

BEFORE THE PANEL CONVENER

UNDER the Fast Track Approvals Act 2024 ("**the FTAA**")
IN THE MATTER of an application by Ridgeburn Limited for approvals under
the FTAA for a referred project, Ridgeburn

**MEMORANDUM OF COUNSEL ON BEHALF OF RIDGEBURN LIMITED AS APPLICANT
RESPONDING TO MINUTE 4 OF THE PANEL CONVENER**

29 JUNE 2026

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MAY IT PLEASE THE CONVENER:

Introduction

1. This memorandum is filed on behalf of Ridgeburn Limited (“**the Applicant**”) in response to Minute 4 of the Panel Convener dated 24 June 2026 (“**the Minute**”).
2. This memorandum is filed in advance of the Convener Conference scheduled for 30 June 2026. It addresses the information sought in Schedules 1 and 2 of the Minute.
3. As identified in the AEE, Ridgeburn seeks approvals for a master-planned residential and mixed-use development between Arrowtown and the Kawarau River in the Queenstown Lakes District. Significant regional benefits will be delivered through direct capital investment, provisions of employment opportunities, a substantial increase in housing supply and affordability through the delivery of 1,210 dwellings (including affordable rentals) in a timely and coordinated manner. The proposal will also deliver regionally significant infrastructure and improved local service provision, including a neighbourhood-scale retail offering¹, while achieving substantial environmental gains through indigenous revegetation, habitat restoration and long-term ecological enhancement across a highly modified landscape.

Attendees

4. The following attendees will be present at the Convener Conference on behalf of the Applicant:
 - (a) Kurt Gibbons (Ridgeburn Ltd Representative);
 - (b) Cameron Hodgson (Ridgeburn Ltd Representative);

¹ The development incorporates a mix of uses within a commercial village hub, including retail, shared working space, a daycare, and community facilities.

- (c) Nick Roberts (Planning – Barker & Associates);
- (d) Olivia Fitzgerald (Planning – Barker & Associates);
- (e) Jeremy Brabant (Barrister).

Approvals

5. A summary of approvals sought is set out in Part 6 of the Assessment of Environment Effects² (“**AEE**”) filed in support of the application (pages 95-102). In summary, these include:
 - (a) resource consents that would otherwise be applied for under the Resource Management Act 1991 (“**RMA**”) (“**RMA Approvals**”);³
 - (b) an authority that would otherwise be applied for under the Wildlife Act 1953 (“**Wildlife Act**”);⁴
 - (c) an authority that would otherwise be applied for under the Heritage New Zealand Pouhere Taonga Act 2014 (“**HNZPT Act**”).⁵

Engagement

6. The approach and extent of the Applicant’s pre-lodgement consultation is summarised in section 7 of the [substantive application](#), with further detail provided in Volume C ([Consultation Summary Report](#)) and Appendix 44 ([Schedule of Consultation with Māori](#)).
7. Following lodgement of the substantive application in March 2026, the Applicant has continued to engage with Heritage New Zealand Pouhere

² https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/27173/0Ridgeburn-Substantive-AEE.pdf

³ Being land use resource consents from Otago Regional Council (ORC) and Queenstown Lakes District Council (QLDC), subdivision consent from QLDC, discharge permits from ORC and consents under the National Environmental Standards for Freshwater 2020 and National Environmental Standard for the Assessment and Management of Soil Contaminants to Protect Human Health.

⁴ Being a wildlife permit to capture, handle and relocate protected lizard species within the site, and to authorise any incidental mortality associated with the work.

⁵ Being authorisation under section 44 of the Heritage New Zealand Pouhere Taonga Act 2014 (‘HNZPTA’) for any works that may modify or disturb an archaeological site.

Taonga, Department of Conservation, Queenstown Lakes District Council, Otago Regional Council, Te Ao Mārama Inc. / Kāi Tahu and New Zealand Transport Agency Waka Kotahi in a manner of different ways. An overview of steps taken since lodgement is set out in **Appendix A**.

Information

8. A significant volume of information has been provided in support of the application. The Applicant has not identified any further information that might be required to accurately scope the potential effects of the activity and any potential information gaps.

Complexity

9. The Application relates to the residential and mixed-use development, along with supporting infrastructure (including onsite water and wastewater infrastructure) and extensive ecological enhancement. It is not considered to present any evidential or factual issues that are particularly complex or novel which would significantly extend the decision-making timeframe. In that regard:
10. **Legal complexity:**
 - (a) While the application seeks a number of RMA Approvals, along with Wildlife Act and HNZPT Act approvals, the Application is not considered to raise any legal complexities beyond those that would commonly be encountered in resource consent applications of this nature and scale. Put another way, it does not give rise to any novel or difficult legal issues that might be unfamiliar to experienced resource management practitioners.
11. **Evidentiary Complexity:**
 - (a) A significant volume of expert reports/evidence has been provided in support of the application. Peer reviews have also been provided in relation to landscape, transportation, economic impact assessment, stormwater, water supply, wastewater treatment plant design.

- (b) Having said that, the material is consistent with what is typically provided for an application for development of this type and scale. It has been prepared by leading specialists in their fields, each with extensive experience of projects of this scale and complexity. In that regard, the material is not considered to be unusually onerous in terms of volume, or in terms of complexity of the matters that it addresses. None of the issues raised are novel evidential issues in a comprehensive mixed-use development with a proposal for onsite water and wastewater infrastructure.
- (c) We anticipate that the Expert Panel will need to engage with and consider differences of opinion in relation to the following matters:
 - (i) Landscape;
 - (ii) Traffic;
 - (iii) Economic benefits;
 - (iv) Strategic planning.

12. **Factual Complexity:**

- (a) As indicated above there is a reasonable volume of expert reports/evidence, but no special or unusual issues are anticipated or identified through these reports or the peer reviews undertaken.
- (b) There is expert opinion in specialised fields, such as infrastructure servicing and ecology, and analysis of that evidence will be required

Issues

13. The issues that have arisen during pre-lodgement and post-lodgement consultation and engagement generally relate to strategic planning, landscape and transport issues. We anticipate that these are likely to be central to the Expert Panel's consideration of the Project. Specifically:

- (a) The Site being located within the Wakatipu Basin Rural Amenity Zone and the Rural Zone, and the relevance of this to the urban nature of the project.
- (b) The presence of the outstanding Natural Landscape and Outstanding Natural Feature overlays associated with Morven Hill and the Kawarau River corridor, which adjoin and, in some instances, cross, the project site and the impact of the project on the landscape values associated with these.
- (c) The appropriateness of the proposed offsite transport upgrades to accommodate development traffic on an already constrained transport network.

Mātauranga and tikanga

14. This is an issue for Iwi authorities and Treaty settlement entities to address.

Panel Membership

15. The Applicant respectfully suggests that the Panel Convener convene a panel comprised of persons with the following expertise, knowledge and experience:
- (a) an experienced planner and/or lawyer with experience in residential developments; and
 - (b) Infrastructure.
16. The Applicant does not consider any factors warrant the appointment of more than three Panel members.

Procedural requirements

17. The Applicant is willing to engage directly with the Panel as necessary to advance progress of the application efficiently (e.g.: through briefings, meetings and conferences) and considers that such engagement is likely to be the most efficient and effective way to clarify and address issues.

18. It is not possible at this stage to identify whether any form of hearing process will be required. The Applicant considers witness caucusing on any technical matters in dispute may be beneficial.

Time Frames

19. The Applicant's estimate timeframe is set out in **Appendix B** to this memorandum.
20. It is difficult to identify at this stage the time that will be required for each step, but the Applicant makes the following high-level observations:
- (a) The Application contains extensive information, and it is acknowledged that interested parties and the Panel will need sufficient time to review that material, to consider whether all necessary information is available, and to identify any additional material they may wish to see.
 - (b) It will be desirable to ensure that the terms of any grant of consent are complete and well drafted. Opportunities for parties and the Panel to work collectively through the wording (including through mediation or a settlement conference) are likely to be helpful and have been factored into the timetable.
 - (c) In that context, the Applicant considers that an extension of the standard 30 working day period after the date specified for receiving comments under section 53 to **50 working days** would be suitable and fair in the case of the Ridgeburn project.
21. The Applicant does not raise any other issues at this stage.

DATED this 29th day of June 2026



Jeremy Brabant / Alex Devine
Counsel for Ridgeburn Limited

Appendix A

Post Lodgement Consultation Summary

Heritage New Zealand Pouhere Taonga (HNZPT)

- **14 May 2026:** Lodgement of the application was confirmed by the Applicant's consultants. They also invited HNZPT to contact them should they require any further information during the assessment process or have any questions regarding the application as lodged.

Department of Conservation (DOC)

- **14 May 2026:** Lodgement of the application was confirmed by the Applicant's consultants. They also invited DOC to contact them should they require any further information during the assessment process or have any questions regarding the application as lodged.
- **25 June 2026:** DOC requested clarification on the Assessment of Environmental Effects (AEE) following the reloaded application documents (following completeness). A response to DOC was provided on **29 June 2026**.

Queenstown Lakes District Council (QLDC)

- **19 May 2026:** The Applicant's consultants emailed QLDC requesting an initial meeting with the Council officer or consultant planner assigned to the application following the acceptance period. The purpose of the meeting was to engage constructively throughout the substantive process, discuss any matters Council considered would assist with the assessment, explore opportunities for alignment where appropriate, and workshop draft consent conditions.
- **16 June 2026:** Initial post lodgement meeting held with QLDC planners to discuss ongoing consultation, information requirements, and any clarifications on the substantive application.
- **22 June 2026:** Meeting held with QLDC Landscape Architect, Consultant Planner and Internal Planner (Marcus Langman, and Onur Oktem) to discuss the site visit, information requirements, and any clarifications on the substantive application.
- **25 June 2026:** A site visit was undertaken with QLDC's Landscape Architect (Bridget Gilbert), the Applicant's planner and the Applicant. Council's Consultant planner (Marcus Langman) had intended to attend but was unable to do so after his flight was diverted.

- **Late June 2026.** Weekly meetings have since been established to facilitate ongoing collaboration and enable prompt resolution of any issues raised during the application process.

Otago Regional Council (ORC)

- **19 May 2026:** The Applicant's consultants emailed ORC requesting an initial meeting with the Council officer or consultant planner assigned to the application following the acceptance period. The purpose of the meeting was to engage constructively throughout the substantive process, discuss any matters Council considered would assist with the assessment, explore opportunities for alignment where appropriate, and workshop draft consent conditions.
- **26 June 2026:** ORC issued a further information request resulting from specialist expert reviews. ORC offered to meet the Applicant's consultants to discuss further information points, as needed.
- **26 June 2026:** The Applicant's consultants responded to ORC's further information request, advising that the Applicant team would work through the matters raised and requesting meetings in due course to discuss the relevant issues.

Te Ao Mārama Inc. / Kāi Tahu (TAMI)

- **14 June 2026:** A mitigation table provided to TAMI by the Applicant's consultants which intended to address matters raised in the Cultural Impact Assessment.
- **19 June 2026:** Updated mitigation table sent to TAMI, following initial comments from TAMI.
- **May/ June 2026:** Various meetings held with TAMI to discuss proposed mitigation measures and draft consent conditions.

New Zealand Transport Agency Waka Kotahi (NZTA)

- **19 June 2026:** The Applicant's consultants emailed NZTA to request a meeting regarding the application as lodged, and proposed upgrades.
- **23 June 2026:** Online meeting held with NZTA and the Applicant's consultants to discuss proposed roading upgrades and NZTA's initial review of the application.

Appendix B
Estimated timeframe

Step	Task	Working days	Date
1.	Panel commencement	N/A	17 July 2026 (nominal)
2.	Invite comment from relevant parties	10 W/D later	31 July 2026
3.	Comments close (ss 53 & 54)	20 W/D after step 2	28 August 2026
4.	Comments close for applicants (s 55)	5 W/D after step 3	4 September 2026
5.	[<i>New step</i>] Mediation, expert conferencing or other processes to resolve matters of contention	5 W/D after step 4 (assumption)	11 September 2026
6.	Any other procedural steps, evaluation and decision writing	10 W/D after step 5 (assumption)	25 September 2026
Draft decision is to approve			
7.	Draft decision and conditions to Ministers (s 72)	5 W/D after step 6 (assumption)	2 October 2026
8.	Response from Ministers (s 72)	10 W/D after step 7 later	16 October 2026
9.	Applicant response to Ministers comments (if any)	10 W/D after step 8 (assumption)	30 October 2026
10.	Draft conditions and decision to participants (s 70(1))	5 W/D after step 7 (assumption)	9 October 2026
11.	Participant comments on draft conditions (s 70(2))	5 W/D after step 10 (assumption)	16 October 2026
12.	Applicant response to participants on conditions (s70(4))	5 W/D after step 11	23 October 2026
13.	If not agreed, procedural step in relation to draft conditions	5 W/D after step 12 (assumption)	2 November 2026
14.	Evaluate and finalise decision	5 W/D after step 13 (assumption)	9 November 2026
15.	Decision release	50 W/D after step 3 (assumption)	9 November 2026