

File ref: FTAA-2607-1264

14 September 2026

Ben Bond
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By email: info@fasttrack.govt.nz; [REDACTED]

Dear Ben

Request for further information in relation to your application under the Fast-track Approvals Act 2024

Simplicity Living Limited (SLL) received a Request for Further Information from the Environmental Protection Agency (EPA) on 3 September 2026 to assist the EPA in determining whether the application is complete under section 46(2) of the Fast-track Approvals Act 2024 (FTAA).

This response addresses the matters raised in the EPA's letter dated 3 September 2026, specifically the request for further detail under Clause 2(1)(k) and Clause 2(1)(g) of Schedule 7 of the Fast-track Approvals Act 2024.

1. Wildlife Approval

To meet the requirements for a substantive application under section 43(3)(h), specifically clauses 2(1)(g) and 2(1)(k) of Schedule 7 of the Act, please provide further information for:

- (a) *Clause 2(1)(k): where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife).*

Further detail is required to adequately meet the information requirements of this clause. The information must be provided in sufficient detail for an expert panel to assess the wildlife approval application. A lizard management plan will not be required in every case, however the application documents must contain sufficient information to state what methods the applicant will be using to avoid and minimise the adverse effects, as set out in clause 2(1)(k) above. Explaining how those methods will be developed in future may not be sufficient; it may be necessary to state what the methods that will be used are.

Additionally, as it relates to Clause 2(1)(g) - describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes – please describe the methods to be used for the Incidental Discovery Protocol.

Specifically, how contractors will safely, efficiently, and humanely catch and house any lizards found while herpetologists are not on site.

The Applicant's ecologists, Wildlands, have reviewed the request for further information and provided the technical response appended as **Attachment A**. The response addresses clauses 2(1)(g) and 2(1)(k) of Schedule 7 by outlining the actual measures proposed to avoid or minimise adverse effects on protected wildlife, including the procedures to be followed if lizards are encountered during works under the Incidental Discovery Protocol.

As previously advised, the species most likely to be present within the project area, primarily McCann's skink, are common (classified as Not Threatened) and typically occupy modified or disturbed environments. The Lizard Habitat Assessment also identified the possibility of Southern grass skink which is classified as At Risk – Declining as being present.

The development footprint itself is not high-value lizard habitat; it comprises previously farmed land and a small area of hedging within the water supply pipeline (concession area). Wildlands consider this to be overall low-quality habitat lacking significant refugia, dense grassland, and is highly fragmented.

Given this context, the potential adverse effects are confined to temporary disturbance during vegetation clearance and earthworks, the possibility of accidental injury during construction, and the loss of low-value habitat. These effects occur at the site scale only and do not extend to population-level impacts. There is no risk of local extinction or loss of regionally significant habitat.

The methods proposed for surveying, salvaging, handling, and relocating lizards are standard DOC-aligned practices designed specifically for the species expected to be present. These include pre-construction surveys, progressive habitat reduction, lizard salvage and release, and an incidental discovery protocol to ensure safe and humane handling. From a planning perspective, these measures avoid adverse effects where practicable and minimise them where avoidance is not practicable. Wildlands' detailed methods are contained in **Attachment A**.

We consider that the information provided in this response, together with the accompanying Wildlands memorandum, is sufficient for the EPA to determine completeness under section 46(2A) and to progress the application.

If you have any questions, please contact me by phone or email.

Yours sincerely,

[Signature]

Jo Skuse
Principal Planner

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Attachment A: Wildlands Memorandum, dated 14 September 2026