



# Fast-track Approvals Act 2024 Referral Application

## SIMPLICITY LIVING TE PŪTAHI LADIES MILE

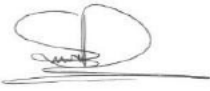

April 2026

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Prepared for Simplicity Living Limited



**Quality control**

<b>Title:</b>	Fast-track Approvals Act 2024 Referral Application
<b>Client:</b>	Simplicity Living Limited
<b>Job number:</b>	720422
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<b>Signature:</b>	
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## Information required in an FTAA referral application ([Section 13\(4\)](#))

Section	Section wording	Corresponding report section
a	a description of the project and the activities it involves:	Section 1 and 3
b	an explanation of how the project meets the criteria in <a href="#">Section 22</a>	Section 5.1
c	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24):	Section 5.2
d	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application:	Section 2 and Appendix 1
e	the anticipated commencement and completion dates for construction activities (where relevant):	Section 1.1
f	a statement of whether the project is planned to proceed in stages and, if so,— (i) an outline of the nature and timing of the stages; and (ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and (iii) an explanation of how each stage meets the criteria in section 22:	Section 3.3
g	a statement of whether a part of the project is proposed as an alternative project in itself and, if so,— (i) a description of that part of the project; and (ii) an explanation of how that part of the project meets the criteria in section 22:	Section 3.3
h	a description of the anticipated and known adverse effects of the project on the environment:	Section 6
i	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991:	Section 4.1
j	a list of the persons and groups the applicant considers are likely to be affected by the project, including— (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:	Section 7 and Appendix 13
k	a summary of— (i) the consultation undertaken for the purposes of section 11 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	Section 7.1 and 7.2 and Appendix 13
l	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements:	Section 7.3
m	a description of any processes already undertaken under the <a href="#">Public Works Act 1981</a> in relation to the project:	Section 4.5

Section	Section wording	Corresponding report section
n	a statement of any relevant principles or provisions in the <u>Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019</u> :	Section 7.3 and Section 6
o	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area:	Section 5.2; Section 7.3 and Section 6
s	a description of the applicant's legal interest (if any), or if the referral application is lodged by more than 1 person, the legal interest of any of those persons (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work:	Section 2.1
t	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant:	Section 0
u	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:	Section 3.3
v	a description of whether and how the project would be affected by climate change and natural hazards:	Climate change – section 5.1, 6.2 Natural hazards – section 2.1 and 8.1.6
x	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the referral application is lodged by more than 1 person, any of those persons) under a specified Act:	Section 4.6
y(i)	if the proposed approvals include— (i) an approval described in <u>section 42(4)(a) or (d)</u> (resource consent or designation), the information specified in <u>clause 2</u> of Schedule 5:	Section 4.7
Clause 2 Schedule 5	(1) The information required to be provided under <u>section 13(4)(y)(i)</u> is— (a) an assessment of the project against— (i). any relevant national policy statement; and (ii). any relevant national environmental standards; and (iii). if relevant, the New Zealand Coastal Policy Statement; and (b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in <u>section 30(3)(a)</u> .	(1)(a) - Section 8 (1)(b) – No regional consents exist for the site
y(iv)	if the proposed approvals include— an approval described in <u>section 42(4)(e)</u> (concession), the information specified in <u>clause 2</u> of Schedule 6:	Section 4.7
Clause 2 Schedule 6	(1) The information in subclause (2) is required to be provided under <u>section 13(4)(y)(iv)</u> if a proposed concession includes a lease and— (a) the lease would be for a term (including any renewals) that will, or is likely to, be more than 50 years; and (b) the granting of the lease would trigger a right of first refusal or a right of offer or return. (2) The information is confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.	Section 4.7

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# 1. PROJECT OVERVIEW

## 1.1 Introduction

This Planning Report forms part of the referral application lodged on behalf of Simplicity Living Limited (“SLL” or “the applicant”) for its development known as Simplicity Living - Te Pūtahi Ladies Mile (Project). It has been prepared to provide additional detail and assessment in support of the prescribed Referral Application Form and is structured to demonstrate compliance with each of the specific information requirements of Section 13 of the Fast-track Approvals Act 2024 (FTAA).

The purpose of the Project is to provide an integrated residential development, which includes residential subdivision and associated land use for high density, comprehensively designed multi-unit development at 12 Lower Shotover Road, Queenstown (Lot 3 DP 606744, Lot 2 DP 617529 and Section 9 SO 485598) (the ‘Site’). The Project will also include commercial and retail activities within a local shopping centre, associated enabling works, and necessary infrastructure (including roading and three waters services both internal and external to the Site). A Project overview is outlined within **Table 1** below, with further details presented in the subsequent sections of this Planning Report.

This referral application seeks to progress a uniquely community-focused development at Ladies Mile, centred on SLL's build-to-rent model and delivered at a scale that can make a meaningful difference to Queenstown's housing pressures. The Project will have significant regional benefits for Queenstown and will significantly increase housing supply and housing choice in the area. If fast-track consent is granted, SLL intends to commence construction immediately (ideally in October 2026) and deliver the Project by December 2030. The Project is anticipated to generate expenditure of approximately \$1,006 million in total economic activity across New Zealand over 2025-2030. The Project will also contribute to approximately 3,036 jobs nationally during the construction period. Post-construction, the Project is expected to support 40–50 permanent FTEs through ongoing property management and maintenance associated with the build-to-rent model.

SLL is seeking approvals for this Project under the Fast-track process to provide certainty of timing and delivery for its Project which is already well progressed in design, infrastructure-aligned, and genuinely shovel-ready - thereby enabling construction to commence at pace as soon as approvals are secured.

SLL has engaged a team of experienced experts to assess the potential effects of the Project and inform this referral application. A number of these reports are provided with this application.

**TABLE 1: PROJECT OVERVIEW**

<p><b>Applicant</b></p>	<p>Simplicity Living Limited</p>
<p><b>Project summary</b></p>	<p>The key components of the project include:</p> <ul style="list-style-type: none"> <li>• The delivery of approximately 1100 residential units within a mix of three level walk-up apartments and five to seven level apartment buildings.</li> <li>• Resident community facilities including community rooms, open spaces and parks.</li> <li>• A development Lot providing a local shopping centre, enabling commercial and retail activities.</li> <li>• Associated bulk earthworks including earthworks for residential purposes, landscaping, and infrastructure development internally and externally to the Site, including the construction of new roads, a signalised intersection and bus lane on State Highway 6 (SH6), and earthworks for the provision of underground utilities.</li> <li>• The provision of new, and upgrades to existing, three waters infrastructure, including in relation to stormwater management, water supply services and wastewater services (both internal and external to the Site).</li> <li>• Fee simple subdivision to create development lots, and roads and park to vest in Council.</li> <li>• Unit title subdivision of all walk-up and apartment blocks.</li> </ul> <p><u>Section 3</u> of this Report provides further detail on the proposed works, while <u>Section 4</u> outlines the range of statutory approvals required and sought as part of the referral application.</p> <p>The Simplicity Living Te Pūtahi Ladies Mile masterplan is shown in <b>Figure 1</b> below.</p>
<p><b>Site Details</b></p>	<p>The subject Site has an area of approximately 10.01 hectares, and is located at 12 Lower Shotover Road, northeast of the commercial centre of Frankton, Queenstown.</p> <p>The Site is inclusive of three titles being Lot 3 DP 606744, Lot 2 DP 617529 and Section 9 SO 485598.</p> <p>Section 2 of this Planning Report outlines the characteristics of the Site, including the legal descriptions, ownership details, and relevant statutory classifications of the land parcels. It also identifies key planning features such as zoning, overlays, and other provisions relevant to the Project. In addition, Section 2 describes the receiving environment, with particular</p>

	reference to existing resource consents, and provides an overview of the plan change that established the urban zoning across the Site.
<b>Consents required</b>	<p>The Project requires approvals under the Resource Management Act 1991 (RMA), comprising district consents for subdivision, land use, utilities and earthworks, internal and external to the Site, under the Queenstown Lakes Proposed District Plan (PDP), and regional consents for earthworks for residential purposes and discharge of stormwater to land and water under the Otago Regional Plan: Water (ORPW).</p> <p>The Project may also require a concession under the Conservation Act from the Department of Conservation for a water pipe through an existing reserve and under the Reserves Act to enable Council trunk infrastructure to pass through council reserves.</p> <p>A precautionary allowance has been made for the potential need for approval under section 53 of the Wildlife Act 1953, should the installation of the water pipeline across DOC-administered land interact with indigenous lizards, vegetation and birds.</p> <p>All resource consents and concessions required to facilitate the project are proposed through the FTAA process.</p>
<b>Local Authorities</b>	<p>Otago Regional Council (ORC)</p> <p>Queenstown Lakes District Council (QLDC)</p>
<b>Relevant Administering Agencies</b>	Department of Conservation (DoC)
<b>Relevant Iwi Authorities</b>	<p>Te Rūnanga o Ngāi Tahu</p> <p>Aukaha</p> <p>Te Ao Mārama Incorporated</p>
<b>Other Relevant Agencies / Groups</b>	<p>Ministry of Education (MoE)</p> <p>Waka Kotahi New Zealand Transport Agency (NZTA)</p>



**FIGURE 1: SIMPLICITY LIVING TE PŪTAHI LADIES MILE MASTERPLAN. SOURCE: BREWER DAVIDSON. SEE APPENDIX 5 FOR FULL PLAN SET.**

## 1.2 Report Structure

This report is structured as follows:

- Section 1 – Project Overview
- Section 2 – Site Context
- Section 3 – Project Description
- Section 4 – Approvals Sought
- Section 5 – Appropriateness for Fast-track Approvals Process
- Section 6 – Environmental Effects of Project
- Section 7 – Consultation & Persons and Groups Affected
- Section 8 – Statutory Framework
- Section 9 – Conclusion

A number of attachments are provided in support of this application and referenced throughout, with these providing a comprehensive appraisal of the Project suitable for the referral phase and associated relevant provisions of the FTAA.

## 2. SITE CONTEXT

### 2.1. Site Description

The Site is located at 12 Lower Shotover Road, Queenstown (Lot 3 DP 606744, Lot 2 DP 617529 and Section 9 SO 485598). It is situated northeast of the commercial centre of Frankton, Queenstown, along State Highway 6. **Appendix 1** and **Figure 2** below illustrates the Site within the existing environment.

The Site has an area of 10.0053 hectares, and is predominantly covered by pastoral grasses, with some isolated shrubs and trees and shelterbelts. The contour of the Site is generally flat or gently undulating. An earth bund is situated along the boundary of the Site with Lower Shotover Road and Frankton-Ladies Mile Highway. The Site is currently used for grazing and it contains a residential dwelling in the north.

Existing access to the Site is provided by two vehicle crossings via Lower Shotover Road and Frankton-Ladies Mile Highway respectively. A paper road traverses the northern part of the Site orientated west to east.

There are no rivers, watercourses or wetlands that traverse the Site.

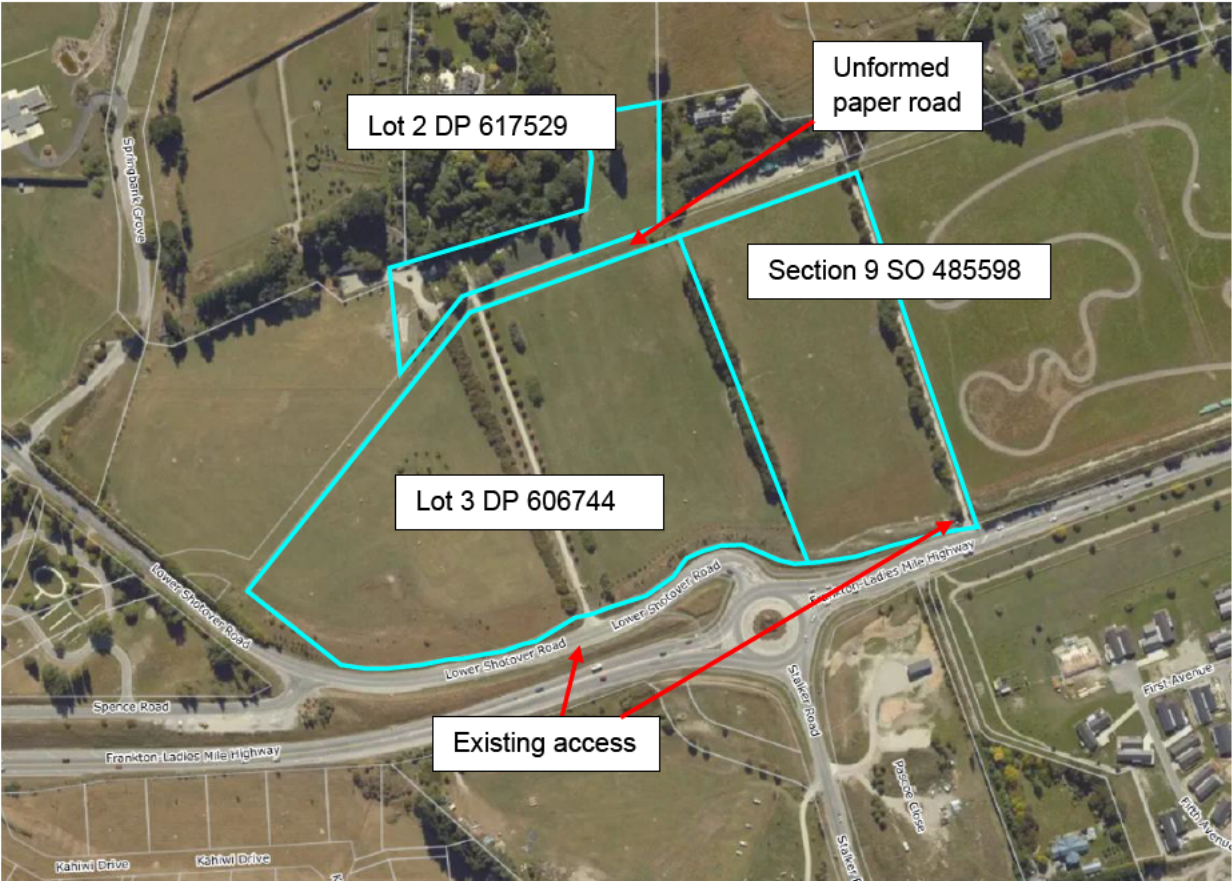


FIGURE 2: SITE OUTLINED IN BLUE. SOURCE: GRIP MAPS.

### Titles & Ownership

The Site is made up of three lots held within three corresponding Records of Title. Refer to **Table 2** for the details of each lot. There are consent notices and easements registered on the titles, a copy of the titles and relevant interests are provided in **Appendix 2**.

**TABLE 2: RECORDS OF TITLE**

**Record of Title Details**

s 9(2)(a)

The paper road which traverses the Site separates Lot 2 DP 617529 from Lot 3 DP 606744 and Section 9 SO 485598, as shown in **Figure 2**.

Simplicity owns the majority of the land subject to the Project and has entered into a Sale and Purchase Agreement for the remaining land. Section 9 SO 485598 is a single land parcel held within a larger Record of Title. A minor boundary adjustment is currently being progressed by the vendor to incorporate Section 9 SO 485598 into Lot 3 DP 606744.

A letter confirming SLL is the purchaser of the Section 9 land under a conditional sale agreement is contained within **Appendix 2**.

### **Legal Instruments**

There are several legal instruments registered on the respective titles, which have been summarised in **Appendix 2** to this application. These instruments are not impediments to the Project, and consideration will be given during detailed design as to whether the Site and design could be optimised further by varying or removing some of these instruments. Other easements may be surrendered to create a clean title but none of these instruments prevent the Project from proceeding.

Consent Notice 12669287.3 currently requires all future residential units to be contained within a single residential building platform, reflecting the site's former rural lifestyle zoning. With the recent plan variation rezoning the land for urban development, this restriction is now outdated. Accordingly, removal of the consent notice is expected to be a straightforward process under section 221 of the Resource Management Act 1991.

Consent Notice 13434438.6 applies only to Lot 2 and requires future development to provide a site-specific stormwater design, participate in any private infrastructure management entity, ensure continuity of that entity, and install compliant firefighting water supply. These conditions relate to an earlier subdivision consent and are tied to interim, private-serviced development. They are not relevant to the current Project, which will be fully connected to public reticulated water, wastewater, and an integrated stormwater network. Once the wider development proceeds under new consents and all services are vested or connected to Council infrastructure, this consent notice will effectively become obsolete, and can be removed under section 221 of the Resource Management Act 1991.

Consent Notices 7620262.11 and 876500 have carried over from earlier subdivisions. They are not relevant to the land within the Project Area, and their removal is expected to be a straightforward process under section 221 of the Resource Management Act 1991.

### **Existing Infrastructure**

The Site is currently undeveloped and largely devoid of internal infrastructure.

Whilst the Site is not currently serviced to the capacity required for the proposed development, it is strategically positioned within an area already supported by significant three-waters infrastructure. Its proximity to major existing networks makes it far more feasible to service than more isolated greenfield areas. Although underground power and telecommunications are not yet established on the land, these services are readily accessible in the surrounding network. Collectively, this infrastructure context reinforces why the Site was recently rezoned for urban development and highlights its suitability as a logical, well-supported location for strategic growth.

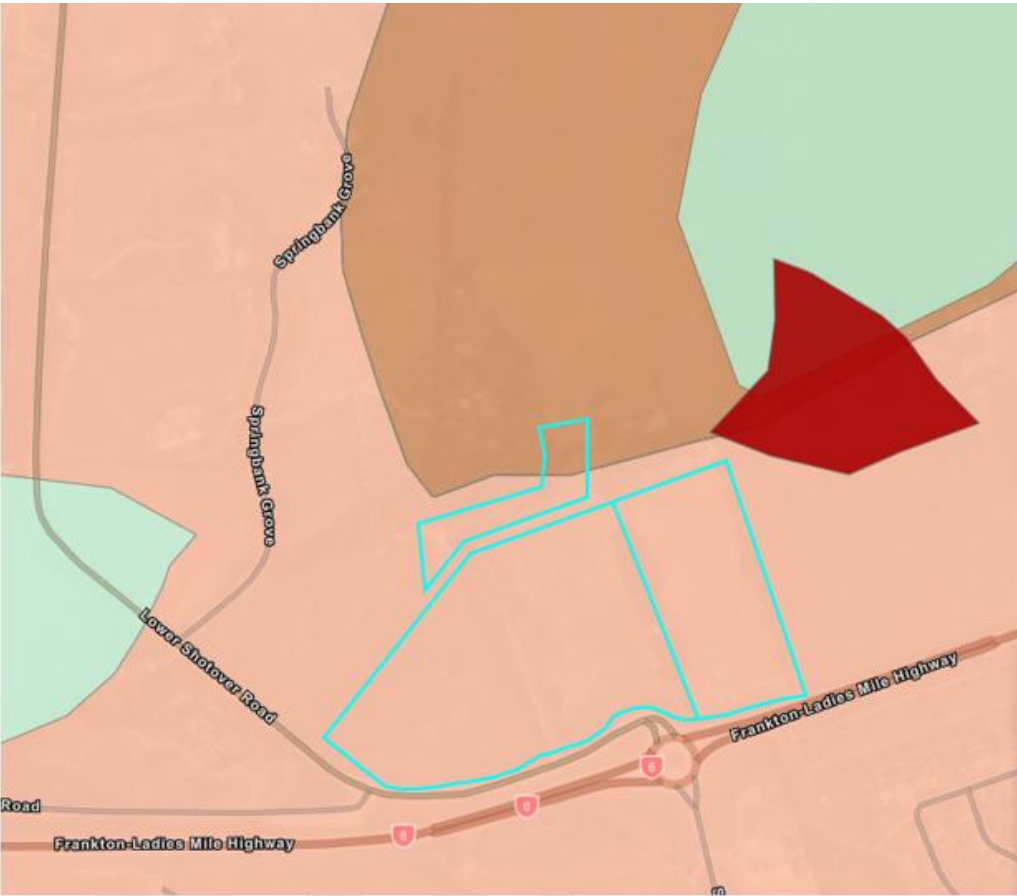
**Natural Hazards**

Extensive review of potential natural hazards was undertaken by QLDC at the time of the plan variation to up-zone the Ladies Mile.

A review of hazard mapping available on the Otago Regional Council’s Natural Hazards Portal indicates that the Site is not subject to significant natural hazard risks. The entire Site is mapped as being within the *Liquefaction Awareness Area – Domain A: Liquefaction Potential: Low to none*. Portions of the Site are also mapped as Ground Classification D (deep or soft soil) and Ground Classification B (rock), as shown in **Figure 3**.

The ORC Natural Hazards Portal further identifies the Site as being outside all alluvial fan and slope hazard zones, with no regionally identified flood risk.

Seismic risk is consistent with the wider Queenstown basin and does not present any additional constraint to development.



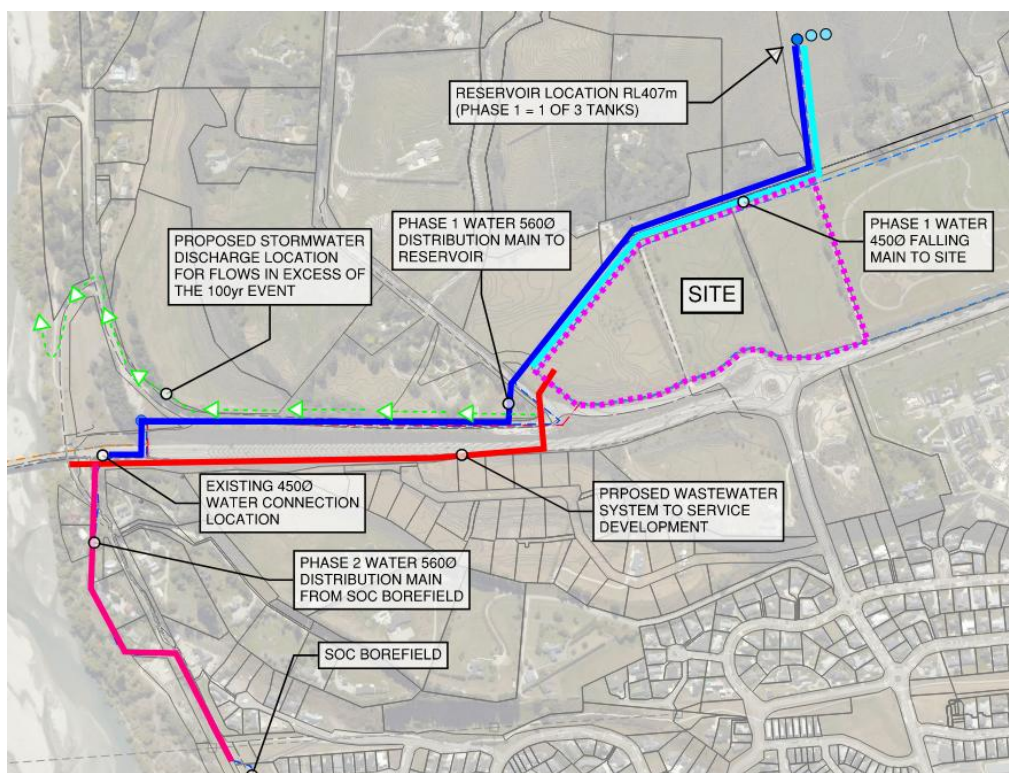
**FIGURE 3: NATURAL HAZARDS MAP. SITE OUTLINED IN LIGHT BLUE. PINK = GROUND CLASSIFICATION D, BROWN = GROUND CLASSIFICATION B, RED = ALLUVIAL FAN (ACTIVE DEBRIS DOMINATED), GREEN = LANDSLIDES. SOURCE: ORC NATURAL HAZARDS PORTAL.**

## 2.2. Works External to the Site

While the subdivision and land use outcomes of the Project are principally contained within the boundaries of the land under the control of SLL, it is noted that several ancillary works are proposed as part of the Project on land beyond the Site (refer **Figure 4**), including:

- Upgrades to the SH6 Network to signalise an existing roundabout.
- Establishing a new bus lane along the SH6 from the Site to the Shotover Bridge.
- Upgrades to the QLDC roading network.
- Installation of trunk infrastructure within QLDC and NZTA controlled roading networks and reserves.
- Potential installation of three waters infrastructure within Department of Conservation managed land and reserve land.
- The discharge of stormwater to land where it may enter a waterway in a higher than 1% AEP storm event.

Direct consultation has been, and will continue to be, undertaken with the relevant local authorities and administering agencies, including DoC, in accordance with section 11 of the FTAA. The works outlined above (and detailed further in Section 3 below) reflect the current servicing approach proposed by these authorities, but as investigations progress and detailed design develops, alternative infrastructure solutions may be explored where they better meet the needs or preferences of the parties involved. This list should therefore be viewed as indicative, demonstrating that the appropriate agencies are already engaged and working together, with the servicing strategy expected to refine as the process continues.



**FIGURE 4: WIDER SITE FOR EXTERNAL 3WATERS INFRASTRUCTURE WORKS**

## 2.3. Location Context

The Site is located centrally within the Whakatipu Basin, at the base of Slope Hill. The local environment is considered the terraced area to the east of the Shotover River and west of Lake Hayes. Ladies Mile is conveniently located, and is, to a large extent, surrounded by existing developed areas. It is in proximity to Five Mile and Frankton Flats, both business mixed use and industrial areas.

This area contains a large amount of established urban development, including the suburban developments known as Shotover Country, Lake Hayes Estate, Bridesdale, Kawarau Heights and the retirement village, Queenstown Country Club. The locality consists of a mix of residential dwelling typologies and densities, commercial and recreational services and facilities, aged care with medical facilities, childcare and a school.

Almost all of this development is located south of SH6, and has rapidly occurred since 2005. The northern side of SH6 currently exhibits a mix of uses, including a pet lodge, rural living and farming activities.

The land north of SH6 is one of the few undeveloped areas remaining in Queenstown that can be connected to major infrastructure relatively easily. Ladies Mile also lies on the main transport corridor into Queenstown, thus making public transport connections more attractive and likely to be well utilised. For these reasons, developing at scale along Ladies Mile has long been recognised as an appropriate outcome for the District.

The environment is therefore anticipated to change significantly in anticipation of extensive urban expansion, as part of a broader strategic development framework.

The surrounding environment comprises similarly sized lots within the Te Pūtahi Ladies Mile (TPLM) Zone. The site adjacent to the west has obtained various consent approvals to enable approximately 287 residential units<sup>1</sup>.

## 2.4. District Plan

### 2.4.1. Overview

The Site sits within the Te Pūtahi Ladies Mile area, a special-purpose zone established through the Te Pūtahi Ladies Mile Plan Variation to the QLDC Proposed District Plan (PDP). This rezoning covers around 120 hectares of former rural, rural lifestyle, and large lot residential land along State Highway 6 between the Shotover River and Waiwhakaata Lake Hayes. It enables predominantly medium and high density residential development and is specifically intended to support Queenstown's strategic growth needs by increasing housing supply, improving housing diversity, and contributing to greater affordability across the district.<sup>2</sup>

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<sup>1</sup> QLDC Resource Consent, reference RM241049

<sup>2</sup> <https://www.qldc.govt.nz/media/ok2n2jak/final-report-and-recommendations.pdf>

Ladies Mile has long been identified as a strategically important growth area due to its proximity to Queenstown, access to State Highway 6, and capacity to accommodate urban development *at scale*.

The overarching purpose of the Te Pūtahi Ladies Development Plan Variation is to facilitate significant residential growth to address Queenstown's housing shortage. The Plan Change establishes a clear and deliberate shift in land use within the Te Pūtahi Ladies Mile Zone, especially on the northern side of State Highway 6, recognising that a transition from predominantly pastoral landscape to a dense urban environment is both anticipated and necessary to meet the minimum density requirements of the area.

Chapter 49.1 (Te Pūtahi Ladies Mile Zone – Zone Purpose) outlines an explicit expectation of urban change on the northern side of SH6, with a strong emphasis on compact, higher density development generally *at a minimum* of medium to high density scale. This approach seeks to ensure the efficient use of land and infrastructure, and enable the creation of well-designed, connected neighbourhoods supported by open space, transport networks, and community infrastructure.

The Te Pūtahi Ladies Mile Structure Plan (**Figure 5** below) provides a clear strategic framework that not only enables development within Ladies Mile, but actively encourages high quality, high density, integrated urban outcomes. Development within this area is a key component of the District's growth strategy and plays an essential role in delivering new housing, supporting community wellbeing, and shaping a sustainable urban environment for the future

Following a structure planning process, QLDC adopted the Te Pūtahi Ladies Mile Plan Variation for notification under the Streamlined Planning Process. The Plan Variation amended the Urban Growth Boundary (UGB) and introduced the Te Pūtahi Ladies Mile Zone as a new Special Purpose Zone within the Proposed District Plan. The Te Pūtahi Ladies Mile Plan Variation was made operative on 6 December 2024.

## Te Pūtahi Ladies Mile Structure Plan - General

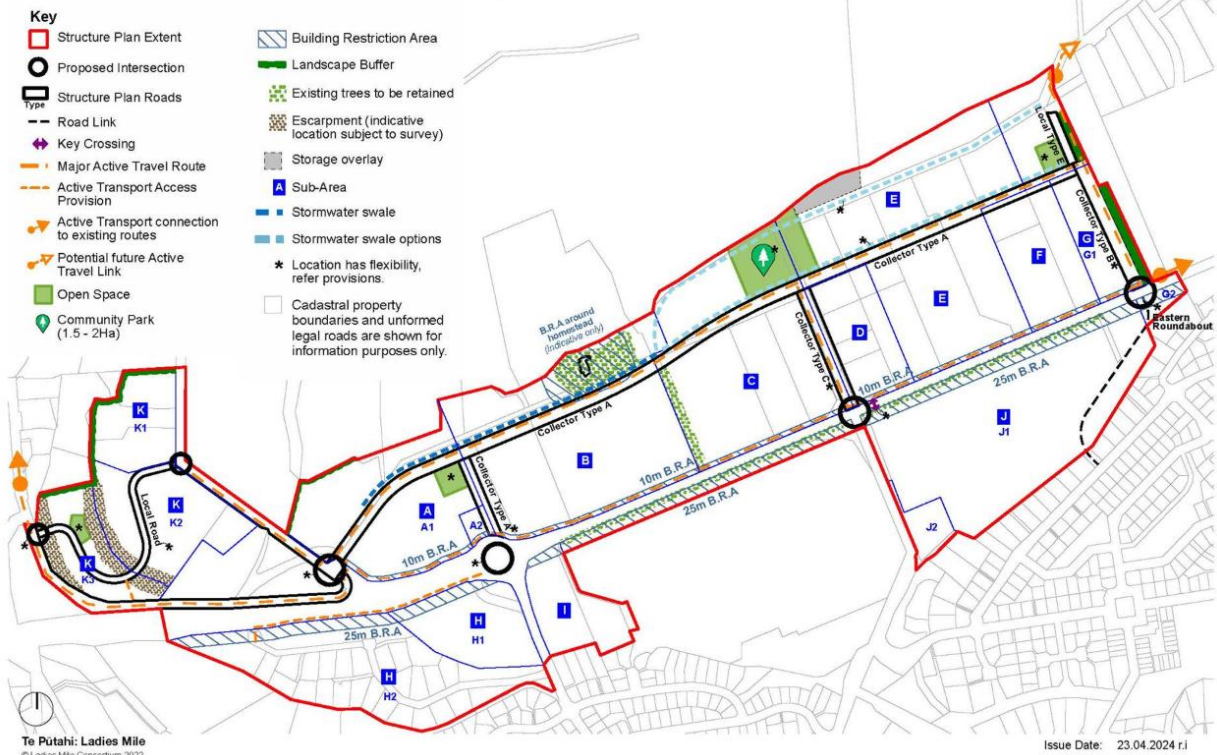
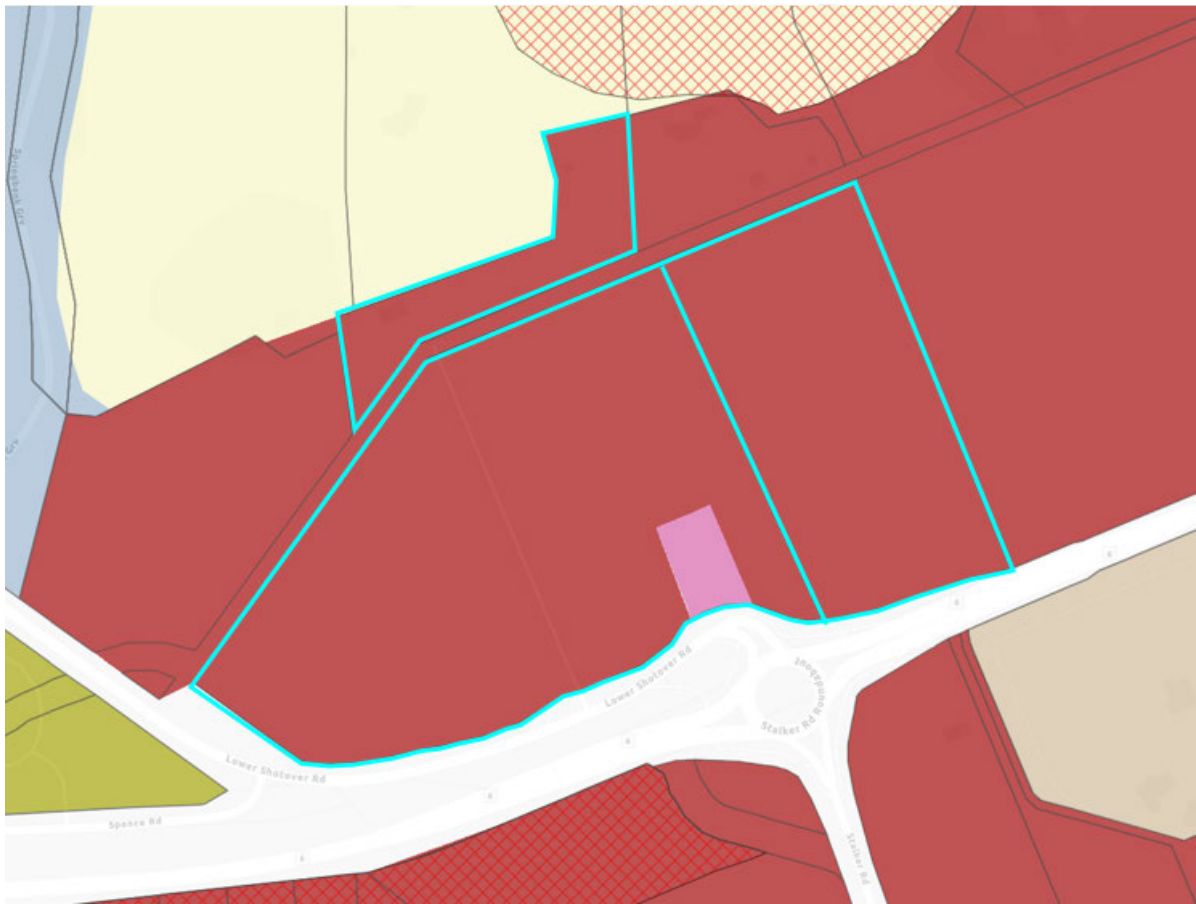


FIGURE 5: TPLM STRUCTURE PLAN. SOURCE: QLDC PDP EPLAN

### 2.4.2. Zoning and overlays

The subject Site is within the TPLM Zone, a Special Purpose Zone within the Queenstown Lakes Proposed District Plan, with a small section of the Site near the southeastern corner identified as a Local Shopping Centre Zone. See **Figure 6** below. The Site is largely identified as Te Pūtahi Ladies Mile – Medium Density Residential Precinct, Sub-area A and Sub-Area B and is partially subject to a Building Restriction Area overlay affecting the southernmost border of the Site adjacent to Lower Shotover Road and State Highway 6. See **Figure 7** below.

The Site sits within the Urban Growth Boundary identified as Lake Hayes Estate & Shotover Country.



**FIGURE 6: SITE OUTLINED IN LIGHT BLUE. RED = TE PŪTAHI LADIES MILE ZONE, PINK = LOCAL SHOPPING CENTRE ZONE. SOURCE: QUEENSTOWN LAKES PROPOSED DISTRICT PLAN.**



**FIGURE 7: SITE OUTLINED IN LIGHT BLUE. ORANGE = TE PŪTAHI LADIES MILE – MEDIUM DENSITY RESIDENTIAL PRECINCT, BLUE DASH = BUILDING RESTRICTION AREA. RED DASHED LINE = URBAN GROWTH BOUNDARY. SOURCE: QUEENSTOWN LAKES PROPOSED DISTRICT PLAN.**

### 3. PROJECT DESCRIPTION (Section 13(4)(a))

#### 3.1. Overview

The Project seeks approval under the FTAA for a comprehensively master-planned residential neighbourhood that will deliver a build-to-rent development, significantly contributing to the housing supply in the Queenstown Lakes District. The development will be the first large scale, comprehensively designed rental community in Queenstown.

The Project will deliver approximately 1100 new homes supported by community facilities, transport infrastructure, open space, and a small scale commercial area (local shopping centre). The Project integrates land use, subdivision, earthworks, and infrastructure (including roading and three waters services) to deliver a high-quality, higher-density residential community aligned with long-term growth objectives for the District.

Key components of the Project include:

- 1100 rental apartments in a mix of three level walk-up apartments and five to seven level apartment buildings;
- Four resident community buildings, including work-from-home spaces, indoor recreation and family spaces;
- A development Lot providing a local shopping centre, enabling commercial and retail activities at the corner of Lower Shotover Road and the proposed east-west collector road (Road C1);
- A Local Park to be vested to QLDC on the north side of Road C1 which includes a level active open space along the street frontage and activities on the bush planted slope above;
- Retention of the existing 'barn' on the north side of Road C1 to house a leasing office and café;
- Two parking garages with 618 carparks, 88 motorbike parks and 872 bicycle parks;
- The construction of Road C1 through the site, new internal private roads, upgraded accessways on Lower Shotover Road and Spence Road; and a signalised intersection and bus lane on State Highway 6 (SH6).
- Shared paths on State Highway 6 (SH6), the Road C1 and a central mid-block path aligned with the neighbouring land to the east.
- Associated bulk earthworks including earthworks for residential purposes, landscaping, and infrastructure development (roading and utilities) internally and externally to the Site).
- The provision of new, and upgrades to existing, three waters infrastructure, including in relation to stormwater management, water supply services and wastewater services (both internal and external to the Site). Including any associated discharge consents.
- Fee simple subdivision to create development lots, and roads and park to vest in Council.

- Unit title subdivision of all walk-up and apartment blocks.

### 3.2. Simplicity Living Build to Rent Ethos

SLL is wholly owned by the Simplicity Property Fund, a wholesale investment fund managed by Simplicity Investment Management Limited. Funds within various managed investment schemes is governed by the Financial Markets Conduct Act and supervised by Public Trust. Simplicity NZ Limited is manager of the schemes and is a registered Managed Investment Scheme manager. The total value of the combined schemes is currently \$10.3bn and membership base is currently 184,000 from across New Zealand.

SLL develops affordable housing designed for long term residency in a build-to-rent model. The company's core objective is to increase the supply of well-designed homes that support community wellbeing while maintaining long-term ownership and stewardship of its developments. This approach enables a consistent focus on quality, liveability, and long-term performance of residential environments rather than short term market outcomes.

SLL developments are typically medium to high density residential projects close to public transport, services and amenities to support efficient land use. A strong emphasis is placed on simplicity of design, quality construction, and longevity. Buildings are designed to be warm, healthy, and energy-efficient, with internal layouts that accommodate a range of household types and life stages.

Unlike conventional residential developers, SLL retains ownership of its housing stock and manages the properties over the long term. This development model incentivises careful design, robust construction, and ongoing investment in the quality of the living environment for residents. As a result, SLL developments are intended to make a positive and enduring contribution to both resident wellbeing and wider neighbourhood.

A Capability Statement for SLL is provided at **Appendix 3**. The report demonstrates that SLL has the financial backing, organisational structure, systems, experience, and delivery capacity to undertake large-scale build-to-rent housing developments.

### 3.3. Staging

In accordance with section 13(4)(f), the SLL confirms that the project is proposed to proceed as a single stage, while physical construction will be undertaken in a logical sequence as set out below. Only one substantive application will be made if the Project is successfully referred for consideration under the FTAA.

In accordance with section 13(4)(g), the project, or any part of it, is not proposed as an alternative project.

Simplicity Living operates as an integrated developer, builder, and long-term owner, enabling full control over delivery, programme, and sequencing. A Project Delivery and Timeframe Report is attached at **Appendix 4**. The report outlines the proposed construction delivery programme for the Project.

In summary, the delivery model reflects Simplicity Living's established production-based approach, focused on repeatability, sequencing, quality control, and sustained output at scale.

The Project is structured as a high-efficiency housing delivery system, achieving:

- ~220 apartments delivered per annum;
- 4 to 7 buildings under construction at any one time;
- ~8-month construction duration per building; and
- first dwellings delivered within 12 months of project commencement.

This approach is enabled through early infrastructure provision and a rolling construction methodology. Initial works will focus on establishing key enabling infrastructure, including the primary collector road and associated services, to provide the framework for subsequent development. Once these core elements are in place, earthworks will be undertaken on a block-by-block basis to prepare individual development areas. Building construction will then commence progressively across the Site, with different blocks advancing at slightly different times to allow a rolling delivery program. This approach provides flexibility and supports efficient use of resources.

For completeness it is noted that SLL is also progressing an RMA consent for enabling works limited solely to earthworks across the full Site. This consent is being sought so SLL can commence physical works as soon as practicable and make full use of the 2026/27 summer construction season. The enabling works will ensure the Site is prepared in time to begin building activity in 2027, maintaining programme certainty and avoiding seasonal delays. This will ensure the development can progress at pace, should consents for this Project be approved under the FTAA.

### 3.4. Project Masterplan

The Masterplan for the Project is included in **Figure 8** below:



**FIGURE 8: SIMPLICITY LIVING TE PŪTAHI LADIES MILE MASTERPLAN. SOURCE: BREWER DAVIDSON. SEE APPENDIX 5 FOR FULL PLAN SET.**

The masterplan provides a holistic overview of the internal spatial organisation of the proposed development and demonstrates how built form, movement networks, and open space are integrated to create a cohesive and legible residential development. The layout has been informed by the scale of development anticipated and encouraged within the TPLM Zone, the principles of efficient land use, and the need to deliver high-quality amenity and connectivity.

The masterplan is organised around retaining the existing maple trees as a defining landscape feature, with some trees relocated to form a triangular village green that acts as the central communal space. A residents' pavilion will anchor this green, which is visually connected to the lawn in front of the retained barn across Road C1, creating a linked sequence of open spaces.

Taller apartment buildings are positioned along this central green to maximise outlook and provide immediate access to high-quality open space. The circulation network is designed as a series of narrow, tree-lined streets with indented parking and dedicated pedestrian and cycle paths, reinforcing a townscape character rather than a conventional housing estate dominated by surface parking.

Parking garages, while substantial in scale, are used to significantly reduce at-grade parking and enable the creation of these streets and landscaped internal courtyards. The street network defines a series of housing blocks with enclosed courtyards, supporting a coherent, walkable, and well-structured neighbourhood layout.

Through ongoing consultation, NZTA and QLDC have confirmed they do not support retaining the north-south collector road as a five-leg intersection at SH6. With that road removed, kerbside parking cannot be provided in the original structure plan Local Shopping Centre location, which is critical for neighbourhood-scale retail. As a result, the commercial area is now proposed at the corner of Lower Shotover Road, where viable access and parking can be achieved, as well as walking and cycling for residents.

The Structure Plan proposes an open space at the corner of the collector roads although the legend asterisk indicates that there is flexibility in the final location. A corner is a logical place for a neighbourhood park to provide accessibility and passive surveillance. But if the north-south collector road is not constructed, then a park in this location will have only one street frontage and three private boundaries. The site on the opposite side of the east-west collector road is therefore proposed as a park location as part of this Project. This also has only a single street frontage, but the site extends up the hill and will have a bush covered slope as a backdrop which will provide a better urban design/environmental outcome. The land beside Road C1 is relatively flat and a level active open space will be developed in consultation with QLDC.

The overall masterplan approach is centred on creating a compact, walkable, and high-amenity neighbourhood structured around open space features, a central village green, and a fine-grained street network that prioritises pedestrians and cyclists. While the layout departs from some elements of the TPLM Structure Plan, these refinements are deliberately proposed to achieve a better urban outcome, improving connectivity, enhancing open space quality, and delivering higher amenity for residents. The resulting masterplan aligns closely with the objectives and policies of the TPLM Zone by achieving density, supporting a well-functioning urban environment, and providing a coherent, attractive townscape that reinforces a strong sense of place.

### 3.5. Built Form

Approximately 1100 units are proposed as part of the Project, arranged in a mix of three level walk-up apartments and five to seven level apartment buildings throughout the Site. Building heights range from 3 to 7 storeys (heights ranging approximately 11m to 23m). See visual simulation in **Figure 9** below.

Two parking garages are proposed to accommodate car, motorbikes and bike storage. Various resident community, including a pavilion, outdoor areas with BBQ facilities and various covered bike sheds will be established throughout the neighbourhood.

#### **Apartment Blocks**

The development comprises a mix of three level walk-up apartments and five to seven level apartment buildings, arranged around the roading network and open space areas across the site. The blocks vary in unit composition to provide a mix of housing options, with approximately 50% two-bedroom units, 43% one-bedroom units, and 7% three-bedroom units.

Block heights range from three to seven storeys (heights ranging approximately 11m to 23m), with the taller buildings generally located toward the centreline of the Site. This approach allows building height to be used strategically to achieve residential density while reducing external perceived bulk and maximising open space. Lower scale blocks are located closer to internal boundaries to provide a sensitive interface with the adjacent land.

The overall massing strategy is derived from a consistent suite of apartment typologies, enabling both efficiency and variation in overall built form expression. The development is based on three standardised apartment typologies: one-bedroom, two-bedroom, and three-bedroom units. Each typology has been designed as a modular component, allowing individual units to be combined in a variety of configurations to form individual apartment buildings.

#### **Car Park Buildings**

The Te Pūtahi Ladies Mile Variation places a strong emphasis on integrating land use and transport systems to reduce reliance on private vehicles. Car parking for the development has been intentionally planned to support a high quality living environment while encouraging a shift towards alternative transport modes to align with the policy intent of the TPLM Zone. Parking infrastructure within the Site will be consolidated largely within two centrally located parking buildings. The parking buildings separate vehicles from the residential apartment blocks with the aim of minimising visual and functional dominance of cars within the residential environment.

The parking buildings will be designed with articulated façades and high-quality external materials to integrate sensitively with the surrounding built form. Extensive street level landscaping, including tree planting, will be implemented around the perimeter of the buildings.

#### **Community Buildings and Ancillary structures**

Community buildings for residents are proposed within the development. These facilities are located strategically amongst the apartment blocks within the Site's movement network, ensuring convenient pedestrian access for residents, and are intended to function as communal hubs within the wider neighbourhood.

Their design will enable a variety of uses, ranging from day-to-day remote working and study spaces, to areas that provide for hobby groups and small social gatherings. Outdoor areas associated with the centres will further support informal interaction and community events.

The facilities are intended to foster social connection, support flexible living and working environment, and enhance overall residential amenity of the development.



**FIGURE 9: DRAWING UD09 VILLAGE GREEN WITH LARGER APARTMENT BUILDINGS**

### 3.6. Open Space

The core design ethos for the development has been shaped by the evolving urban form of the Ladies Mile corridor, balancing residential intensification with amenity and functional open space. Increasing building height enables a larger quantity of green space and the design responds to this balance through a strong emphasis on landscape integration, ensuring that open space is embedded throughout the development and contributes to a distinct and cohesive sense of place.

People of all ages and backgrounds will need space to live, play, relax and connect with their community and surrounding environment. Providing a range of considered active and passive recreation spaces in the landscape that provide a safe and inclusive environment for all residents to enjoy will be key to achieving this (**Figure 10**).

The TPLM Structure Plan proposes an open space area (Local Park) at the corner of the collector road, although the legend asterisk indicates that there is flexibility in the final location. SLL propose to vest a larger local park on the northern side of Road C1 as part of the Project. The park will be approximately 4,000m<sup>2</sup> containing both flat active open space and a bush covered slope as a backdrop. The vested open space will be developed in consultation with QLDC. The remaining open space provision in the development will be retained by SLL in private ownership.



**FIGURE 10: RECREATION AND PLAY SPACES**

Built form is organised around community open space and pavilions. A central green corridor forms an open space spine orientated north-south through the development. The green corridor proposes to maintain the mature maple trees that extend along the existing driveway within the site. Retention of the existing maple trees frames the mountain views and reinforces the Site's established landscape character and identity. The green corridor exhibits a wide shared path set within established planting, leading to a triangular green space, creating a high quality active transport link that is separate from the vehicular traffic.

A legible and interconnected network of footpaths is established throughout the development connecting to the active travel route adjacent to the State Highway 6 and the neighbouring developments to the east and north. An easement in gross in favour council is proposed over the green corridor to connect the State Highway 6 active travel route to the east west collector road. An additional easement in gross is proposed vertically along the eastern boundary of the site, providing another north south connection and the ability to connect into the neighbouring site to the east; and horizontally connecting this pathway to the green corridor.

Distributed throughout the Site, a series of pocket parks and shared open spaces are integrated between apartment buildings (**Figure 11**). These smaller-scale green spaces provide accessible and convenient amenity for residents within close proximity to their homes. Pocket parks are designed to support passive recreation, incorporating seating, communal tables, barbeque facilities and landscaped gathering areas that encourage informal interaction.



**FIGURE 11: GREEN SPACES AND POCKET PARKS LOCATED THROUGHOUT THE DEVELOPMENT**

## 3.7. Infrastructure & Enabling Works

### 3.7.1. Earthworks

The proposed earthworks adopt a cut-and-fill approach that reduces the extent of material import and export as far as practicable. Earthworks will occur across the full development area internal to the Site, covering approximately 9,500m<sup>2</sup>. Indicative volumes show cut material in the order of 37,000m<sup>3</sup> and fill requirements of approximately 47,500m<sup>3</sup>. While some localised retaining structures may be required, the overall landform design seeks to work with existing contours where practicable to reduce the extent of engineered interventions. In addition to on-site works, earthworks will also be required outside the Site to enable the necessary infrastructure upgrades. These external works are expected to occur within adjoining road reserves and areas of reserve land where new or upgraded services and network connections are required to support the development.

Earthworks will be undertaken in accordance with a Construction Environmental Management Plan (CEMP), which will outline the methods, sequencing, and environmental controls to be applied throughout construction. This will include measures for erosion and sediment control, dust suppression, stabilisation of exposed surfaces, and protection of downstream environments. The CEMP will also integrate standard construction management practices, including site access protocols, stockpile management, and monitoring requirements to ensure compliance with consent conditions.

Construction traffic will be managed through a dedicated Traffic Management Plan, which will address vehicle types, haul routes, access points, and any necessary timing restrictions to avoid peak periods. The plan will ensure safe and efficient operation of the surrounding road network while accommodating the movement of earthmoving equipment and construction vehicles. Collectively, these management plans will ensure that earthworks are undertaken in a controlled, coordinated, and environmentally responsible manner.

### 3.7.2. Transport

#### *Internal*

The proposed transport network within the Site has been designed to prioritise walkability, cycling, and public transport use, while still accommodating necessary vehicle access. The overarching intention with the design is to encourage a gradual shift away from private vehicle dependency by creating highly connected, legible, and safe internal movement system that emphasises active transport modes and short, direct travel routes within the Site.

The primary vehicle access is provided via Collector A Road (Road C1), identified on the Structure Plan as traversing Ladies Mile west to east. Road C1 maintains its connection to Lower Shotover Road to the west of the Site and will be delivered as part of Stage 1 of the development to ensure sufficient site access from the outset and will be vested to QLDC. This road establishes the principal vehicle movement corridor and provides the framework from which the internal street network is formed.

The remaining private internal roads are designed as low-speed environments and incorporate street trees, pedestrian footpaths and on street parking, contributing to a high amenity

streetscape and enforcing their function as shared residential environments rather than vehicle dominated corridors (**Figure 12**).

The vehicle network is in addition to a comprehensive system of pedestrian and cycle paths connecting the site. A series of interlinked shared paths and footpaths interlink the apartment buildings through landscaped greenspaces (pocket parks), providing direct and convenient access to residential entrances, parking buildings, community facilities, and connections to external public transport infrastructure. This integrated network ensures that walking and cycling are safe, practical and efficient options for day-to-day movements.



**FIGURE 12: PROPOSED ROADING LAYOUT**

**External**

The zoning framework in the PDP requires that specific transport upgrades be completed before residents can occupy new homes, and many of these works are dependent on NZTA and QLDC funding cycles, procurement processes, and construction timeframes. These dependencies introduce a level of uncertainty that sits largely outside the control of individual developers, and the rigidity of the trigger-based approach does not readily respond to the immediate housing pressures facing Queenstown.

In order to expedite the delivery of housing, SLL is proposing to construct a large proportion of the identified transport upgrades as can reasonably be delivered at this stage, with NZTA and/or other developers responsible for completing the remaining works. By progressing the elements that are within the applicant’s control, the development is able to limit adverse effects on the State Highway network even before the full suite of external upgrades are in place.

The following table identified the relevant transport triggers for the subject Site and the works proposed by the Applicant. SLL own land within sub-area A and B only.

**TABLE 3: TRANSPORT TRIGGERS**

Sub-Area	Transport infrastructural works	Proposed works
<b>A</b>	Access intersection from at least one of Lower Shotover Road / Spence Road or Collector Road A at Stalker Road	SLL proposes to establish the vehicle intersection of Lower Shotover Road and the west east collector road (Road C1)
<b>A, K2</b>	Upgraded Lower Shotover Road at Spence Road intersection	SLL propose to upgrade this intersection
<b>A, B, K2</b>	Bus stops on State Highway 6, Stalker Road intersection (one on each side of State Highway 6) Signalisation of Stalker Road / State Highway 6 intersection, including at-grade pedestrian and cycle crossings across both roads. Active Travel link to State Highway 6 bus stops at Stalker Road Intersection.	SLL propose to upgrade the Stalker Road / State Highway 6 roundabout to a signalised intersection
<b>A, B, C, E, K2</b>	Dedicated westbound bus lane on State Highway 6 from Howards Drive to Shotover Bridge (part of Queenstown Package)  State Highway 6 eastbound bus lane from State Highway 6A to Hawthorne Drive and State Highway 6 westbound bus lane from Hardware Lane to State Highway 6A (part of Queenstown Package)  Stalker Road northbound bus priority lane south of State Highway 6	SLL propose to establish a bus lane from the Stalker Road / State Highway 6 intersection west to the Shotover Bridge

### 3.7.3. Servicing

Reticulated services capable of servicing the proposed development are not yet available. The Project proposes to upgrade existing reticulated services to provide for the demand capacity of the proposed development as well as increase capacity to support increased urban growth in the area.

The proposed wastewater, stormwater and water supply services are set out in the Infrastructure Memorandum (**Appendix 6**). In summary, the Project proposes the following:

#### *Internal*

#### **Stormwater**

The stormwater management strategy for the development has been developed in the context of the wider Ladies Mile Structure Plan and adopts an integrated catchment-based approach. The development has been designed to provide approximately 40% permeable landscaped

area, compared to the 25% required by the Queenstown Lakes District Plan, supporting groundwater recharge and reducing the impact of increased impervious surfaces.

Stormwater within the development will be collected via a piped network and directed to water quality treatment and soakage devices, which will provide storage, and quality treatment to a QLDC Land Development and Subdivision Code of Practice standard. The proposed devices utilise in-ground tanks capable of providing detention, retention, and soakage discharge to ground for storm events up to the 1% AEP events.

### **Wastewater**

A reticulation network is proposed within the Site to provide wastewater connections for all dwellings and commercial areas. This pipe will be a mixture of private and public pipes within the Site. All pipes will be constructed by SLL, with the public pipes to be vested in QLDC. The network will discharge to the trunk wastewater infrastructure within SH6.

### **Water Supply**

All units within the development will be provided with individual, reticulated water supply connections. These connections will form part of a private internal water network serving the development, with on-site reticulation designed to ensure adequate pressure, flow, and operational performance across all buildings. The internal system will connect to QLDC's external reticulated water-supply infrastructure, with ownership and maintenance of the internal network remaining private.

### **Power and communications**

Power and telecommunications will be provided via underground reticulation systems, consistent with modern urban development practices. The design and installation of these services will be undertaken by SLL, in coordination with the relevant utility providers and integrated with the overall infrastructure layout.

The proposed approach ensures that all dwellings will have access to reliable power and high-quality telecommunications services, including provision for fibre connectivity.

Discussions with Aurora and Chorus in March 2026 confirm that the Project's power and communication needs can be met through their networks.

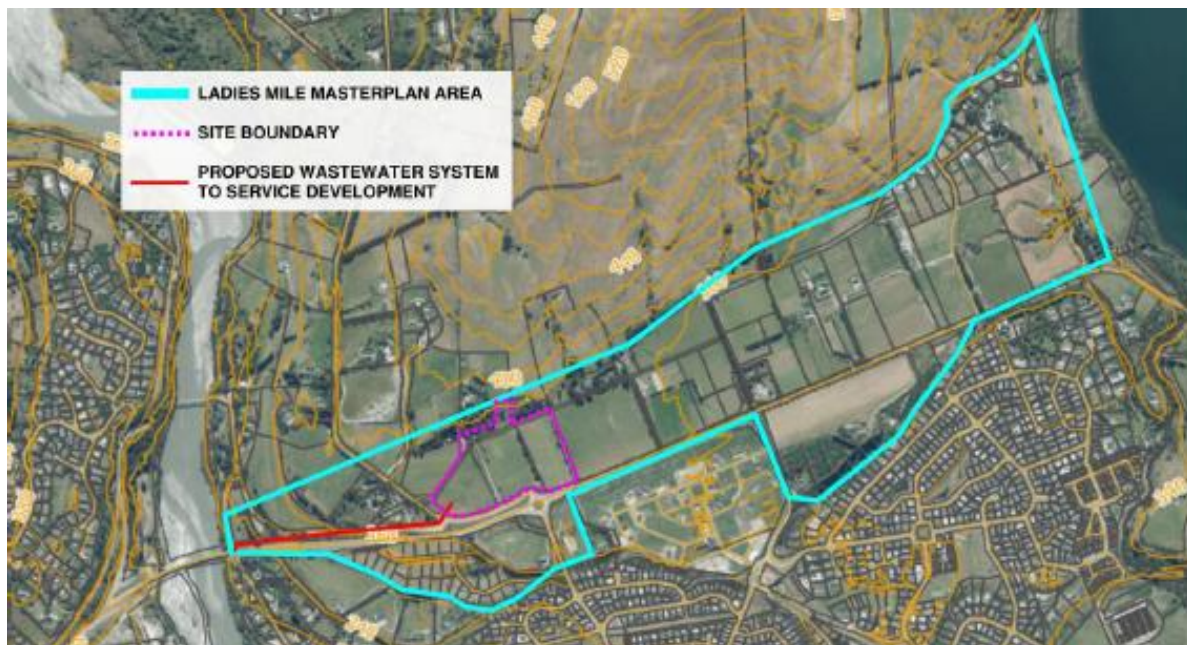
### ***External***

Stormwater flows associated with extreme events greater than the 1% AEP event, up to the 0.4% AEP event are managed via defined overland flow paths that follow natural drainage patterns toward downstream receiving environments. Runoff generated from storms greater than the 1% AEP event, up to the 0.4% AEP storm event will discharge toward Shotover River via defined overland flow paths.



**FIGURE 13: PROPOSED EXTERNAL WORKS: STORMWATER DISCHARGE FROM STORM EVENTS GREATER THAN THE 1% AEP EVENT**

In relation to wastewater, the development will require staged external wastewater upgrades, with the final scope and timing to be confirmed through ongoing discussions with QLDC. Initial flows are expected to utilise available capacity within the existing 375 mm wastewater main on the south side of SH6, before transitioning to a new trunk main from the Lower Shotover Road / SH6 intersection to the Shotover Bridge. Consent is sought for these upgrades, which are anticipated to be delivered by SLL, noting that the exact delivery responsibilities will be confirmed as the Project progresses. These works are intended to ultimately provide for full Ladies Miles development flows to the wastewater treatment plant.



**FIGURE 14: PROPOSED EXTERNAL WORKS: WASTEWATER TRUNK ALIGNMENT**

In relation to water supply, this can be achieved through various options, including an extension of an existing main along with internal pipework, through a phased delivery.

Water can be supplied to the site by connecting to the existing DN450 rising main near the Lower Shotover Bridge, with a new DN560 rising main in the road reserve conveying flows to the site. Several storage options are being considered, including use of the already-consented reservoirs on neighbouring land (RM230721 as varied by RM240476). This staged approach enables development to proceed ahead of full network build-out while aligning infrastructure delivery with demand.

The ultimate configuration includes a dedicated rising main directly linking the Shotover Country bore field and Water Treatment Plant to the consented Reservoir, removing reliance on the interim connection and improving overall network capacity and resilience.

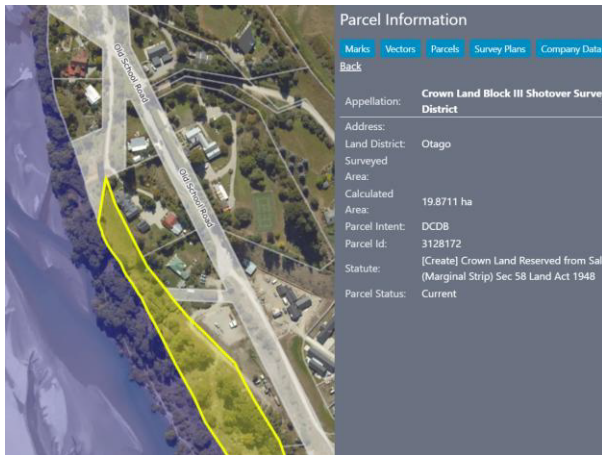
Based on the expert memorandum provided, there are no known strategic supply constraints to delivering the ultimate water supply solution, with QLDC recently constructing an additional five bores for the sole purpose of the Ladies Mile water scheme.

Existing Council-vested water supply infrastructure is located along Old School Road. A new QLDC-owned water pipe is proposed to run parallel to the existing pipeline; however, its current alignment is proposed to traverse Crown land, as shown in Error! Reference source not found. below.

If these works are deemed necessary through further consultation with QLDC, a concession will be sought through the substantive application, under this legislation to authorise the construction/installation of the new water pipe, and to subsequently protect by easement. Detailed design and supportive information regarding management of environmental effects will be supplied to DoC.



**FIGURE 15: YELLOW LINE REPRESENTS PROPOSED ALIGNMENT OF NEW WATER PIPE THROUGH CROWN PARCEL. BLUE LINES REPRESENT EXISTING WATER INFRASTRUCTURE.**



**FIGURE 16: SUBJECT CROWN PARCEL (YELLOW)**  
SOURCE: GRIP



**FIGURE 17: PROXIMITY OF SUBJECT CROWN PARCEL TO PROPOSED DEVELOPMENT**  
SOURCE: GRIP

### 3.8. Subdivision

The subdivision will occur in two parts.

First, a fee simple subdivision will create the development lots (residential and commercial) and vest the road network and public open space with Council, as identified in the Subdivision Scheme Plans enclosed as **Appendix 8**.

Following construction of the apartment buildings, a unit title subdivision will then be undertaken to establish the individual units and associated common property. This will create body corporates responsible for the ongoing management and maintenance of the buildings and shared areas. Under the SLL build-to-rent model, these body corporates provide a structured and transparent framework for long-term asset stewardship, ensuring consistent maintenance standards, professional management, and protection of shared facilities. This approach supports the delivery of high-quality rental housing and provides residents with a well-maintained, cohesive living environment over the long term.

## **4. APPROVALS SOUGHT (s13(2)(d) and s13(4)(t))**

### **4.1. Resource Management Act 1991**

Pursuant to Schedule 5 of the FTAA, this application seeks all approvals required under the Resource Management Act 1991 (RMA) for the subdivision and use of land, together with associated enabling works, activities, and infrastructure (both internal and external to the Site).

It is noted that the development does not include any ineligible or prohibited activities under the RMA (s13(4)(i)).

The following resource consents are anticipated to be required under the planning instruments listed below. It is acknowledged that detailed design of the Project and associated infrastructure is ongoing. Accordingly, this list represents a preliminary outline of the likely consents, which will be confirmed and finalised within the Substantive Application with reference to the relevant planning framework.

#### **Section 9(2) – Use of land that contravenes rules in the Otago Regional Plan – Water for Otago (2004):**

- Bulk earthworks associated with residential development with potential for material to enter water.

#### **Section 9(3) – Use of land that contravenes rules and standards in the Queenstown Lakes District Council Proposed District Plan:**

- Urban land use activities, including construction of buildings, that do not fully align with the Structure Plan, including residential and commercial development.
- Earthworks exceeding permitted thresholds.
- Development occurring prior to transport infrastructure shown on the Structure Plan being completed.
- Utilities, 3waters and transport infrastructure installation internal and external to the site.

#### **Section 11 – Subdivision of land under the Queenstown Lakes District Council Proposed District Plan:**

- Subdivision (fee simple and unit title) for urban development (residential, commercial, and infrastructure including open space and roads) that departs from the approved Structure Plan.
- Vesting of infrastructure, roads and park.

#### **Section 15(1) – Discharge of contaminants or water into water under the Otago Regional Plan – Water for Otago (2004):**

- Earthworks discharges associated with subdivision and site development.

- Stormwater discharge to the Shotover River associated with extreme events greater than the 1% AEP event.

### **Section 15(1) – Discharge of contaminants to air under the Otago Regional Plan – Air for Otago (2008):**

- Construction activities, including earthworks and building operations

#### **4.2. Conservation Act 1987 and Reserves Act 1977**

As detailed in Section 3, infrastructure external to the Site may traverse conservation areas and/or reserve land. While details are not yet final, SLL is seeking scope to apply for these approvals, pursuant to Schedule 6 of the FTAA.

Coordinated planning and detailed design for the water supply, wastewater, stormwater, and utility networks are currently underway.

If these works are deemed necessary through further consultation with QLDC, a concession will be sought through the substantive application, under this legislation to authorise the construction/installation of the new water pipe, and to subsequently protect by easement. Detailed design and supportive information regarding management of environmental effects will be supplied to DoC.

#### **4.3. Heritage New Zealand Pouhere Taonga Act 2014**

The Heritage New Zealand Pouhere Taonga Act 2014 seeks to identify, protect, and preserve and conserve New Zealand's cultural and historic heritage, ensuring the preservation of heritage values for present and future generations. The Project does not involve any known archaeological sites or heritage features, and therefore no approvals are required under the FTAA. The risk of accidental discovery is considered unlikely, however, industry standard conditions can be included on the Substantive Application to cover such an occurrence.

#### **4.4. Wildlife Act 1953**

A precautionary allowance has been made for the potential need for approval under section 53 of the Wildlife Act 1953, should the installation of the water pipeline across DOC-administered land interact with indigenous lizards, vegetation and birds. At this stage, no ecological survey has been undertaken and the likelihood of lizard presence within the narrow construction corridor is considered low given the modified nature of the alignment; however, DOC has advised that Wildlife Act authorisation may be required if any handling, disturbance, or incidental harm to protected fauna cannot be ruled out. The requirement for approval will be confirmed as part of the Substantive Application. If needed, a fauna and flora management approach such as pre-construction checks and appropriate handling protocols, will be developed to ensure compliance with the Act and to minimise any potential effects on indigenous wildlife.

#### **4.5. Public Works Act 1981 (s13(4)(m))**

No processes have been undertaken under the Public Works Act 1981 in relation to the Project. The Project does not require land acquisition, designation, or other actions under the Public Works Act 1981, and no Public Works Act approvals are sought or anticipated.

#### 4.6. Compliance and Enforcement Matters (s13(4)(x))

SIL has received an infringement notice issued following a Council site visit on 23 February 2026 for one of its Auckland sites, in relation to construction activity, specifically concrete pouring, which had commenced at 4.30 am at 130 Ascot Avenue without approval. This breached Condition 44 of Resource Consent LUC60430930 and section 9(3) of the RMA.

This was an isolated incident, and there has been no repeat non-compliance since. SLL now have a clear understanding of the required protocols and approval processes, and the team has reinforced these internally to ensure all future works remain fully compliant. The matter is resolved with no further issues of this nature arising.

#### 4.7. Specific Proposed Approvals (s13(4)(y))

With respect to the identified matters relating to specific Project approvals as detailed in Section 13(4)(y), we note:

- No activities are classed as prohibited use; involve a designation or alteration to an existing designation, with the relevant information specified in Clause 2 of Schedule 5 provided within this report (s42(4)(a) and 4(d)).
- No changes to or cancellation of existing resource consent conditions are necessary (s42(4)(b) and (6)).
- No certificate of compliance is necessitated by this development (s42(4)(c) and (7)).
- Concessions may be sought under the Conservation Act 1987 and Reserves Act 1977 with the relevant information specified in Clause 2 of Schedule 6 provided within this report. We don't understand any concession required for the Project triggers a right of first refusal. However, even if this was a possibility, SLL will not be seeking a concession which would trigger of right of first refusal or a right of offer or return. Concessions including any lease, license, permit or easement of a reserve other than a Crown-administered reserve are necessary for the proposed development (s42(4)(e) and clause 1 of Schedule 6).
- No land exchange is necessitated by this development (s42(4)(f) and (8)).
- No complex freshwater fisheries activity approval is necessary under Regulations 42 or 43 of the Freshwater Fisheries Regulations 1983 (s42(4)(j)).
- No marine consent is necessitated by this development under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (s42(4)(k) and as such s22(5) and s22(6) do not apply).
- The project is not an aquaculture activity and as such s22(7) does not apply.
- No access arrangements (including changes to an existing arrangement) are required for this development under s61B of the Crown Minerals Act 1991 (s42(4)(m)).
- Mining permits are not relevant to this development under s23A of the Crown Minerals Act 1991 (s42(4)(n)).

## 5. APPROPRIATENESS FOR FAST-TRACK APPROVALS PROCESS

### 5.1. Explanation of how the project meets the criteria in Section 22 (Section 13(4)(b))

#### 5.1.1. Significant Regional or National Benefits of Infrastructure or Development Project (s22(1)(a))

*The criteria for accepting a referral application are that—*

*(a) the project is an infrastructure or development project that would have significant regional or national benefits; and*

The Project will deliver significant benefits for the region and therefore qualifies as a development project under the FTAA. The nature and scale of its benefits are detailed throughout this Report and at length within the Economic Assessment enclosed as **Appendix 9**, and by way of summary, include:

- **Major regional economic benefits**, including substantial construction employment and long-term support for the district's workforce through the provision of high-quality, secure rental housing. The economic benefits of residential projects (both during construction and operation) have been recognised through a number of fast-track applications under the Covid-19 Recovery (Fast-track Consenting) Act 2020 and the Fast-track Approvals Act 2020. Construction is a major driver for economic growth within New Zealand. Total development cost is approximately \$570 million (\$61.5 million land, \$431 million construction, \$39 million statutory and development contributions, and contingency). The project has a four-year construction timeline (2026-2030) with an estimated total local spend of \$472 million flowing through the construction sector. The direct economic benefits of the construction activity will be largely felt within the district, with some spillover towards Central Otago and further south.

Employment effects are similarly significant. The Project supports 3,036 FTEs nationally, with 2,277 FTEs (75%) located in Queenstown region. Peak employment occurs in 2029 at 860 FTEs nationally, including 647 FTEs within the district. On average, the Project supports 563 FTEs per year during the main construction years, representing over 2% of all jobs in the district. Post-construction, the Project will support 40–50 permanent FTEs in property management and maintenance.

- **Significant residential development outcomes**, enabling the creation of a substantial new urban neighbourhood that will materially contribute to meeting projected housing demand across Queenstown Lakes. The scale and delivery model of the Project directly supports regional housing supply, diversity, and affordability objectives. The Project will have significant regional benefits for Queenstown and will significantly increase housing supply and housing choice in the area. The Project will deliver approximately 1,100 permanent rental homes, equivalent to 4.7 years of rental supply based on the district's historic growth of 228 new rentals per year. The economics assessment identifies this as likely the largest single addition to the district's rental stock.
- **In addition, SLL is proposing to fund and deliver substantial upgrades** to QLDC's wider three-waters network, providing infrastructure capacity that will act as a catalyst for the broader development of the newly rezoned Te Pūtahi Ladies Mile Plan area. These

upgrades represent a significant public benefit, enabling growth well beyond the boundaries of the Site itself.

Collectively, these outcomes represent significant regional benefits, contributing to the housing, economic, and environmental wellbeing of the district and region. The Project therefore clearly meets the criteria of Section 22(1)(a) of the FTAA for acceptance as a referral application.

### **5.1.2. Referring the project to the fast-track approvals process (s22(1)(b))**

*The criteria for accepting a referral application are that—*

*(b) referring the project to the fast-track approvals process—*

- (i) would facilitate the project, including by enabling it to be processed in a more timely and cost effective way than under normal processes; and*
- (ii) is unlikely to materially affect the efficient operation of the fast-track approvals process.*

The fast-track process offers a number of advantages over the standard RMA process, particularly in relation to time and cost-effectiveness.

SLL is seeking to use the fast-track process to provide certainty of timing and delivery for its Project that is fully designed, infrastructure-aligned, and genuinely shovel-ready, to enable construction to commence at pace as soon as approvals are secured.

One of the factors influencing SLL's decision to progress this Project through the FTAA, rather than via the standard RMA consenting pathway, is the scale and complexity of the application. Given its size, it is likely to place significant pressure on QLDC's processing capacity and could therefore face extended timeframes. The Fast-track process provides a more efficient and predictable pathway, while still ensuring that the Project is thoroughly assessed against the relevant environmental and planning considerations. In particular:

- Notification is precluded under the Fast-track Approvals Act 2024. The panel is only permitted to invite comments from specified persons and there is a short timeframe for comments to be provided. This streamlined process for receiving comments is appropriate to address any concerns arising from the Project. SLL is confident that the impacts of the Project can be avoided, remedied or mitigated through its Project given the amount of detailed work completed to date.
- The consenting timeframe under the FTAA is likely to be in the order of 6 months. This is a significant time saving, compared to a standard RMA process which could take between 2-3 years given the complexity of the Project and appeal risk. The time saving will allow the benefits of the Project to be realised in advance of any standard RMA process.

The expedited framework is well-suited to the Project, as it effectively facilitates the advancement of approvals, enabling timely delivery.

The Site is also subject to the TPLM zoning framework, which includes a prescriptive Structure Plan intended to guide the form and layout of future urban development across the wider Ladies Mile area. SLL have identified that whilst the TPLM Structure Plan delivers one possible urban outcome, it is not necessarily the only or optimal urban outcome when tested against the Site's opportunities, and SLL's build-to-rent model. As a result, the proposed development includes a number of departures from the Structure Plan, including the relocation of the Local Shopping

Centre, removal of the north–south collector road, repositioning of the vested park, non-provision of the indicative swale, and building heights that exceed those shown on the Structure Plan. These changes result in a more refined and integrated response to the site, and wider zone environment and have been informed by further technical assessment and engagement with Council.

While each of the proposed refinements to the TPLM Structure Plan is relatively minor in its own right, taken together they fall outside the strict parameters of the structure plan and would therefore trigger a non-complying consent pathway. This would introduce unnecessary complexity and delay, despite the fact that the changes are driven by a desire to better achieve the purpose of the Zone and give effect to its objectives and policies, particularly those relating to housing supply, density, and high-quality urban form. In practice, elements of the Structure Plan, most notably the height limits, have proven to be a barrier to delivering the level of housing envisaged for Te Pūtahi Ladies Mile. As consultation continues and detailed design progresses, the Project will continue to be refined in collaboration with Council, but it is clear that pursuing these outcomes through a conventional resource consent or rezoning process would be inefficient and uncertain given the recent operative status of the TPLM provisions. Advancing a referral under the FTAA therefore provides a more appropriate and efficient mechanism to implement the intended urban development outcomes for the area.

The Project involves the subdivision and development of land for predominantly residential purposes, and the land development works required are typical of those anticipated within the TPLM Zone. Accordingly, it is anticipated that processing by an expert panel and administering agencies will be comparatively straightforward and efficient, and would not materially affect the efficient operation of the fast track approvals process. In this context, referral under the FTAA is considered to provide a timely, cost-effective, and administratively efficient pathway to facilitate delivery of this regionally significant residential development, consistent with the intent of Section 22(1)(b).

**5.1.3. Matters that may be considered by the Minister (s22(1A) and s22(2))**

*For the purposes of subsection (1)(a), the Minister must consider a relevant Government policy statement.*

According to the Fast-track website, at the time this application was lodged there are no relevant Government policy statements that apply to the Project.

*(a) whether the project  
(i) has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:*

The **QLDC Housing Business Capacity Assessment 2025**<sup>3</sup> acknowledges the Te Pūtahi Ladies Mile Eastern Corridor as containing a significant portion of the district growth.

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<sup>3</sup> Market Economics Ltd, *Queenstown Lakes District Housing and Business Development Capacity Assessment 2025* (Queenstown Lakes District Council and Otago Regional Council, 23 September 2025)

This aligns with the **Queenstown Lakes Spatial Plan**<sup>4</sup>, adopted in full by QLDC on 29 July 2021. The Spatial Plan establishes the long-term vision and framework for how and where growth in the district is anticipated to occur through to 2050.

A core principle of the Spatial Plan is a consolidated approach to urban development, directing growth to existing urban areas and identified future urban locations, while avoiding ad hoc expansion into rural areas or landscapes with high environmental or cultural values. This approach includes enabling greater building heights and densities in appropriate, well-located areas, particularly where development can support efficient infrastructure use and integration with public transport. This direction is consistent with the NPS-UD, which directs councils to enable increased height and density in locations with good access to public transport or where there is relative demand for housing.

The Spatial Plan identifies Te Pūtahi Ladies Mile as one of six priority development areas and describes it as a new transit-oriented neighbourhood intended to deliver new housing choices alongside a small local mixed-use centre located on the future frequent public transport network. The Plan recognises that development in this location is reliant on coordinated land use planning and infrastructure provision, and the Project has been prepared with Council input as part of an integrated approach to development and infrastructure upgrades along Ladies Mile.

The proposed application at Te Pūtahi Ladies Mile is considered to align with this spatial strategy. It is located within an area expressly identified for future urban development and includes increased building heights and densities, which enable more efficient building footprints, allowing for improved onsite open space provision, pedestrian accessibility, and community facilities at ground level.

*(ii) will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:*

The infrastructure proposed to service the Project is considered to meet the definition of *Regionally Significant Infrastructure* under the QLDC Proposed District Plan. Although some of the works relate to development-specific water supply, wastewater, and stormwater systems, there will also be trunk infrastructure assets which are intended to be vested in Council and will form part of the district's Municipal Infrastructure. Under the Plan, Municipal Infrastructure operated by Council is expressly included within the definition of Regionally Significant Infrastructure. As the servicing assets will ultimately be owned and operated by Council and will integrate into the wider municipal network, they fall within this classification.

*(iii) will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):*

The QLDC District Plan identifies its urban areas through the use of an Urban Growth Boundary. The district plan utilises these to ensure that urban development occurs in a compact, well-designed, and integrated urban form. As part of the plan variation that up-zoned this Site, the boundary was extended to include Ladies Mile, confirming it as part of the district's established

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<sup>4</sup> Queenstown Lakes District Council, *The Spatial Plan* (July 2021) [https://www.qldc.govt.nz/media/hsdjlrv3/the-spatial-plan\\_a4-booklet\\_jul21-final-web-for-desktop.pdf](https://www.qldc.govt.nz/media/hsdjlrv3/the-spatial-plan_a4-booklet_jul21-final-web-for-desktop.pdf)

urban environment. This shift reflects the area's anticipated role in supporting a well-functioning, integrated urban environment.

The proposed build-to-rent development will make a substantial contribution to housing supply within the Queenstown Lakes District, directly responding to the acute need for secure, long-term rental accommodation. Unlike traditional develop-and-sell models, the build-to-rent approach ensures that all homes remain in the rental market permanently, providing stable, affordable options for workers and residents who are often displaced by short-term visitor accommodation such as Airbnb. This model delivers genuine additionality to the district's housing stock and supports a more resilient, reliable rental market for the wider region.

The Economic Memorandum details that providing 1,064 permanent rental homes, is the equivalent to 4.7 years of rental supply based on the district's growth of 228 new rentals per year. The memo identifies this as likely the largest single addition to the district's rental stock.

The development directly targets one- and two-bedroom dwellings, the typology in shortest supply, consistent with QLDC's Housing and Business Development Capacity Assessment. All units remain in the long-term rental pool, providing permanent tenure security and avoiding conversion to holiday homes or short-term rentals.

These outcomes indicate that the Project will play a meaningful role in addressing the region's housing supply, demand, and affordability challenges. In particular:

- The introduction of a large number of new, purpose-built rental homes will help stabilise the rental market by increasing supply and easing pressure on rents, supporting a more balanced and resilient housing system.
- The variety of bedroom configurations within the development will broaden the range of rental options available, enabling greater choice and fostering a diverse, well-integrated community.

The Project represents a well-planned and integrated extension of the urban environment, enabled by the TPLM zoning and supported by coordinated infrastructure investment. By delivering a new housing model at scale and at pace, the development will contribute meaningfully to improved affordability and greater choice, helping to create a well-functioning urban environment consistent with the direction of the National Policy Statement on Urban Development (NPS-UD).

The transport network has been designed to accommodate future public transport connections, ensuring strong accessibility and supporting a shift toward more sustainable travel as the community grows.

Taken together, these elements demonstrate a clear alignment with national direction under the NPS-UD, and highlights the significant social, economic, and housing benefits the project will deliver for the wider region.

The Economic Assessment confirms that the proposed development will generate a wide range of significant economic and social benefits for the region. The project directly responds to the substantial housing pressures identified through the Te Pūtahī Ladies Mile Plan Variation process, providing a reliable and long-term supply of purpose-built rental homes to support the district's rapidly growing population and workforce.

Beyond these direct housing benefits, the Project will also deliver broader outcomes that strengthen the long-term functioning, resilience, and growth of the Ladies Mile urban area, including:

- **A substantial increase in housing supply and capacity**, achieved through a range of unit types and the delivery of high-quality build-to-rent homes at scale. This supports improved affordability and provides the certainty of long-term rental accommodation that the Te Pūtahi Ladies Mile Plan Variation process identified as critical for the district.
- **Enhanced economic activity and local employment**, both during construction and through the ongoing operation of a large, professionally managed residential community, generating flow-on benefits across multiple sectors.
- **Coordinated and efficient use of infrastructure**, with the project delivering significant upgrades to QLDC's wider three-waters network. These upgrades will unlock capacity not only for this development but for the broader Te Pūtahi Ladies Mile Plan area, maximising the value of existing and planned public investment.
- **Improved local amenity and convenience**, supported by the establishment of a well-located Local Shopping Centre that will serve the day-to-day needs of residents and reduce reliance on travel across the Shotover Bridge.

Collectively, these outcomes demonstrate the Project's strong alignment with the strategic intent of the TPLM rezoning and its potential to materially enhance regional wellbeing, economic resilience, and the delivery of a well-functioning urban environment.

*(iv) will deliver significant economic benefits:*

The significant economic benefits are detailed within the Economic Assessment enclosed as **Appendix 9**, and by way of summary, include:

The Project will deliver significant economic benefits, driven by substantial construction activity and long-term support for the district's workforce through the provision of high-quality, secure rental housing. Construction remains one of New Zealand's most important drivers of economic growth.

The total development cost is approximately \$570 million, comprising \$61.5 million for land, \$431 million in construction, \$39 million in statutory and development contributions, and contingency. Over the four-year construction period (2026–2030), an estimated \$472 million in local spend will flow through the construction sector. The direct economic benefits of this activity will be concentrated within the Queenstown-Lakes District, with additional spillover into Central Otago and Southland.

Employment effects are similarly significant. The Project will support 3,036 FTEs nationally, including 2,277 FTEs (75%) within the Queenstown region. Peak employment occurs in 2029, with 860 FTEs nationally, of which 647 FTEs are within the district. During the main construction years, the Project supports an average of 563 FTEs per year, representing over 2% of all jobs in the district. Following completion, the development will sustain 40–50 permanent FTEs in property management and maintenance, providing ongoing employment and stability for the local workforce.

*(v) will support primary industries, including aquaculture:*

Not applicable.

*(vi) will support development of natural resources, including minerals and petroleum:*

Not applicable.

*(vii) will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:*

The Te Pūtahi Ladies Mile Plan Variation established a development framework that intentionally supports climate change mitigation and reduced greenhouse gas emissions through compact urban form, integrated transport planning, and access to local services. The proposed development builds on and strengthens these outcomes by incorporating the following features:

- **A well-located Local Shopping Centre that supports a low-emission, self-sufficient community**, reducing the need for residents to travel across the Shotover Bridge for daily needs and supporting shorter, low-emission trip patterns within the Ladies Mile community.
- **Population to support the TPLM larger commercial centre** intended to serve the broader Ladies Mile population. Its long-term success is dependent on achieving sufficient residential density within walking and cycling distance. By delivering a substantial number of homes early, the proposed development will help establish the critical population base needed to support both the proposed Local Shopping Centre and the wider TPLM commercial hub. This will significantly reduce the need for residents to travel across the Shotover Bridge for day-to-day needs, lowering vehicle kilometres travelled and associated emissions. The same principle applies to the future school site identified in the TPLM Provisions: a strong local population will enable a viable roll, ensuring that children can walk or cycle to school rather than commuting longer distances. Together, these outcomes reinforce a compact, low-carbon urban form and support climate change mitigation across the Ladies Mile area.
- **A connected and permeable street network**, designed to integrate with future east-west and SH6 transport corridors, enabling efficient movement for walking, cycling, and public transport.
- **Direct access to high-quality active transport routes**, including connections to the wider walking and cycling network that links Ladies Mile with Frankton, Lake Hayes, and surrounding neighbourhoods, reducing reliance on private vehicles for local and commuter trips.
- **Roading designed to accommodate future public transport services**, ensuring the community can transition to low-emission travel modes as bus services expand across the TPLM area.
- **A compact, higher-density residential form**, which supports energy-efficient buildings, reduces per-capita infrastructure emissions, and aligns with national direction to concentrate growth in well-serviced urban areas.

In addition, the Project significant contribution to long-term rental housing supply will help establish a more self-sufficient and resilient community within the TPLM Zone, reducing the need for workers to commute from more distant settlements. Collectively, these elements promote a low-carbon urban environment and strongly align with national, regional, and district-level climate change mitigation objectives.

*(viii) will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards:*

The Site is free from significant natural hazard constraints; however, the Project incorporates several indirect but meaningful features that collectively support climate change adaptation and long-term resilience. The compact, walkable urban layout, supported by a well-located Local Shopping Centre and proximity to the wider TPLM commercial area, enables residents to meet daily needs locally and reduces reliance on infrastructure and networks that may be more vulnerable during extreme events. By concentrating growth in a well-serviced, strategically planned location and reinforcing a self-sufficient community structure, the development promotes a settlement pattern that is better equipped to respond to, and recover from, the long-term effects of climate change and natural hazard events.

*(ix) will address significant environmental issues:*

The Project does not directly address any significant environmental issues on the Site, as the land is already zoned for urban development under the TPLM framework and is not subject to major ecological or natural hazard constraints. However, the Project will deliver several indirect environmental benefits through the coordinated and efficient use of land and infrastructure. By concentrating development within an area specifically identified and planned for urban growth, the Project avoids dispersal into more sensitive environments and supports the efficient utilisation of existing and upgraded three-waters infrastructure. The establishment of a compact, well-connected neighbourhood, supported by local services, active transport links, and integrated open space, will enhance the overall environmental performance of the Te Pūtahi Ladies Mile Plan area and contribute to a more resilient and sustainable urban environment.

*(ixa) will promote competition in the grocery industry:*

Not applicable.

*(x) is consistent with local or regional planning documents, including spatial strategies:*

An assessment against the relevant local and regional planning documents, and spatial strategies is provided below:

### **Regional Policy Statement for the Otago Region 2019 (RPS) and Proposed Regional Policy Statement for the Otago Region 2021 (PRPS)**

Both the RPS and PRPS seek to ensure that Otago's natural and built resources are managed in a way that supports the region's social, economic, cultural, and environmental wellbeing, while enabling resilient, well-functioning urban areas. At a high level, the Project is consistent with the direction of both documents.

In particular, the urban growth and development provisions (Objective 4.5 and Policies 4.5.1 – 4.5.5) of the RPS, and the PRPS provisions relating to well-functioning urban environments, strategic planning, and infrastructure integration, promote consolidated, coordinated growth in

locations supported by existing or planned infrastructure. The Project aligns with this direction by enabling planned, higher-density residential development within an area already identified for urbanisation under the TPLM framework, supported by coordinated transport and three-waters infrastructure and a layout that reflects good urban design outcomes.

Objective EIT-INF-O5, Policy EIT-INF-P17, and Method EIT-INF-M5 provide for the coordinated development of infrastructure to support growth. The Project includes the upgrade and timely delivery of new infrastructure, ensuring capacity is available to meet planned and existing demand.

Objectives UFD-O1, O2, and O5, together with Policies UFD-P2–P4 and Method UFD-M2, guide the form and functioning of urban areas. The provisions direct that urban development should expand housing choice, quality, and affordability while strengthening connectivity and integrating growth with existing land uses and planned infrastructure. Strategic planning must ensure sufficient development capacity by identifying appropriate areas for intensification and expansion, with higher-density development contributing to well-functioning, infrastructure-supported neighbourhoods accessible by active and public transport. Development should also respond to climate change by fostering resilient, energy-efficient, and adaptable urban environments that can accommodate future conditions.

The proposed development gives effect to these principles by delivering planned, coordinated growth within an area already identified and zoned for urbanisation through the Te Pūtahi Ladies Mile Plan Variation process. The suitability of the Site for higher-density residential development has been comprehensively tested through that process, ensuring that growth occurs in a strategic location with regard to landscape values, transport capacity, infrastructure servicing, and community needs. The Project will establish a well-designed, compact neighbourhood that provides secure rental properties, strong connectivity, and integrated local services, supporting a safe, healthy, and cohesive community. Its layout enables efficient staging and aligns with planned infrastructure upgrades, ensuring capacity is available ahead of development. In doing so, the project contributes to a well-functioning urban environment that supports housing choice, accessibility, and long-term resilience within the TPLM Zone.

### **QLDC Proposed District Plan**

The Te Pūtahi Ladies Mile Plan Change was expressly introduced to enable substantial residential growth in response to Queenstown's acute housing pressures. It establishes a deliberate shift in land use within the Zone, particularly on the northern side of State Highway 6, where the transition from a pastoral landscape to a dense, urban residential environment is both anticipated and required to achieve the minimum density outcomes for the area.

Chapter 49.1 (Zone Purpose) sets a clear expectation for compact, higher-density development, generally at medium to high density, to ensure efficient use of land and infrastructure. It emphasises the creation of well-designed, connected neighbourhoods supported by an integrated network of open spaces, transport corridors, and community facilities.

The Te Pūtahi Ladies Mile Structure Plan provides the strategic framework to deliver these outcomes. It not only enables development but actively encourages high-quality, high-density, and integrated urban form. Development within this Zone is a core component of the District's growth strategy, contributing essential new housing, supporting community wellbeing, and shaping a resilient, sustainable urban environment.

The Project aligns with and gives effect to these purposes by delivering the intended pattern of urban intensification, integrating with the Structure Plan framework, and contributing meaningfully to the district's housing supply and urban development objectives.

### **QLDC Spatial Plan (2021)**

The Queenstown Lakes Spatial Plan, adopted in full by QLDC on 29 July 2021, establishes the long-term vision and framework for how and where growth in the district is anticipated to occur through to 2050. The Spatial Plan provides strategic direction for land use, infrastructure planning, and transport integration, and identifies locations where future urban development is anticipated and supported. It was prepared to be consistent with the direction of the NPS-UD to provide sufficient development capacity and enable well-functioning urban environments.

A core principle of the Spatial Plan is a consolidated approach to urban development, directing growth to existing urban areas and identified future urban locations, while avoiding ad hoc expansion into rural areas or landscapes with high environmental or cultural values. This approach includes enabling greater building heights and densities in appropriate, well-located areas, particularly where development can support efficient infrastructure use and integration with public transport. This direction is consistent with the NPS-UD, which directs councils to enable increased height and density in locations with good access to public transport or where there is relative demand for housing.

The Spatial Plan identifies Te Pūtahi Ladies Mile as one of six priority development areas and describes it as a new transit-oriented neighbourhood intended to deliver new housing choices alongside a small local mixed-use centre located on the future frequent public transport network. The Plan recognises that development in this location is reliant on coordinated land use planning and infrastructure provision, and the Project has been prepared with Council input as part of an integrated approach to development and infrastructure upgrades along Te Pūtahi Ladies Mile.

The proposed application Te Pūtahi Ladies Mile is considered to align with the strategic direction of the Spatial Plan. It is located within an area expressly identified for future urban development and includes increased building heights and densities, which enable more efficient building footprints, allowing for improved onsite open space provision, pedestrian accessibility, and community facilities at ground level.

Overall, the Project is consistent with the Spatial Plan's outcomes of concentrating development in planned locations, enabling increases in height and density, supporting integrated land use and transport outcomes, and delivering well designed, high amenity residential development within a designated priority development area.

### **Queenstown Lakes Homes Strategy (2021)**

The Queenstown Lakes District Homes Strategy was adopted by QLDC on 16 December 2021 and establishes QLDC's strategic approach to the district's local housing challenge. Sitting beneath the Spatial Plan, the Strategy provides more detailed direction on housing supply and outcomes, with a focus on affordability, availability, and long-term community wellbeing. It recognises that the district is experiencing sustained population and employment growth alongside a constrained housing market characterised by limited housing choice and quality.

The Homes Strategy identifies that despite high levels of residential construction, the housing being delivered is predominantly higher-value dwellings, and the current market is lacking in

sufficient affordable or workforce housing to meet community needs. It recognises the critical role of planning and development in improving housing outcomes, including through enabling a broader mix of housing typologies and supporting increased densities in appropriate locations.

The Project is consistent with the outcomes of the Homes Strategy as it delivers a significant increase in housing supply and provides a mix of housing types that support improved housing choice. The development will establish a well-designed, modern neighbourhood with secure rental accommodation, strong internal and external connectivity, and integrated local services and open spaces that support a safe, healthy, and cohesive community. Overall, the Project aligns with Council's strategic direction to deliver a wider range of housing outcomes and responds positively to the identified housing challenges facing the Queenstown Lakes District.

### **Queenstown Lakes Joint Housing Action Plan 2023-2028**

The Queenstown Lakes Joint Housing Action Plan 2023–2028 builds on the Queenstown Lakes Homes Strategy 2021 and was prepared by the Grow Well Whaiora Partnership, which is a partnership between Central Government, Kāi Tahu, Otago Regional Council and the Queenstown Lakes District Council. The Action Plan provides a coordinated, multi-agency response to the district's housing challenges.

The primary focus of the Action Plan is increasing the provision of housing, with particular emphasis on affordable housing for both rental and home ownership. Its key outcomes include increasing the supply of affordable housing options, improving housing choice, ensuring homes are warm, healthy, secure and sustainable, and strengthening partnerships to accelerate housing delivery.

The fifth Action Plan solution seeks to influence and incentivise developers to provide affordable housing, while the sixth solution focuses on delivering improved rental solutions for the district's workforce. Additionally, one of the key short-term actions identified in the Action Plan is enabling and supporting build-to-rent developments, recognising this delivery model as a mechanism for rapidly increasing long-term rental supply and improving housing choice for renters and the local workforce.

The Project is considered to be aligned with the objectives and direction of the Joint Housing Action Plan, including the fifth and sixth solutions, as it will deliver a significant increase in housing supply within a strategic growth area and is specifically intended for long-term rental occupation. The Project is planned for delivery in the short term, and will provide secure, professionally managed rental accommodation suitable for permanent residents, rather than short-term or visitor use. Homes will be designed and constructed to be warm, secure and affordable, supporting safe and healthy living environments.

Overall, the Project responds directly to the housing challenges identified in the Action Plan and gives effect to its objectives by increasing housing supply, improving housing choice, supporting secure long-term rental options, and overall contributing to the development of thriving and resilient communities within the Queenstown Lakes District.

### **Housing and Business Development Capacity Assessment (2025)**

The Queenstown Lakes District Housing and Business Development Capacity Assessment 2025 (HBA) provides an important evidence base for understanding housing demand, housing supply, and development capacity within the district. While the HBA identifies sufficient

plan-enabled housing capacity in the medium and long term, it also identifies a short-term shortfall of approximately 1,000 dwellings, driven primarily by infrastructure constraints within the Whakatipu Ward.

The HBA recognises that housing affordability is likely to remain a significant challenge and identifies new growth areas, including Te Pūtahi Ladies Mile, as key opportunities to improve housing outcomes. These areas are expected to support a broader mix of housing types that better align with demand, improving housing choice, market competitiveness, and affordability. The HBA also notes that the district's planning framework supports a growth pattern that includes both greenfield development and intensification within areas of high accessibility.

The Project will deliver housing within a strategic growth area identified as suitable for more intensive urban development. It contributes to addressing the short-term housing shortfall identified in the Whakatipu Ward, and coordinates development with infrastructure delivery in an accessible location. The Project is designed as a build-to-rent model for long-term rental occupation, and provides a range of housing sizes, supporting increased housing choice, market competition and affordability.

Overall, the Project aims to address short-term housing constraints identified in the HBA, and aligns with the HBA's emphasis on housing choice, affordability and coordinated infrastructure-led development to support well-functioning urban outcomes over time.

### **Iwi Management Plans**

#### **Te Tangi a Taurira – The Cry of the People: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan (2008)**

The Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 provides guidance for Ngāi Tahu ki Murihiku participation in environmental planning and resource management, consolidating iwi values, knowledge, and perspectives as an expression of kaitiakitanga. Relevant provisions include Policy 3.4.8.2, which seeks to ensure that building and development activities recognise landscape and geographic features of significance to Ngāi Tahu whānui, and Policy 3.4.13.5, which advocates for the protection and enhancement of waterways, riparian margins, and wetlands to safeguard indigenous biodiversity. The Project is considered consistent with these directions, with construction and operational stormwater able to be appropriately managed to avoid adverse effects on water quality.

Overall, the development aligns with the principles and objectives of the Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan (2008). It adopts a holistic and sustainable approach to land and water management through integrated stormwater treatment and low-impact urban design, collectively supporting the protection and enhancement of cultural and environmental values within the TPLM area.

The applicant acknowledges the mana whenua relationship with this landscape and remains committed to ongoing engagement with Ngāi Tahu representatives to ensure cultural values and kaitiakitanga principles continue to inform detailed design and implementation.

#### **Kai Tahu ki Otago Natural Resource Management Plan 2005**

The proposal is consistent with the Kāi Tahu ki Otago Natural Resource Management Plan 2005, as it recognises Kāi Tahu's relationship with the Whakatipu landscape, incorporates

measures to protect water quality and natural values, and supports sustainable land use within the takiwā. The project aligns with the Plan's direction to uphold kaitiakitanga, avoid adverse effects on waterways and mahika kai, and engage appropriately with Kāi Tahu through early and ongoing consultation.

*(2)(b) any other matters the Minister considers relevant.*

While no other matters are considered to be of particular interest or relevance, the Project will deliver a range of positive outcomes, including:

- **Acceleration of much-needed housing supply** in a location already identified for urban growth, helping to address acute rental shortages and supporting a more stable, long-term housing market.
- **Efficient use of land through higher-density, build-to-rent housing**, supporting a compact urban form that aligns with national and regional planning direction and reduces pressure for outward expansion.
- **Delivery of critical infrastructure upgrades**, including improved transport connections and significant three-waters investment, providing resilience and capacity not only for the development but for the wider TPLM area.
- **Coordinated staging of development and infrastructure**, ensuring upgrades are delivered ahead of demand and reducing long-term servicing costs for councils and ratepayers.
- **Support for the viability of the wider TPLM commercial centre and future school**, by delivering the population base required to sustain local services, reducing cross-bridge travel demand and strengthening community self-sufficiency.
- **Creation of an integrated open space network**, including pocket parks, green corridors, and high-amenity public spaces that enhance wellbeing, recreation, and ecological outcomes.
- **A transport system designed for mode shift**, with high-quality walking and cycling connections and streets capable of supporting future public transport, contributing to a safer and more accessible urban environment.
- **Economic stimulus through construction and long-term operations**, generating employment and supporting local businesses across the Queenstown Lakes District.
- **Strengthened community resilience**, with local services, open space, and active transport options reducing reliance on vulnerable transport corridors such as the Shotover Bridge.

#### **5.1.4. Land Exchange (s11(1)(f), s22(3), s22(4) and s42(4)(f))**

Not applicable. The project does not involve any land exchange.

### 5.1.5. S22(5), s22(6) and s22(7)

No marine consent is necessitated by this development under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (s42(4)(k) and as such s22(5) and s22(6) do not apply.

The project is not an aquaculture activity and as such s22(7) does not apply.

### 5.2. Consideration of Ineligible Activities (s13(4)(c), s23 and s24)

Under section 13(4)(c), a referral application must include information demonstrating that the project does not involve any ineligible activities (other than those that may be subject to determination under sections 23 or 24).

With reference to that section, the Project is not an ineligible activity because it is:

- Not located on identified Māori land [s 5(1)(a)]
- Not located within a customary marine title area [s 5(1)(b)];
- Not located within a protected customary rights area [s 5(1)(c)];
- Not located on Māori customary land or land set aside as a Māori reservation under Te Ture Whenua Māori Act 1993 [s 5(1)(d)];
- Not an aquaculture activity, nor incompatible with aquaculture [s 5(1)(e)];
- Not an activity requiring access arrangements under the Crown Minerals Act 1991 [s 5(1)(f) and (h)];
- Not an activity prevented under sections 165J, 165M, 165Q, 165ZC or 165ZDB of the Resource Management Act 1991 [s 5(1)(g)];
- Not an activity occurring on a national reserve held under the Reserves Act 1977 [s 5(1)(i)];
- Not an activity occurring on a reserve held under the Reserves Act 1977 that is vested in or managed by any entity other than the Crown or a local authority [s 5(1)(j) and (k)];
- Not an activity prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or under sections 15B and 15C of the Resource Management Act 1991 [s 5(1)(l)];
- Not a decommissioning-related activity [s 5(1)(m)]; and
- Not an offshore renewable energy project [s 5(1)(n)].

Sections 23 and 24 of the Act are therefore not relevant.

Accordingly, the Project is eligible for referral under the FTAA.

## 6. ENVIRONMENTAL EFFECTS OF PROJECT

The following assessment considers the anticipated and known adverse effects of the Project on the environment in accordance with Section 13(4)(h) of the FTAA.

The actual and potential effects on the environment associated with the proposed development can be broadly categorised into:

- Construction-related effects, and
- Ongoing effects once the development is completed and operational

The following section outlines the anticipated effects of the Project, informed by the preliminary technical inputs prepared for the TPLM process and experienced technical experts engaged by SLL for this Project. A number of these experts have provided memos in support of this referral application. These provide an initial understanding of the likely environmental effects and the basis for the proposed management approach. This assessment, along with the supporting technical material, will be further developed as part of the Substantive Application (should this referral be accepted), incorporating detailed design information, refined mitigation measures, and a full suite of proposed consent conditions.

The TPLM Special Purpose Zone is a direct response to the growing demand for additional housing in the Whakatipu Basin.

At the highest level, the overriding intention of the TPLM Zone is to maximise the provision of housing in response to the District's acute ongoing housing shortage. The Independent Commissioner's noted in their decision:

*"[W]e find that the evidence (unambiguously) supports the elevation of housing density, choice and affordability as the greatest resource management priority for the zone, followed then by environmental and ecological effects and benefits...."*

*"[W]e find that promotion of maximum achievable densities and built form quality should be the focus of resource consent assessments, not rule compliance for its own sake or the (unrealistic) principle that in what will become one of the most urban-character parts of the District a ruralness or visual nostalgia to the past can or should be realistically sought."*

**Reference: Independent Hearing Panel (2024) Final Report and Recommendations: Te Pūtahi Ladies Mile Plan Variation, Queenstown Lakes District Council, para. 13.13(g) and para. 13.24.**

### 6.1. Construction-related effects

#### Erosion and Sedimentation

Earthworks associated with the Project will be temporary in nature and associated with the development of the Site for urban, commercial and ancillary purposes. Appropriate erosion and sediment control measures will be in place during all earthworks to prevent sediment from leaving the Site or entering nearby waterways.

All proposed measures will be designed and implemented in accordance with the QLDC guidelines for Environmental Management Plans, with specific provision for erosion and sediment control during site preparation and construction. An accidental discovery protocol will be in place during earthworks to guide in the event of a discovery in accordance with Section 25.10 of the PDP.

## **Noise and Vibration**

Noise associated with construction will primarily result from excavation, filling and compaction activities, and building construction activities along with general vehicle movements on site. Vibration effects are not expected to be significant, given minimal cut and fill is required and no rock breaking. Any vibration that does arise is likely to be limited to periods of earthworks and compaction.

These noise and vibration effects will be intermittent, short-term, and confined to the construction period. All works will be undertaken in accordance with NZS 6803:1999 *Acoustics – Construction Noise*, which is standard industry practice. A suite of typical mitigation measures will be implemented to manage and reduce both on-site and off-site effects to acceptable levels, with these measures formalised through the Construction Management Plan. The final suite of mitigation measures, along with detailed implementation information, will be provided as part of the Substantive Application.

## **Dust and Air Quality**

Dust generation is expected to arise mainly from exposed earth surfaces during dry or windy conditions, particularly when excavation, filling, compaction, landscaping, stockpiling, and vehicle movements are underway. Minor dust may also occur during the handling of construction materials. These effects will be limited to the construction period, will fluctuate depending on activity and weather, and are temporary in nature.

Standard industry dust-control measures will be implemented to ensure effects are managed to acceptable levels, with the final suite of measures to be confirmed through the Construction Management Plan (or equivalent). At a high level, these measures are expected to include careful planning of works near sensitive receivers, avoiding activities during adverse weather, and ensuring adequate water supply for dust suppression. Additional controls may include windbreaks, minimising exposed surfaces, maintaining surface moisture during windy conditions, managing vehicle speeds and load handling, and applying water sprays or dust suppressants to stockpiles where required.

Detailed design, implementation methods, and the final mitigation package will be provided with the Substantive Application.

## **Traffic, Access and Parking**

Construction-related traffic, access, and parking effects will be managed through a Construction Management Plan, which will be developed alongside the detailed design phase. This plan will address expected vehicle types, access arrangements, and any appropriate timing controls for construction movements. A key objective will be to maintain the safe and efficient operation of the surrounding road network while ensuring construction vehicles can access the Site without causing unnecessary disruption to other road users. The final mitigation measures and implementation details will be provided as part of the Substantive Application.

## **Heritage and Archaeology**

There are no known sites of historic or cultural significance within the application Site or on adjoining land. Based on available information, it is considered unlikely that any such features remain within the development footprint.

Notwithstanding this, accidental discovery protocols will be applied across all areas of the Site, including locations that have not previously been disturbed and areas where restoration or earthworks are proposed. These protocols ensure that any unexpected finds are managed appropriately in accordance with legislative requirements and recognised best practice. Standard procedures, along with any specific matters arising from consultation with relevant

agencies and iwi, will be incorporated into the suite of consent conditions provided with the Substantive Application.

### External Infrastructure

The installation of new wastewater and water supply pipelines, including a potential alignment through Department of Conservation land and Council reserves, along with the formation of new road intersections, will generate short-term construction effects. These include earthworks, temporary access restrictions, construction traffic, noise, and localised sedimentation risks. Where works occur within or adjacent to public land, including DOC-administered areas or the state highway corridor, there may also be temporary impacts on public access and recreational use. These effects are localised, temporary and able to be appropriately managed through standard construction environmental management plans, erosion and sediment controls, traffic management plans, and coordination with DOC, Waka Kotahi, and QLDC.

## 6.2. Ongoing effects

### Land suitability – geotechnical, natural hazards and climate change (s13(4)(v))

A technical assessment of ground conditions has been undertaken by ENGEO and is included at **Appendix 10**. This assessment provides a detailed understanding of the site's geological and geotechnical characteristics, and is summarised as follows.

- The Site is underlain by a predictable sequence of topsoil, loess, and dense alluvial/glaciofluvial sands and gravels, with no shallow groundwater encountered. ENGEO notes that *“groundwater was not encountered within ENGEO nor historical geotechnical site investigations... ORC well data... indicates regional groundwater levels between 39–51 m depth”*. This means earthworks and foundations will not interact with groundwater, avoiding associated environmental risks such as dewatering, sediment-laden discharges, or instability.
- Earthworks are relatively modest, with cuts up to ~2.5 m and fills up to ~1.6 m. The report confirms that *slope instability is not a significant hazard, given the site is relatively flat* and that proposed cut slopes are low-risk when constructed at shallow angles. Environmental effects from earthworks are therefore expected to be low, provided standard erosion, sediment, and dust controls are implemented.
- The Site's alluvial soils are generally suitable for reuse as engineered fill, supporting a balanced cut-and-fill approach. ENGEO identifies *“material suitability for reuse as fill”* as a key consideration but confirms that alluvium is appropriate when compacted to NZS 4431 standards. This reduces the need for importing or exporting material, lowering truck movements and associated environmental effects.
- Liquefaction is not considered a risk due to deep groundwater. No active faults cross the site, and seismic effects are limited to ground shaking, which is addressed through standard structural design. Overall, residual environmental risk from natural hazards is low.
- The Site is suitable for shallow foundations bearing on loess or alluvium. ENGEO provides bearing capacities and notes that *“the site is suitable for shallow strip and pad foundations”*. This avoids the need for deep piles, reducing construction noise, vibration, and spoil generation.

There are no known direct climate change impacts, and any potential indirect effects, such as increased rainfall intensity or groundwater fluctuations, can be appropriately addressed through the design and construction phases.

Overall, the Site's ground conditions are well suited to the proposed residential development, provided standard engineering design and construction practices are followed. Further site-specific investigations will be undertaken at the detailed design stage to confirm key parameters such as slope stability, liquefaction susceptibility, and any localised mitigation requirements. These steps will ensure the development proceeds on a robust geotechnical foundation with no more than minor effects on the environment.

## **Infrastructure**

The proposed infrastructure approach for water supply, wastewater and stormwater disposal has been outlined in the Engineering Infrastructure Servicing Technical Memorandum. Consultation with QLDC has been undertaken, and will continue, to confirm the preferred servicing approach. The details of the proposed solution, including exact infrastructure location, capacity, necessary upgrades, and any associated staging requirements, will be finalised in conjunction with QLDC and provided within the Substantive Application.

The Site forms part of an area already identified through the recent rezoning process as a logical and anticipated location for future urban growth, with its servicing feasibility and strategic infrastructure requirements previously assessed at a district-wide level. The work now underway is focused on confirming the most efficient and preferred servicing solution within that established framework. As the project team continues to refine the design in collaboration with QLDC, the final configuration of water, wastewater and stormwater infrastructure will be resolved and submitted through the Substantive Application. This ensures the development proceeds in a manner consistent with the zone's intended outcomes and the wider planning strategy for the Ladies Mile growth area.

External infrastructure will be constructed as part of the Project. Once installed, the infrastructure will operate with minimal ongoing effects. Pipelines will be buried and not visible, with no anticipated adverse effects on landscape, ecological values, or public access. The new road intersections will integrate with the existing transport network and are expected to improve safety and efficiency by providing formalised access arrangements. The provisions of this external infrastructure is anticipated to result in positive long-term outcomes, including improved network resilience, enhanced servicing capacity, and safer transport connections that support both the development and the wider community.

Overall, the assessment confirms that the development can be sufficiently serviced in respect of stormwater, wastewater, water supply and utilities, and no more than minor adverse effects are anticipated as a result of infrastructure.

## **Transport**

A Transport Assessment prepared by Bartlett Consulting and peer reviewed by Don McKenzie Consulting Ltd is attached as **Appendix 11**. A comprehensive Integrated Transport Assessment will support the Substantive Application.

The report details the Project has been assessed against the relevant transport requirements of the QLDC District Plan and will generally comply with the expected standards for traffic generation, parking, access, and road design within the TPLM Zone. Any potential transport effects will be able to be appropriately managed through conditions.

The Project will include appropriate transport measures to manage vehicle traffic and include appropriate initiative to encourage public transport and active travel modes. These include long-term cycle parking provided at one space per residential unit; bus stops on SH6 with pedestrian and cycle crossings over SH6 at signalised SH6/Stalker Road Intersection; and footpaths and shared paths to provide active travel routes within the Site with connections to nearby retail, employment, education and leisure activities beyond the Site.

This report outlines the Project will introduce additional vehicle movements into an already constrained network. It is acknowledged that the wider SH6 corridor and local roads currently experience peak-period congestion. The report notes that the proposed development will not remove traffic congestion from the adjacent road network, but the effects of additional traffic are expected to be managed through the new signalised intersections and associated upgrades, which provide a more controlled environment for distributing traffic flows.

Overall, the transport layout has been designed to align with the intended transport network for the TPLM area and to ensure safe, efficient access for all travel modes. The report concludes that any transport effects can be appropriately managed to a point that is acceptable.

### **Landscape, Character, Amenity and Urban Design**

An Urban Design Statement prepared by Brewer Davidson is attached as **Appendix 12**.

The TPLM Zone is intended to accommodate one of the most densely populated neighbourhoods in the district, with minimum net densities of 40 units per hectare and an anticipated built form of up to 13m (and up to 24.5m further east).

Section 49.3.2.5 of the TPLM Zone sets a clear prioritisation for assessing infringements, focusing first on maximising housing density, choice and affordability, then on enabling higher standards of ecological sustainability and stormwater management, and then on achieving very high amenity and visual quality in public spaces. This framework has guided the masterplan from the outset. The Project delivers the higher-density, mixed-typology housing outcomes anticipated for the zone, within an integrated, landscape-led layout that supports enhanced stormwater and ecological outcomes and a high-quality public realm.

Across the Site, each apartment building incorporates a different mix and arrangement of the one to three bedroom unit types. This approach allows flexibility in block footprint, massing and height across the site, while contributing to external variation. The resulting built form avoids repetition and enables a visually diverse streetscape while also allowing blocks to respond accordingly to the immediate context within the site.

The Site sits in the foreground of Slope Hill, an outstanding natural feature, but it is also zoned for urban development. The apartment buildings exceed the 13m height limit by approximately one to three levels (approximately 3m – 9m). In this context, the proposed height exceedances need to be understood against the specific, limited matters of discretion in the Plan, none of which consider the views of the Slope Hill. The planning framework does not identify any protected viewshafts across the TPLM Zone, nor does it attribute any view-protection function to the indicative north–south collector road shown on the Structure Plan.

Nevertheless, as the absence of the north–south collector road is a deviation from the structure plan, the public view from Stalker Road has been considered. Drawing UD12 shows that the proposed buildings, including the taller blocks, sit below the ridgeline of Slope Hill and well beneath the Coronet Peak skyline, so the legibility of the outstanding natural feature and wider landscape context remains clearly expressed.

Building height is concentrated where it can be best absorbed, with taller buildings used to frame key open spaces, reinforce legibility, and maintain good sunlight access and outlook for residents through careful orientation and massing. Height is treated as one element within a wider urban design strategy, considered alongside shading, street width, spatial definition, and architectural variation, so that visual interest is created and dominance is reduced. The TPLM Zone's built-form standards for setbacks, outlook space, outdoor living areas and building separation have informed the masterplan, and the Project will comply with these as far as practicable while still achieving the integrated, higher-density urban form anticipated for the zone.

Overall, the built form achieves the minimum density anticipated by the TPLM planning framework while delivering a walkable, well-landscaped neighbourhood that aligns with the zone's core purpose of ensuring the most efficient practicable use of land for the provision of housing.

## **Ecological**

There are no waterways or wetlands on or near the Site, nor are any Significant Natural Areas located within the subject site.

The Site has historically been used for farming and there is little to no indigenous vegetation at present on the site.

The Project includes extensive open space areas and parks and proposes extensive planting of locally sourced indigenous species throughout the Site which will enhance ecological biodiversity and ecological corridors on the Site to the extent practicable for a higher density urban environment. This together with the proposed stormwater solution, in particular the increased permeable area element, provides a quality blue green network commensurate with the proposed development, a key ecological consideration through the development of the TPLM Zone. Existing established exotic trees within the Site will be retained where possible.

The installation of the external pipeline across DOC-administered land may give rise to a low likelihood of interacting with indigenous lizards, vegetation and/or birds, depending on the final alignment and ground conditions. While the construction corridor is expected to be highly modified and the probability of lizard presence is considered low, there remains a small potential for disturbance during earthworks. Any such effects would be limited to the construction phase and are expected to be minor and readily managed through standard precautions, such as pre-construction checks and appropriate handling protocols if required. The need for Wildlife Act authorisation will be confirmed at the Substantive Application stage.

Overall, any potential adverse ecological effects are considered to be less than minor

## **Economics**

The Economic Report sets out the benefits of the Project under two headings: quantified construction-phase impacts, and qualitative ongoing effects.

### ***Construction-Phase Economic Effects***

The economic evidence identifies substantial construction-phase benefits. Local project expenditure of \$472 million (2026–2030) generates \$1,006 million in total economic activity nationally, of which \$753 million occurs within the Queenstown Lakes District (QLD). This is

equivalent to over 4% per year of the local economy during the main construction period (2027–2030).

Employment effects are similarly significant. The Project supports 3,036 FTEs nationally, with 2,277 FTEs (75%) located in QLD. Peak employment occurs in 2029 at 860 FTEs nationally, including 647 FTEs within the district. On average, the Project supports 563 FTEs per year during the main construction years, representing over 2% of all jobs in the district.

Post-construction, the Project will support 40–50 permanent FTEs in property management and maintenance.

### ***Qualitative Ongoing Effects***

The Project delivers 1,064 permanent rental homes, equivalent to 4.7 years of rental supply based on the district's historic growth of 228 new rentals per year. The memo identifies this as likely the largest single addition to the district's rental stock.

The development directly targets one- and two-bedroom dwellings, the typology in shortest supply, consistent with QLDC's Housing and Business Development Capacity Assessment. All units remain in the long-term rental pool, providing permanent tenure security and avoiding conversion to holiday homes or short-term rentals.

The memo identifies significant affordability pressures in the district. The median rent-to-wage ratio is 55%, which is 15 percentage points higher than the national average. Median weekly rents in 2025 are \$550 for a one-bedroom and \$800 for a two-bedroom, representing a 77% increase since 2015. The house price-to-wage ratio is 20, double the national figure of 10. QLDC's Housing and Business Assessment identifies a shortfall of 3,120 dwellings below \$700,000 in 2026, rising to 5,150 by 2053.

As a build-to-rent operator, Simplicity Living sets rents to maintain high occupancy and low turnover. The memo notes that in Auckland, Simplicity Living's one- and three-bedroom rents are below local medians, with two-bedroom rents comparable to the area median.

The memo further highlights significant instability in Queenstown's rental market. On census night 2023, 28% of houses were empty, and by February 2026 there were approximately 4,200 active short-term rental listings, an increase of 1,100 since February 2023. It notes that the housing market tends to produce holiday accommodation because this is what the economics incentivise.

In contrast, build-to-rent provides permanent tenure security, as these homes cannot be converted into holiday homes, Airbnb, or absentee-owned dwellings. The memo also references previous work for QLDC showing a universal "weight lifted" effect from secure tenure, with residents reporting improved health, greater community engagement, and better school completion.

Queenstown's labour market faces 22% annual worker turnover, far above the national rate of 16%, driven in part by high housing costs that create a "seniority ceiling" and push mid-career professionals out of the district. This turnover imposes significant costs on local businesses and undermines workforce stability, at a time when district employment is projected to grow from 37,000 to 60,500 by 2053.

At the same time, the district has only 93 social rental dwellings (0.4% of stock) and a Queenstown Lakes Community Housing Trust waitlist exceeding 1,480 households, indicating severe pressure on lower-income renters. The memo concludes that large-scale, stable, affordable build-to-rent supply directly improves workforce retention and reduces pressure on the social housing system, providing much-needed long-term rental options for local workers and families.

Overall, the evidence shows that the Project delivers regionally significant economic benefits through a major construction-phase contribution to GDP and employment, long-term operational jobs, and substantial improvements to housing supply and affordability. By adding 1,064 permanent rentals in the typologies most needed, the development directly supports labour market stability, reduces high worker turnover, and eases pressure on the district's severely constrained social housing system. The Project's infrastructure investment further unlocks future development capacity and aligns with the FTAA's objectives to increase housing supply and deliver significant regional benefits.

### **Mana whenua values**

SLL has initiated consultation with the seven rūnaka identified as having mana whenua interests within the Queenstown Lakes District. The seven rūnaka are as follows:

- I. Te Rūnanga o Moeraki Incorporated ("Moeraki")
- II. Kati Huirapa ki Puketeraki Incorporated ("Puketeraki")
- III. Te Rūnanga o Ōtākou Incorporated ("Ōtākou")
- IV. Hokonui Rūnanga Incorporated ("Hokonui")
- V. Waihōpai Rūnaka Incorporated ("Waihōpai")
- VI. Te Rūnaka o Awarua Incorporated ("Awarua")
- VII. Oraka Aparima Rūnaka Incorporated ("Ōraka")

The applicant acknowledges the enduring relationship of mana whenua with this landscape and remains committed to ongoing engagement with Ngāi Tahu representatives to ensure cultural values and kaitiakitanga principles continue to inform detailed design and implementation.

The Project Site is located within the Ngāi Tahu takiwā (tribal area) and therefore within the broader area subject to the Ngāi Tahu Claims Settlement Act 1998, which recognise the rangatiratanga of Ngāi Tahu and their intrinsic relationship with whenua and natural resources. However, the Site itself is not identified as a Statutory Acknowledgement Area. The nearest Statutory Acknowledgement Area is Whakatipu-wai-māori (Lake Whakatipu), which is recognised for its significant cultural, spiritual, and historical importance to Ngāi Tahu.

The Project area does not include any parcels of Māori land, marae, or identified wāhi tapu, and it is not located within a Wāhi Tūpuna overlay under the PDP. The Site is not within the coastal marine area, and the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 does not apply.

The development adopts a holistic and sustainable approach to land and water management through integrated stormwater treatment and low-impact urban design, supporting the protection and enhancement of cultural and environmental values within the TPLM area.

As the design progresses, we will continue to work collaboratively with iwi to refine these elements and ensure that the development appropriately reflects the cultural landscape, integrates meaningful cultural design responses, and achieves an outcome that respects mana whenua values.

## **Reverse Sensitivity Effects**

The proximity of the Site to State Highway 6 means the development has the potential to generate reverse-sensitivity effects, particularly in relation to traffic noise. To address this, all residential units located within 80 m of the highway will be designed and constructed to ensure internal noise levels in habitable rooms do not exceed 40 dB LAeq(24hr), as required by Standard 49.5.38 of the TPLM Zone. An acoustic assessment will accompany the Substantive Application to confirm compliance and identify any specific construction measures required. Based on the Site context and the nature of modern building materials and façade treatments, achieving the required internal noise levels is expected to be readily achievable.

## **Summary**

The assessments undertaken to date confirm there are no impediments to the proposed development proceeding through the referral process under the FTAA.

The Site is zoned for urban development. The Project remains consistent with the intent of that rezoning, with refinements made to improve land use efficiency, and achieve enduring and high quality environmental and residential development outcomes.

The preliminary technical assessments across all key disciplines, including geotechnical, infrastructure, transport, urban design and economic, demonstrate that potential effects can be appropriately managed through standard design and mitigation measures. No significant environmental constraints or adverse effects have been identified that would prevent the Site from being developed for the proposed residential and mixed-use activities. Further detailed assessments, management plans, and mitigation measures will be provided as part of the Substantive Application to confirm design solutions, staging, and implementation details.

Overall, the information available confirms that the Project is suitable for progression through the FTAA process.

## 7. CONSULTATION & PERSONS AND GROUPS AFFECTED (s11 & s13(4)(j))

### 7.1. Summary of consultation undertaken

SLL has been consulting with relevant section 11 FTAA parties in relation to the development of the Site and the Project since the end of 2025.

A summary of this consultation is attached as **Appendix 13**.

The Fast-track Approvals Amendment Act 2025 made amendments to the consultation requirements in section 11 of the FTAA, requiring an applicant post 31 March 2026 to notify in writing some parties (including relevant local authorities), and give those parties 20 working days to respond. However, where an applicant has commenced consultation prior to 31 March 2026 (as SLL has for this Project), clause 10(2) of Schedule 1 provides that "the applicant is not required to notify any person or group referred to in section 11(1)(b) that the applicant consulted or started consulting before [31 March]". SLL had commenced consultation with all section 11 parties prior to 31 March and therefore is not required to formally notify parties under the new section 11.

QLDC has raised concerns that it does not consider SLL has satisfied the s11 requirements regarding notification as it relates to QLDC. SLL disagrees for the following reasons:

- SLL has been consulting with QLDC for several months about the development of the Site and this Project. While this was initially in the context of a project under the standard RMA process, any attempt from Council to distinguish consultation under the RMA to the Fast-track is unreasonable.
- An email chain from QLDC is appended to this report at **Appendix 14** which clearly shows consultation in the context of the current FTAA project commenced well before 31 March 2026. This is also documented in the consultation summary included at **Appendix 13**. For the reasons outlined above, under clause 10(2) of Schedule 1 SLL is not required to notify QLDC under the new section 11.
- QLDC has also raised concerns that the summary of the Project provided in the context of the FTAA proposal differs from the pre-application material discussed with its teams under the RMA process. However, the Project proposed for referral remains largely the same as has always been presented to Council.

Table 4 below identifies the persons, groups and entities consulted with for the purposes of this referral application.

**TABLE 4: SUMMARY OF PERSONS AND GROUPS CONSULTED**

Category	Person / Group
<b>Relevant local authorities (s13(4)(j)(i))</b>	<ul style="list-style-type: none"><li>• Queenstown Lakes District Council</li><li>• Otago Regional Council</li></ul>
<b>Iwi authorities and groups (s13(4)(j)(ii) (s13(4)(j)(iii))</b>	<ul style="list-style-type: none"><li>• Te Rūnanga o Ngāi Tahu (Iwi authority and Treaty Settlement entity - Ngai Tahu Claims Settlement Act 1998)</li><li>• Aukaha (Environmental entity)</li></ul> Iwi Authorities

	<ul style="list-style-type: none"> <li>• Te Ao Mārama Inc (Environmental entity)</li> <li>• Te Rūnanga o Moeraki Incorporated (“Moeraki”)</li> <li>• Kati Huirapa ki Puketeraki Incorporated (“Puketeraki”)</li> <li>• Te Rūnanga o Ōtākou Incorporated (“Ōtākou”)</li> <li>• Hokonui Rūnanga Incorporated (“Hokonui”)</li> <li>• Waihōpai Rūnanga Incorporated (“Waihopai”)</li> <li>• Te Rūnanga o Awarua Incorporated (“Awarua”)</li> <li>• Oraka Aparima Rūnanga Incorporated (“Ōraka”)</li> </ul>
<b>Relevant Treaty settlement entities (s13(4)(j)(iv))</b>	<ul style="list-style-type: none"> <li>• Te Rūnanga o Ngāi Tahu Iwi authority and Treaty Settlement entity - Ngai Tahu Claims Settlement Act 1998</li> </ul>
<b>Relevant protected customary rights groups and customary marine title groups (s13(4)(j)(v))</b>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<b>Ngā hapū o Ngāti Porou (s13(4)(j)(vi))</b>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<b>Groups under the Marine and Coastal Area (Takutai Moana) Act 2011 (s13(4)(j)(vii))</b>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<b>Persons with a registered interest in land under the Public Works Act 1981 (s13(4)(j)(viii))</b>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<b>Any other consultation (s13(4)(k)) including administering agencies (s11(1)(e))</b>	<ul style="list-style-type: none"> <li>• Department of Conservation</li> <li>• New Zealand Transport Agency</li> <li>• Ministry for the Environment</li> </ul>

It is noted that the Site has recently gone through a rezoning process, with this involving notification and subsequent submissions and a hearing process. To this end, the urban development outcomes across the Site have been considered at length, including any actual or potential effects on the surrounding environment (including impacts on directly adjoining properties, **Figure 18** below).



**FIGURE 18: ADJACENT PROPERTIES**

## **7.2. How the consultation has informed the project:**

Ongoing consultation with the above parties has directly informed and refined the project's design. Feedback from Councils, transport agencies, and their technical specialists has led to revisions to the infrastructure layout, including updated servicing solutions and staging to better align with network capacity. Engagement with QLDC Transport and NZTA has resulted in amendments to the roading design, clarification of required upgrades, and continued discussions on bus lanes, bus stop locations, and multimodal connections to ensure the transport network supports mode shift. Input from the Parks team has guided changes to the open space and parks design, improving functionality, accessibility, and alignment with Council's wider network planning. Collaboration with iwi representatives has also shaped the project's cultural expression, including the incorporation of iwi artists and cultural narratives in building design and open spaces. Collectively, this consultation has strengthened the proposal, ensuring it responds to stakeholder expectations and delivers a more integrated, resilient, and culturally grounded outcome.

## **7.3. Treaty Settlements [s13(4)(I)]**

The project area lies entirely within the takiwā of Ngāi Tahu, the sole iwi with mana whenua and Treaty settlement interests in the Queenstown Lakes District. No other iwi or hapū hold claims to this area. The Ngāi Tahu Claims Settlement Act 1998 applies to the project area and provides the cultural, environmental, and economic redress that recognises and upholds Kāi Tahu rakatirataka within their takiwā.

The Ngāi Tahu Settlement consists of four classes of redress transferred to Kāi Tahu:

- A Crown apology restoring the relationship between Kāi Tahu and the Crown
- Formal acknowledgment of Kāi Tahu's relationship with, and the significance of, Aoraki

- Cultural redress through legal instruments that recognise customary associations and enable Kāi Tahu participation in environmental management
- Economic redress, including asset transfers, purchase options, and a perpetual Right of First Refusal over specified Crown assets within the Kāi Tahu takiwā

There are no standalone principles set out in the Settlement, however Kāi Tahu exercises rakatirataka across the takiwā, with the Crown required to act in good faith. All places within the takiwā form an interconnected network of cultural values, and the Settlement provides the foundation for Kāi Tahu to continue expressing and evolving their ancestral relationship with the area into the future.

The Ngāi Tahu Claims Settlement Act provides a range of cultural and environmental redress provisions in or near the Whakatipu Basin, recognising Kāi Tahu's enduring relationship with key waterbodies, landscapes, and species. This includes Statutory Acknowledgements over significant waterbodies such as Whakatipu Waimāori (Lake Whakatipu). It further recognises the special relationship Kāi Tahu has with 49 bird species, 54 plant species, and 6 marine mammal species.

The Site is not within the coastal marine area, and the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 does not apply.

## 8. STATUTORY FRAMEWORK

### 8.1. National Policy Statements

No activities proposed are prohibited under the RMA. The Project is considered to be consistent with, and give effect to, the following national policy statements.

#### **8.1.1. New Zealand Coastal Policy Statement 2010 (as amended December 2025) (NZCPS)**

The NZCPS came into effect on 3 December 2010. It sets out the key challenges and issues affecting the coastal environment and specifies objectives and policies to give effect to the purpose of the RMA in the coastal environment of New Zealand. The Site is not located within or adjacent to the coastal environment. Accordingly, the NZCPS is not applicable to the site.

#### **8.1.2. National Policy Statement for Highly Productive Land 2022 (as amended December 2025) (NPS-HPL)**

The NPS-HPL came into force on 17 October 2022 and provides national direction for the protection of highly productive land.

The applicability of the NPS-HPL was addressed as part of the plan change that created the Te Pūtahi Ladies Mile Zone, and the final plan change report and recommendation<sup>5</sup> concluded that the NPS-HPL does not apply to the land within the Te Pūtahi Ladies Mile Zone, due to it being already identified as a future urban development area. Consequently, the NPS-HPL is not applicable to the site.

#### **8.1.3. National Policy Statement for Indigenous Biodiversity 2023 (as amended December 2025) (NPS-IB)**

The NPS-IB came into force on 4 August 2023. It sets out the objectives and policies relevant to indigenous biodiversity in New Zealand, and provides national direction to Councils to protect, maintain and restore indigenous biodiversity.

It is considered that the project is consistent with the over-arching objective and supporting policies of the NPS-IB for the following reasons:

- There are no Significant Natural Areas identified within the Site or within 500m of the site.
- The Site has historically been used for farming and there is little indigenous vegetation or biodiversity at present on the site. The Site is currently vegetated with pastoral grasses with some shelterbelts of exotic trees and shrubs.
- The project seeks to enhance indigenous biodiversity on the Site through the planting of locally sourced indigenous species.
- Engagement with iwi authorities is ongoing for this project.

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<sup>5</sup> <https://www.gldc.govt.nz/media/ok2n2jak/final-report-and-recommendations.pdf>

#### **8.1.4. National Policy Statement on Urban Development 2020 (as amended May 2022) (NPS-UD)**

The NPS-UD came into force on 20 August 2020 and sets out the objectives and policies relevant to the development of urban environments in New Zealand.

The Project is considered to be consistent with the objectives and relevant policies of the NPS-UD for the following reasons:

- The project will deliver a significant number of new dwellings to the Queenstown rental market through a comprehensively designed residential development. This will assist in addressing housing supply and affordability challenges in Queenstown and supports the objective of enabling competitive land and development markets.
- A range of unit sizes is proposed, accommodating different household types and supporting housing choice.
- Residential units are concentrated within taller apartment buildings, maximising residential amenity through the provision of extensive open space, landscaping, and shared community facilities.
- Building blocks are separated by open spaces and vary in height and cladding materials, contributing to visual interest and a positive streetscape. Communal areas, internal accessibility provisions, landscaped spaces and a park promote social interaction and a high level of liveability for future residents.
- The site's location in close proximity to Queenstown's centre provides residents with convenient access to employment, services, and amenities.
- Engagement with iwi authorities is ongoing for this project.
- Development of the project has been coordinated with Queenstown Lakes District Council and will be delivered alongside private infrastructure upgrades, including roading, stormwater, wastewater, water supply, electricity and telecommunications.
- The development supports reduced reliance on private vehicles through the provision of bus stops and secure cycle storage. Mobility parking is also provided throughout the development to support residents with differing accessibility needs.

#### **8.1.5. National Policy Statement for Freshwater Management 2020 (as amended December 2025) (NPS-FM)**

The NPS-FM came into force on 3 September 2020, and provides national direction for the sustainable management of freshwater resources, with a focus on protecting freshwater values and avoiding degradation of water quality.

There are no rivers, lakes or wetlands located in or within 100 metres of the site, and the Site is not identified as being within a Significant Natural Area. Stormwater generated by the Project up to the 1% AEP event will be managed onsite through an integrated treatment and detention system, consistent with best practice and relevant standards. In extreme rainfall events greater than the 1% AEP event, stormwater will follow natural drainage patterns via overland flow paths toward Shotover River. There are no wetlands identified within these overland flow paths.

Accordingly, the Project is considered to be consistent with the over-arching objective and policies of the NPS-FM.

### **8.1.6. National Policy Statement for Natural Hazards 2025 (NPS-NH)**

The NPS-NH came into force on 15 January 2026, and requires local authorities to manage seven specified natural hazard risks associated with subdivision, use, and development using a risk-based approach and the best available information.

The NPS-NH identifies seven natural hazard risks that decision-makers must consider: flooding, coastal erosion, coastal inundation, tsunami, landslip, liquefaction and active fault rupture.

The Site has been assessed for natural hazards through the Te Pūtahi Ladies Mile Plan Variation process and has been further reviewed for the purposes of this referral application.

Based on the best available information:

- Under the ORC Natural Hazards Portal, the Site is not identified as being subject to flooding, landslip, coastal erosion, coastal inundation, or tsunami risk.
- The Site is also not identified as being within an active fault area.
- Liquefaction susceptibility mapping identifies the entire Site as having nil to low liquefaction susceptibility, which is consistent with the wider Queenstown basin and can be appropriately managed through standard geotechnical and structural design.

The proposed development does not introduce new natural hazard risks, nor does it increase the level of risk on surrounding land. Applying a proportionate, risk-based approach consistent with the NPS-NH, it is considered that avoidance of development is not required and that any natural hazard risks can be managed to a low and acceptable level through standard mitigation measures. Accordingly, the Project is considered to be consistent with the over-arching objective and supporting policies of the NPS-NH.

### **8.1.7. National Policy Statement for Infrastructure 2025 (NPS-I)**

The National Policy Statement for Infrastructure 2025 (NPS-I) came into force on 15 January 2026 and provides national direction to recognise and provide for the development, operation, maintenance and upgrading of infrastructure, while appropriately managing adverse effects. The NPS-I emphasises the importance of infrastructure in enabling housing supply, supporting economic wellbeing and delivering well-functioning urban environments.

The Project involves the development of infrastructure to support urban growth at Te Pūtahi Ladies Mile, including transport, water supply, wastewater and stormwater infrastructure, both internal and external to the site. Much of this external infrastructure will ultimately be vested in and operated by Queenstown Lakes District Council and will form part of the district's municipal infrastructure network.

The Project is considered to be consistent with the over-arching objective and supporting policies of the NPS-I for the following reasons:

- The Project enables the efficient provision and upgrading of infrastructure required to support planned urban growth within an area expressly identified for development through the TPLM Plan Variation.
- Infrastructure delivery is integrated with land use planning, ensuring that development is supported by timely and coordinated transport and three-waters infrastructure, consistent with a well-functioning urban environment.
- The Project includes significant infrastructure investment, including upgrades that will provide capacity and resilience benefits beyond the Site itself, facilitating development across the wider Ladies Mile area.

- The Project plans a coordinated and staged infrastructure approach, aligning infrastructure provision with development sequencing to manage effects, reduce long-term costs and support efficient operation of networks.
- Any adverse effects associated with infrastructure construction and operation can be appropriately managed through design, staging, and standard consent conditions.

Overall, the Project recognises the functional and operational needs of infrastructure and provides for its development in a manner that supports housing delivery, urban growth and regional wellbeing. Accordingly, the Project is considered to be consistent with the over-arching objective and policies of the NPS-I.

## **8.2. National Environmental Standards**

It has not been identified that the Project requires resource consent under any of the National Environmental Standards, therefore an assessment is not required.

## **9. CONCLUSION**

This report and planning assessment outlines how the Project aligns with the requirements of the FTAA and provides a high-level evaluation confirming that there are no planning-related barriers to the Project being accepted as a referred Project. The Project has very clear significant regional benefits, and will provide a much needed injection of housing for the Queenstown community in the short to medium term. The necessary eligibility and consultation steps have been completed, with the outcomes summarised and supported by the relevant technical inputs.

The Project is informed by the preliminary technical work prepared specifically for this referral, alongside relevant assessments carried over from the TPLM plan variation process. Collectively, this material demonstrates that any potential effects can be appropriately managed through established mitigation and management measures, with the detail to be refined and confirmed as part of a future Substantive Application.

Overall, the information provided supports the conclusion that the Project meets the relevant FTAA requirements and is capable of delivering a well-designed neighbourhood that contributes positively to the wider urban environment and region, without giving rise to significant adverse effect.