged approach and revegetation? Many of the issues present on Ben Lomond Hill that warrant staging and revegetation are also present on Queenstown Hill.

As written, it suggests that removal of the wilding is paramount above all other community issues and concerns. Is this the case? Unmanaged wilding removal can result in the proliferation of other invasive species, as seen at Morningstar Beach Recreation Reserve. That is now becoming overrun with Sycamore, Blackberry and other noxious weeds as there was (is) no plan to facilitate revegetation.

### **Section 14.6.9 - Biking & Walking Tracks**

Remove.and.rehabilitate.unauthorised.tracks.and.trails

The Draft Plan needs to reflect that many of Queenstown established mountain bike trails started life as unauthorised trails. Many of the best and most frequently used trails in the district are currently 'unauthorised'. There needs to be an amnesty to, where appropriate, allow established tracks to become part of the official track network and preserve a world-class mountain biking destination.

The MTB community is likely to be far more receptive to the conversion of some 'pirate' trails to official trails and the resulting loss of others than blanket removal of 'unauthorised' trails.

Similarly, community buy-in of 'due process' to seek approval prior to building trails will be much greater if the relationship between QLDC and the MTB community isn't sabotaged by an overly heavy-handed approach.

### **General Comments**

More generally the language of the Draft Plan leans heavily towards removal of wilding conifers at the expense of reserve users and other tangible benefits to the community. While there are undisputable negative aspects associated with exotic wilding species, they do provide significant recreational, social and economic benefits. These, which are outlined below, are not referred to in the Draft Plan. Perhaps intentionally to suit the narrative, but they need to form part of the holistic discussion about the future of these trees. The financial and non-financial costs associated with their removal needs to be understood and weighed against other strategies such as funding ongoing wilding control management both inside and outside of the reserve.

- As referenced in the Draft Plan the Reserves are mostly, steep, geologically unstable hill-sides and the trees are doing a very economical and aesthetically pleasing job of tying the hillsides together, while protecting the communities below them from rockfall, debris and landslides. The cost associated with engineered rock-fall fences (14.3.18) to provide a similar level of protection to which the trees currently provide is likely to stretch into the tens of millions of dollars, as well as blight the landscape with man-made masses of steel cable and mesh fencing. Is this a cost the community needs to incur? Most would argue we cannot afford it. Either way it is not accounted for in the Draft Plan.
- Two generations of Queenstowners have only ever known Queenstown Hill and Ben Lomond Reserves to be covered by in trees. They are a fundamental part of the iconic backdrop to the town.
- Large parts of both Reserves are assumed to fall under the requirements of the Emissions Trading Scheme. Deforestation of pre-1990 forest is likely to incur costs that are not stated. Have these been calculated and accounted for?
- The economic benefits of mountain biking to the community are acknowledged in the Draft Management Plan – but there is no commentary or reflection upon the economic cost associated with removal of the wildings in the Reserves and or removal of MTB trails on Queenstown Hill.
- Recreation – the Draft Plan does a good job of acknowledging the recreational uses and benefits of the reserve. What it does not articulate, is that many of these benefits exist because of or at the least are enhanced by the established trees covering the Reserves
  - Protection from freeze-thaw cycles. The tree canopy protects the trail networks from the free-thaw cycle that would render most of the trails (walking and biking) unusable in winter months
  - Significantly reduces trail maintenance and damage from the environment. A relevant example being the Time Walk on Queenstown Hill – which has a smooth surface inside the tree canopy and a rutted out, water damaged surface for the upper portion outside of the forested area
  - Shading – the benefit that trees provide to shade tracks simply cannot be underestimated. Walking or biking trails on hot summer days is far more enjoyable in the shade of the forest
  - Transpiration and cooling effect of the forests
  - Much of the terrain within the Reserves is steep and rocky. It simply cannot support widespread trail networks without the trees managing soil moisture, preventing run-off, and binding the hillside together.
- The carbon sequestration of these forests is significant and measured in the tens of thousands of tonnes per year. As mature trees, their rate of sequestration is high (>25t/ha/yr) and even if the Reserves are re-planted, removal will result in large carbon emissions that will take decades to offset.
- The Otago Regional Council Pest Management Plan has wilding conifers in the Progressive Containment Programme. Complete eradication of wilding conifers is therefore not a requirement of regional (or national) management plans and provides the option to maintain selected areas of reserve in forest cover.

## Conclusion

Ultimately, as a long-term resident and frequent user of both Reserves, I would like the Draft Plan to have a more balanced approach. That acknowledges that our world class mountain bike network has grown, largely organically, inside these established forests as the forests are solely responsible for providing the environment that enables them to exist. Perhaps the best way to articulate this is by highlighting what MTB trails look like outside of forested areas.

- The only trail network of significance in our area that is not within an established forest, are those on the face of Coronet Peak. Which cannot be ridden for 6-8 months of the year due to the free-thaw cycle, require tens of thousands of dollars in maintenance each Spring to bring the trails up to a rideable standard, and can't be ridden in the wet. Without established forests, Queenstown would lose its year-round, all-weather attractiveness as a place to ride mountain bikes. The economic cost of this is likely measured in the tens of millions of dollars ([Bike visitor spend](#) is estimated by Benji Patterson to be \$210m or 50% of the ski visitor economy by 2026).

In simple terms - if the financial cost of containment of wilding spread from the 'seed-source' within Ben Lomond and Queenstown Hill Reserves is less than the tangible and intangible benefits maintain the trees, or selected parts of, provide. What is the harm in keeping a few tens of hectares of established conifer forest amongst tens of thousands of hectares of sub-alpine tussock-land and regenerating bush within the Wakatipu?

Yours sincerely,

Vincent Willcock

## Attachment C: Schedule of Submitters

### Attachment C - Schedule of submitters on draft Te Taumata-o-Hakitekura Ben Lomond and Te Tapunui Queenstown Hill Reserve Management Plan

Green indicates submitters who wish to be heard

No.	Name	Organisation	Speak at hearing	Overall position on RMP
1	Adam Copland	Commonage Developments Limited	Yes	Support
2	Alex Bulling		No	Support
3	Amy Wong		No	Support
4	Amy Wong	Fernhill Sunshine Bay Community Association	No	Support
5	Andrew Blackford		No	
6	Anna Harding-Shaw	Whakatipu Wildlife Trust	No	Support
7	Ash Peters	WORD (World Off-road Riding Department)	No	Support
8	Bella		No	Neutral
9	Ben Bulling		No	Support
10	Ben Robie		No	Support
11	Bruce McLeod	Queenstown Mountainbike Club	No	Support
12	Cassie Pineau		n/a	Support
13	Chris Grose		No	Neutral
14	Connor Smith		N/a	Support
15	Conor Macfarlane		No	Support
16	Craig Cox		No	Neutral
17	Daisy Maddinson	Forward Whakatipu/ Patagonia	No	Support
18	Damon	Endeavour Electric	N/a	Support
19	Damon Commerer		N/a	Support
20	Daniel Excell		No	Neutral
21	Daniel Milne		N/a	Support
22	Daniel Shorrocks		No	Neutral
23	David Harding-Shaw		No	Support
24	Dayner Patten		No	Support
25	Duncan Kenderdine		No	Support
26	Erin Greene		No	Support
27	Ferg		No	Support
28	Guy Hingston	Bowen Peak Limited	Yes	Support
29	Hanna Lynch		No	Neutral
30	Hannah Fox		No	Support
31	Hannah White		No	Neutral
32	Harry Excell		No	Neutral
33	Harry Steer			Support
34	Hayden Lockhart		N/a	Support
35	Holly Townsend		No	Oppose
36	Jake Byrne		N/a	Support
37	Jake Luckin		n/a	
38	James Imlach	New Zealand Motor Caravan Association Inc.	No	Oppose
39	James Mulcahy		No	Support
40	James Rhodes		No	Neutral
41	James Sutherland	Heritage New Zealand	No	
42	Jamie Seymour	Smokefree Otago	No	Support
43	Jarrahealy		n/a	Support

44	Jason McDonald		No	Support
45	Jen Andrews		No	Support
46	Jenni Dimmock		No	Support
47	Jo Knight	Sport Central/Sport Otago/Sport New Zealand	No	Support
48	Joe Robinson		n/a	Support
49	John		No	Oppose
50	John Seely		n/a	Support
51	Jon Mann		No	Support
52	Jordan Fritz		No	Support
53	Julie Margeret Scott		No	Support
54	Julien		No	Support
55	Kate		No	Neutral
56	Katy Winton		No	Neutral
57	Kelvin Middleton	Queenstown Hill Station	Yes	Neutral
58	Lisa Murphy	Goldfield Heights Body Corporate	No	Support
59	Lisa Murphy	Goldfield Heights Body Corporate	No	Support
60	Maddy Grandiek (on behalf of Trent Yeo)	ZJV (NZ) Limited, trading as Ziptrek Ecotours.	Yes	Support
61	Marcus van Egmond		No	Neutral
62	Mark Williams	Queenstown Trails Trust	No	Support
63	Matthew Edwards		No	Support
64	Matthew Packwood		N/a	Support
65	Matthew Turner		N,a	Support
66	Meesha Powell		No	Oppose
67	Meghan Lee		No	Neutral
68	Mel Bowles		No	Support
69	Michael Quante		No	Support
70	Michael Robson		No	Oppose
71	Miles h=Holden		No	Neutral
72	Molley		No	Support
73	Moretta Excell		No	Neutral
74	Nick Coleman		No	Neutral
75	Nicole Haenz		No	Support
76	Nicole Mesman		No	Neutral
77	Nigel Lloyd		No	Neutral
78	Nikki Atkinson (on behalf of Bruce McLeod)	Queenstown Mountain Bike Club	Yes	
79	Ollie Clements		n/a	Support
80	Paul Tustin		No	Support
81	Paula Hugens	eZED Limited	Yes	Support
82	Peter & Jan Williams		No	Neutral
83	Peter De La Mare		No	Support
84	Reuben Costello		No	Support
85	Robert Lyons		No	Support
86	Roderick Allan		No	Support
87	Rory Bingham		No	Support
88	Ryan Purcell		No	Support
89	Sam Bates		N/a	Support

90	Samantha Collyer		No	Oppose
91	Samson sands-davies	Queenstown catering	No	Support
92	Sara Bradley		N/a	Support
93	Sean Dean	Skyline Enterprises Limited	Yes	Support
94	Sean Dean	Queenstown Commercial Parapenters Limited trading as GForce Paragliding	Yes	
95	Sean McCarroll		No	Support
96	Sean McLeod		No	Support
97	Southern Infrastructure Limited represented by Tim Williams	Southern Infrastructure Limited	Yes	Support
98	Steve Carry		No	Support
99	Steven Peters		No	Support
100	Suzanne (Sue) Rose (on behalf of Grant Hensman)	Whakatipu Wilding Control Group (WCG)	Yes	
101	Thomas Allen		N/a	Support
102	Tiago Leme		No	Support
103	Tom Gray		No	Neutral
104	Tom Hey		Yes	Support
105	Tom O'Neill	Fernhill Resident	No	Support
106	Vincent Willcock		Yes	Neutral