

Memorandum on Completeness and Scope

File	FTAA-2607-1264
Application	Simplicity Living - Te Pūtahi Ladies Mile
To	Team Leader LOA
From	
Date	15 September 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Simplicity Living - Te Pūtahi Ladies Mile application, lodged by Simplicity Living Limited (the Applicant), received by the Fast-track Team on 7 August 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.

5. The Application was referred by the Minister for inclusion in the Fast-track consenting process under section 28 of the Act. The Minister accepted the referral application on 3 June 2026 and notified the EPA of the decision on the referral application on 3 June 2026.
6. The Application was lodged on 7 August 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was subject to a further information request therefore the date by which the EPA must make a decision under 46 is 4 September 2026.
7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The referred project is to:

“Construct and establish a residential development under a build-to-rent model along Ladies Mile in Queenstown, on approximately 10 hectares of land.

The project area is located at and adjoining 12 Lower Shotover Road, Queenstown [Lot 3 DP 606744, Lot 2 DP 617529 and Section 9 SO 485598], within the Otago Region, and includes adjacent or nearby land and road reserves required to enable associated transport and three waters infrastructure works.

The project involves:

- i. approximately 1,100 residential units, across a mix of three storey walk-up apartments and five to seven storey apartment buildings*
- ii. community facilities, including community rooms, indoor recreation and family spaces, open spaces and parks, and onsite car parking (including in buildings)*
- iii. local commercial and retail activities*
- iv. the provision of new internal roads within the site and upgrades to the external roading network*
- v. the construction of a signalised intersection and bus lane on State Highway 6.*
- vi. the provision of new, and upgrades to existing, three waters infrastructure, including stormwater management, water supply, and wastewater services, both internal and external to the site*
- vii. fee simple subdivision to create development lots, roads, and a park to vest in Queenstown Lakes District Council*
- viii. unit title subdivision of the walk up and apartment buildings*

ix. *bulk earthworks to facilitate the development internally and externally to the site.*"

9. Additionally, the referred project description provides that:

10. *"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)." (p. 7), and "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." (p. 31).*

11. As described in section 3.3 (page 16 – 17) of the Substantive Application document, the application is for the following project:

The Applicant seeks approvals under the FTAA to establish a comprehensive residential neighbourhood which will operate as long-term rental accommodation, at and adjacent to 12 Lower Shotover Road in Queenstown [Lot 3 DP 606744, Lot 2 DP 617529 and Section 9 SO 485598]. The key components of the Project are summarised as follows, with further detail provided in Section 0 of this report:

- i. *1,085 residential units in a mix of three-level walk-up apartments and five to eight-level apartment blocks*
- ii. *Four resident community buildings and a communal space on the top level of building 30, including work-from-home spaces, indoor recreation and family spaces*
- iii. *Various pergola and BBQ spaces*
- iv. *Two car parking buildings, providing 600 carparks including 6 electric vehicle (EV) charging stations, in addition to 505 on-street carparks*
- v. *Resident and visitor cycle parking*
- vi. *A leasing office and café*
- vii. *A commercial / retail lot for a local shopping centre*
- viii. *A local park with the possibility of being publicly and available*
- ix. *Internal roading, pedestrian and cycle connections, and landscaping*
- x. *New and upgraded transport and three waters infrastructure*
- xi. *Fee simple subdivision to create development lots, park, and roads to vest.*

12. Additionally, pages 14, 19 and 22 of the Substantive Application document provide:

"The approvals sought comprise district and regional consents for the proposed residential development, subdivision, transport and three waters infrastructure, and associated external infrastructure earthworks. The application also seeks a concession for a public water supply pipeline within Department of Conservation (DOC) administered marginal strip land, and a Wildlife Approval relating to the management of indigenous lizards." (p. 14)

"The Project will deliver a comprehensive build-to-rent residential neighbourhood within the TPLM [Te Pūtahi Ladies Mile] urban growth area, comprising 1,085 long-term rental homes, a local

shopping centre lot, resident community facilities, open space, internal transport connections, subdivision, earthworks, and associated three waters and transport infrastructure." (p. 19).

"...together with additional areas of legal road, and Crown land (marginal strip) required for the associated transport and three waters infrastructure upgrade works." (p. 22).

13. The application relates solely to the referred project.
14. Section 5.8 of the Substantive Application document (pages 60-61) confirms the application includes the construction of a signalised intersection and bus lane on State Highway 6, in line with the referred project description.
15. Both project descriptions are for works at and adjacent to 12 Lower Shotover Road in Queenstown, and include a residential rental neighbourhood/build-to-rent development, approximately 1,100 residential units, a mix of 3-storey walk-up apartments and larger apartment buildings, community facilities and recreation spaces, commercial/retail activities, internal roads, upgrades to the external roading network and transport infrastructure/connections, onsite car parking, subdivision, earthworks, new and upgraded three waters infrastructure, a park/open space, and fee simple subdivision to create development lots, roads and a park to vest.
16. The difference between 1,100 and 1,085 residential units is 15 units, a variance of 1.4% which is immaterial. The biggest difference is between the five to seven storey apartment buildings in the referred project description and the five to eight-level apartment blocks described in the Substantive Application document were subject to a request for further information (Appendix 3).
17. Per their response to the request for further information (RFI) in Appendix 3, the applicant provided that "one apartment building (Building 30, shown in Appendix C – Architectural Drawings) includes an eighth storey. The residential component of this building remains seven storeys, which is fully consistent with the referral order description and the 1,085 units proposed in the substantive application is within the referred scope of approximately 1,100 residential units".
18. Overall, the applicant considers that the proposal maintains the same development footprint, urban form, and overall built character. The final height of Building 30 does not generate new or materially different effects beyond those already identified in the referral Assessment of Environmental Effects (AEE). Therefore, this has been assessed as within scope of the referred project description.

Fast-track consenting application process

Legislative context

19. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;

- the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
20. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

21. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
22. This application has been lodged by Simplicity Living Limited. This person is the authorised person under the Act as specified in the Notice of Decision for the Referral Application.
23. The approvals being sought are:
24. approvals described in section 42(4)(a) and (c) (resource consent and certificate of compliance);
25. A resource consent, change to or cancellation of a resource consent: **checklist A**;
26. including subdivision: **checklist A1**;
27. A certificate of compliance: **checklist B**;
28. an approval described in section 42(4)(e) (concession), **checklist D1**;
29. an approval described in section 42(4)(h) (wildlife approval), **checklist E**;
30. All of the above listed approvals are of the type set out in section 42(4) of the Act.
31. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

32. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at **Appendix 1**.

Section 44 Requirements

33. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at **Appendix 1**.

34. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in **Appendix 2**.
35. As set out in more detail in Appendix 2, the agencies consulted have advised that the information required by section 44 is **not** provided in sufficient detail to satisfy the purpose for which it is required.

Ineligibility

36. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA must consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
37. The list of ineligible projects includes activities:
- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
 - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
 - within an aquaculture settlement area without the required authorisation;
 - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
 - that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977; or
 - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
 - That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
 - That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
 - That are undertaken for the purposes of an offshore renewable energy project.
38. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Fees and levies

39. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST; and
 - Levy in the sum of \$140,000 plus GST.

Consultation

40. I have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- Queenstown Lakes District Council (QLDC) and Otago Regional Council (ORC) for:
 - an approval described in section 42(4)(a) (resource consent)
 - an approval described in section 42(4)(c) (certificate of compliance)
 - The Department of Conservation for:
 - an approval described in section 42(4)(e) (concession)
 - an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
41. A summary of the consultation is included as **Appendix 2**.

Requests for further information

42. I requested further information from the applicant under section 46(2A) on **24 August** in relation to the height of apartment buildings, wildlife approvals, and the GPS location of a concession area.
43. The applicant responded with the information on **1 September** within the 20- working timeframe afforded by section 46(2B). A full copy of the request and response can be found in **Appendix 3**.

Assessment of compliance for each section of each application form

44. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in **Appendix 1** for ease of reference.
45. My view is that the application **complies** with section 46 and the EPA may now notify the applicant of its decision.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	FTAA-2607-1264 (Substantive Application, Section 5, Page 47)	Addressed, as stated by the applicant. Pages 47 – 74.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	FTAA-2607-1264 (Substantive Application, Section 4.1, Page 22)	Addressed. • Substantive Application, Section 4.1, Page 22-28 • Substantive Application, Section 4.3. Page

5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.	FTAA-2607-1264 (Substantive Application, Section 6, Page 75, Section 7, Page 79)	Addressed, in section 7.1 of the Substantive Application (Page 79).
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).	FTAA-2607-1264 (Substantive Application, Section 4.1.1, Page 24, Section 4.1.3, Page 27) Appendix T - Adjacent Owners and Occupiers	Addressed, as stated by the applicant.
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	FTAA-2607-1264 (Substantive	Addressed, as stated by the applicant.

		Application, Section 7.2, Page 79)	<i>“There are no other activities that are part of the Project to which the Application relates.”</i>
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	FTAA-2607-1264 (Substantive Application, Section 7.3, Page 79)	Addressed, as stated by the applicant (pages 79-80).
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	FTAA-2607-1264 (Substantive Application, Section 13.6.1, Page 166)	Addressed, as stated by the applicant. More fulsome content for sections 5 and 6 at this section. Addressed at a high-level for section 7 with relevant ‘other matters’ being discussed elsewhere throughout the Substantive Application document.
5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement:	FTAA-2607-1264 (Substantive Application, Section 7.4, Page 80) Appendix Z - Rule Compliance Assessment; Appendix AA -	Addressed, as described by the applicant (pages 80-93). The following documents have been assessed: • The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

	• a regional policy statement or proposed regional policy statement; • a plan or proposed plan; • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.	Objectives and Policies Assessment	• Water Conservation (Kawarau) Order 1997 National Policy Statements (Schedule 5, clause 5(2)(c)) • The National Policy Statement for Indigenous Biodiversity 2023 • The National Policy Statement on Urban Development • The National Policy Statement for Freshwater Management 2020 • National Policy Statement for Natural Hazards 2025 • National Policy Statement for Infrastructure 2025 • National Policy Statement for Renewable Electricity Generation 2011 • Otago Regional Policy Statement 2021 • Otago Regional Plan: Water for Otago • Queenstown Lakes Proposed District Plan • Te Tangi a Tauira – The Cry of the People: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008
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			Kai Tahu ki Otago Natural Resource Management Plan 2005 Section 7.4.4 states “<i>The NZCPS is not considered applicable to the Project as the Site is not located within or adjacent to the coastal environment.</i>”
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	FTAA-2607-1264 (Substantive Application, Section 4.3, Page 29)	Addressed, as stated by the applicant.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	FTAA-2607-1264 (Substantive Application, Section 4.3, Page 29, Section 7.0, Page 79)	Addressed, as stated by the applicant.
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	FTAA-2607-1264 (Substantive	Addressed, as stated by the applicant.

		Application, Section 11, Page 154) Appendix Y - Proposed Conditions of Consent	
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	FTAA-2607-1264 (Substantive Application, Section 13.4.2, Page 163) Appendix CC - s30 letter and ORC response	Addressed, as stated by the applicant.
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	FTAA-2607-1264 (Substantive Application, Section 8, Page 94)	Addressed, partially as stated by the applicant. Alternative discharge options (6(1)(c)(ii)) addressed at page 13.6.2, p. 169 of the Substantive Application. Section 13.6.1.2 (p. 167 of the Substantive Application) records engagement with iwi partners, identifies matters raised through

			consultation, and explains how feedback informed project design, including stormwater management, earthworks planning, landscape integration, Te Mana o te Wai considerations, landform modification, and construction protocols. The Consultation Report (Appendix U) provides further detail relevant for 6(1)(e).
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	FTAA-2607-1264 (Substantive Application, Section 8, Page 94)	Addressed, as stated by the applicant. Section 8 addresses social, economic, cultural, landscape, visual, ecological, contaminant discharge, noise and natural hazard effects.
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the	FTAA-2607-1264 (Substantive Application, Section 8, Page 94)	Addressed, as stated by the applicant.

	environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:		
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	(g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:	FTAA-2607-1264 (Substantive Application, Section 8, Page 94)	Addressed, as stated by the applicant.

	(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.		
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	FTAA-2607-1264 (Substantive Application, Section 6.4, Page 77) Appendix Z - Rule Compliance Assessment	Addressed, as stated by the applicant.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	FTAA-2607-1264 (Substantive Application, Section 4.3, Page 29 and Section 7.0, Page 79)	Addressed, as stated by the applicant.

5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	FTAA-2607-1264 (Substantive Application, Section 7.0, Page 79)	Addressed, as stated by the applicant.
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CHECKLIST A1 – Subdivision or reclamation resource consent

Clause, Schedule 5	Information required for an application for a subdivision consent or a reclamation consent (in addition to the information required in Checklist A)	Application Reference	EPA
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If this application is for a subdivision consent, please adequately define the matters set out in clause 8(1) below. If no subdivision consent is sought, please enter n/a.

8(1)(a)	The position of all new boundaries	FTAA-2607-1264 Appendix A – MCCL Engineering Plans within Appendix L - Civil Engineering Infrastructure Report	Addressed as stated by the Applicant. Document referenced: “ <i>Appendix L - Appendix A - MCCL Engineering Plans_Part1</i> ”
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		Plan Reference: Subdivision Plan – Drawing number 4163-0- 100 Revision A, prepared by McKenzie & Co, dated 14/07/26	
8(1)(b)	The areas of all new allotments, unless the subdivision involves a cross lease or company lease or unit plan	FTAA-2607-1264 Appendix A – MCCL Engineering Plans within Appendix L - Civil Engineering Infrastructure Report Plan Reference: Subdivision Plan – Drawing number 4163-0- 100 Revision A, prepared by McKenzie & Co, dated 14/07/26	Addressed as stated by the Applicant. Document referenced: “ <i>Appendix L - Appendix A - MCCL Engineering Plans_Part1</i> ”

8(1)(c)	The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips	FTAA-2607-1264 Appendix A – MCCL Engineering Plans within Appendix L - Civil Engineering Infrastructure Report Plan Reference: Subdivision Plan – Drawing number 4163-0- 100 Revision A, prepared by McKenzie & Co, dated 14/07/26	Addressed as stated by the Applicant. Document referenced: “ <i>Appendix L - Appendix A - MCCL Engineering Plans_Part1</i> ”
8(1)(d)	The locations and areas of existing esplanade reserves, esplanade strips, and access strips	NA	Not Applicable as stated by the applicant.
8(1)(e)	The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991	NA	Not Applicable as stated by the applicant.

8(1)(f)	The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991	NA	Not Applicable as stated by the applicant.
8(1)(g)	The locations and areas of land to be set aside as new roads	FTAA-2607-1264 Appendix A – MCCL Engineering Plans within Appendix L - Civil Engineering Infrastructure Report Plan Reference: Subdivision Plan – Drawing number 4163-0- 100 Revision A, prepared by McKenzie & Co, dated 14/07/26	Addressed as stated by the Applicant. Document referenced: “ <i>Appendix L - Appendix A - MCCL Engineering Plans_Part1</i> ”

If this application is for a reclamation consent, please include the information to show the area to be reclaimed set out in clause 8(2) below. If no reclamation consent is sought, please enter n/a.

8(2)(a)	The location of the area to be reclaimed	NA	Not Applicable as stated by the applicant.
8(2)(b)	If practicable, the position of all new boundaries	NA	Not Applicable as stated by the applicant.
8(2)(c)	Any part of the reclaimed area to be set aside as an esplanade reserve or esplanade strip	NA	Not Applicable as stated by the applicant.

CHECKLIST B – Certificate of compliance

Clause, Schedule 5	Information required for an approval described in section 42(4)(c), Clause 11 Schedule 5	Application Reference	EPA
11(1)(a)	A description of the proposed activity	FTAA-2607-1264 (Substantive Application, Section 6.5, Page 77) Appendix Z - Rule Compliance Assessment	Addressed, as stated by the applicant (pages 77-78 refer)
11(1)(b)	confirmation that the application for the certificate of compliance complies with section 46(2)(a), (b) and (d) being;	FTAA-2607-1264 (Substantive	Addressed in section 7.1 (page 79) of the substantive application.

	• section 42; and • sections 43 and 44; • relates solely to a listed project or a referred project; • any fee, charge, or levy payable under regulations in respect of the application is paid.	Application, Section 7, Page 79)	
11(1)(c)	a description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the application for the certificate of compliance relates	FTAA-2607-1264 (Substantive Application, Section 7.3, Page 79)	Addressed, as stated by the applicant (pages 79-80 refer)
11(1)(d)	an explanation of how the activity meets the relevant provisions of the district or regional plan, and any relevant national environmental standard.	FTAA-2607-1264 (Substantive Application, Section 6.5, Page 77, Section 7.4, Page 80) Appendix Z - Rule Compliance Assessment; Appendix AA - Objectives and Policies Assessment	Addressed, as stated by the applicant.

11(2)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, the application must include an assessment of the activity against any resource management matters set out in that document.	FTAA-2607-1264 (Substantive Application, Section 4.3, Page 29, Section 7.0, Page 79)	Addressed, as stated by the applicant.
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CHECKLIST D1 – Concession

Clause, Schedule 6	Information required for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6	Application Reference (Name of document, section and page)	EPA
3(1)(a)	A description of the proposed activity	FTAA-2607-1264 (Substantive Application, Section 9.1, Page 135)	Addressed, as stated by the applicant.
3(1)(b)	A description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and	FTAA-2607-1264 (Substantive	Addressed, as stated by the applicant and in response to the

	management arrangements, and, if applicable, the name, of the places)	Application, Section 9.2, Page 136)	Request for further information (RFI) (see Appendix 3).
3(1)(c)	Information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less	FTAA-2607-1264 (Substantive Application, Section 9.3, Page 137)	Addressed, as stated by the applicant.
3(1)(d)	In the case of an application for: • a concession that would otherwise be applied for under the Conservation Act 1987, section 14AA of the Wildlife Act 1953, or section 49 of the National Parks Act 1980; or • a concession as defined in section 2(1) of the Reserves Act 1977 that would otherwise be applied for under section 59A of that Act; information about the extent to which the project is consistent with: (i) the relevant conservation management strategy and conservation management plan; (ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity.	FTAA-2607-1264 (Substantive Application, Section 9.4, Page 137)	Addressed, as stated by the applicant.

3(1)(e)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977	FTAA-2607-1264 (Substantive Application, Section 9.5, Page 138)	Addressed. Noted as not relevant at this section of the Substantive Application. Section 9.5 (page 138) notes that “ <i>Clause 3(1)(e) is not relevant</i> ”.
3(1)(f)	Information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration	FTAA-2607-1264 (Substantive Application, Section 9.5, Page 138)	Addressed, as stated by the applicant.
3(1)(g)(i)	A description of the potential effects (positive and negative) of the proposed activity	FTAA-2607-1264 (Substantive Application, Section 9.6, Page 139)	Addressed, as stated by the applicant. (Pages 139-141)
3(1)(g)(ii)	A description of any actions that the applicant proposes to take to avoid remedy, mitigate, offset or compensate for any adverse effects of the proposed activity	FTAA-2607-1264 (Substantive Application, Section 9.6, Page 139)	Addressed, as stated by the applicant, particularly on pages 140–141.
3(1)(g)(iii)	A description of details of the type of concession for which the applicant is applying	FTAA-2607-1264 (Substantive Application, Section 9.6, Page 139)	Addressed, as stated by the applicant, particularly on page 141. “ <i>The Applicant seeks an easement concession</i> ”

3(1)(h)	A statement of the proposed duration of the concession and the reasons for the proposed duration	FTAA-2607-1264 (Substantive Application, Section 9.7, Page 141)	Addressed, as stated by the applicant.
3(1)(i)	Relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence or has any current criminal charges pending before a court)	FTAA-2607-1264 (Substantive Application, Section 9.8, Page 142)	Addressed, as stated by the applicant. Also, Appendix B: Capability Statement.
3(1)(j)	If applying for a lease, a licence granting an interest in land, or an easement, (i) reasons for the request; and (ii) sufficient information to satisfy the panel that, in terms of clause 7 (criteria for assessment of application for concession), it is appropriate under section 81(decisions on approvals sought in substantive application) to grant the lease, licence, or easement (as the case may be)	FTAA-2607-1264 (Substantive Application, Section 9.9, Page 142)	Addressed, as stated by the applicant.
3(1)(k)	Full details of any consultation undertaken with relevant iwi and with reserve owners and managers	FTAA-2607-1264 (Substantive Application, Section 9.10, Page 143)	Addressed, as stated by the applicant. Also refer to Appendix U.

3(1)(l)	Information about financial and legal liabilities and obligations associated with the land	FTAA-2607-1264 (Substantive Application, Section 9.11, Page 143)	Addressed, as stated by the applicant. The Applicant acknowledges that the concession holder (ie. QLDC) will be responsible for meeting any financial obligations.
3(1)(m)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve	FTAA-2607-1264 (Substantive Application, Section 9.12, Page 143)	Addressed, as stated by the applicant. The applicant notes here that <i>“This clause is not applicable to the Project.”</i>
3(1)(n)	Confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that right for the purposes of any lease proposed in the application if— (i) the proposed lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (ii) the granting of the lease would trigger the right of first refusal or right of offer or return.	FTAA-2607-1264 (Substantive Application, Section 9.13, Page 143)	Addressed, as stated by the applicant. The applicant notes here <i>“We do not understand SLL to be seeking a concession which would trigger a right of offer or return”.</i>

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	FTAA-2607-1264 (Substantive Application, Section 10.2, page 145)	Addressed, as stated by the applicant.
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)	FTAA-2607-1264 (Substantive Application, Section 10.2, page 145)	Addressed, as referenced and in the RFI response from the applicant (Appendix 3 – RFI response 1): "For both McCann's skink and Southern Grass skink, the use of the Kelvin Heights areas as a release site will be suitable. However, the carrying capacity of this proposed release site will need to be assessed in further detail once lizard surveys at the impact site determine the species presence and the population densities." RFI response 2 (Appendix 3): "As previously advised, the species most likely to be present

			within the project area, primarily McCann's skink, are common (classified as Not Threatened) and typically occupy modified or disturbed environments. The Lizard Habitat Assessment also identified the possibility of Southern grass skink which is classified as At Risk – Declining as being present. The development footprint itself is not high-value lizard habitat; it comprises previously farmed land and a small area of hedging within the water supply pipeline (concession area). Wildlands consider this to be overall low-quality habitat lacking significant refugia, dense grassland, and is highly fragmented. Given this context, the potential adverse effects are confined to temporary disturbance during vegetation clearance and earthworks, the possibility of accidental injury during construction, and the loss of low-value habitat. These effects occur at the site scale only and do not extend to population-level impacts. There is no risk of local extinction or loss of regionally significant habitat. The methods proposed for surveying, salvaging, handling, and relocating lizards are standard DOC-aligned practices designed specifically
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			for the species expected to be present. These include pre-construction surveys, progressive habitat reduction, lizard salvage and release, and an incidental discovery protocol to ensure safe and humane handling. From a planning perspective, these measures avoid adverse effects where practicable and minimise them where avoidance is not practicable. Wildlands' detailed methods are contained in Attachment A."
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	FTAA-2607-1264 (Substantive Application, Section 10.3, page 145)	Addressed, as stated by the applicant. Note, this is addressed at a high level. Note the lizard surveys and Lizard Management Plan (LMP) are to be developed.
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	FTAA-2607-1264 (Substantive Application, Section 10.4, page 146)	Addressed, as referenced, Appendix P (Lizard Habitat Assessment), and in the RFI response from the applicant (Appendix 3). Section 10.4 provides a list of predicted lizard species, but no details on the numbers present or impacted. "Two species of indigenous lizards may be present on site based on the location and habitat present (Table 1). McCann's skink (Not

			Threatened) are likely to be present on site as this species is known to be widespread and abundant in the region, including in marginal habitats such as rank grassland in farmland and suburban areas, where the species can often be found at high densities. Southern grass skink (At Risk – Declining) are possible, but unlikely, present, as they can also be found in rank grassland, but this species is patchily distributed and generally found at 5 significantly lower densities than McCann's skink in lowland areas around Queenstown and Central Otago. Potential lizard habitats identified at 12 Lower Shotover Road include areas of rank grassland which are widely distributed across the site, including in the following areas: • Along the Lower Shotover Road road margin, and between Lower Shotover Road and State Highway 6 and the paddocks on site. • In small fenced-off areas, including south-west of the dwelling and in the north-west corner of the eastern paddock. • Within the majority of the western paddock, parts of the central paddock and northern paddock, and around the margins of the eastern paddock. • In patches adjacent to the
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			12 Lower Shotover Road house driveway and around the containers and equipment in the south-west of the eastern paddock. The majority of the eastern paddock and parts of the central, western and northern paddocks was well maintained and therefore did not provide lizard habitat. No assessment can be made on the estimated number of skinks present without further surveys, which are scheduled for spring, 2026. However, the habitats present within the sites for this project are considered to be of overall low quality (lack of significant refugia, dense grassland, and highly fragmented), so are unlikely to support large numbers of skinks. A finer estimate on numbers anticipated to be impacted can be provided in the LMP following the lizard surveys. “
2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	FTAA-2607-1264 (Substantive Application, Section 10.5, page 146)	Addressed, as referenced and in the RFI response from the applicant (Appendix 3): “A full lizard survey is scheduled for spring 2026 and will confirm presence, abundance, and habitat use of species likely to be present at the site. However, please see the memoranda (Wildlands 2026a, 2026b) for more detail

			regarding our assessment of species potentially present. The species most likely to be present is the Not Threatened McCann's skink. Based on surveys in the surrounding area, it is possible, yet unlikely, that any At Risk or Threatened species are present. Pending survey results, potential impacts to Not Threatened species are expected to be limited to accidental injury/death/displacement, disturbance to lizards during earthworks, and loss of 3 indigenous lizard habitat. Effects to lizards will be managed through progressive habitat reduction, and standard best-practice salvage and relocation protocols. If higher-risk species are identified, additional effects management will be incorporated into the Lizard Management Plan that is currently being prepared."
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	FTAA-2607-1264 (Substantive Application, Section 10.6, page 147)	Addressed, as referenced and in the RFI response from the applicant (Appendix 3): "All methods proposed for survey, capture, handling, and relocation will follow DOC's Herpetofauna inventory and monitoring toolbox: Herpetofauna: Modules for

			biodiversity inventory and monitoring. The Lizard Management Plan will document these methods in detail and demonstrate alignment with DOC best practice. All other methods will follow standard practice used by Herpetologists for management of lizards including gradual vegetation reduction, and manual habitat removal."
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	FTAA-2607-1264 (Substantive Application, Section 10.7, page 147)	Addressed, as referenced and in the RFI response from the applicant (Appendix 3 – RFI response 1): "The authorised herpetologist will be suitably qualified as being trained and approved by the DOC lizard Technical Advisory Group and will be implementing lizard management at the site. Any lizards captured will be handled and held following best practice. All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers (to prevent accidental crushing), in full shade. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and prevent dehydration. An Incidental Discovery

			Protocol will be provided by the project herpetologist that outlines how contractors will safely, efficiently, and humanely catch and house any lizards found while herpetologist are not onsite." Appendix 3 – RFI response 2: "• Live-capture traps (a mix of pitfall and funnel traps) and manual handcapture will be used to capture lizards. Lizard trapping and capture will follow best practice as per the DOC Toolboxes for Herpetofauna. • If funnel traps are required to be used in areas of long grass, they will be checked twice daily, and an additional refuge will be placed inside the funnel trap to minimise mouse predation. Contingencies will be required for mouse predation events. • Any lizards captured will be handled and held following best practice and released as soon as practical to the pre-selected lizard release area. • All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers, in cool, full shade until release. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and
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			prevent dehydration. • Lizards will be released within six hours of capture into the preselected release area. • See Appendix 2 for the full Incidental Discovery Protocol.”
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	FTAA-2607-1264 (Substantive Application, Section 10.8, page 147)	Addressed, as referenced and in the RFI response from the applicant (Appendix 3): "The wildlife-related activities will occur within the development footprint at 12 Lower Shotover Road, Queenstown, and the pipeline along the Shotover River within the Kawarau River Marginal Strip, as shown on the submitted site plans, if the Lizard Survey results show lizards in this area. GPS coordinates and a map will be included in the Lizard Management Plan once survey transects and habitat polygons are finalised."
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	FTAA-2607-1264 (Substantive Application, Section 10.9, page 148)	Addressed, as stated by the applicant.
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity,	FTAA-2607-1264 (Substantive	Addressed, as stated by the applicant.

	including effects on the target species, other indigenous species, and the ecosystems at the site	Application, Section 10.10, page 149)	
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	FTAA-2607-1264 (Substantive Application, Section 10.11, page 152)	Addressed, as referenced, and in Appendix P (Lizard Habitat Assessment) and the RFI response (Appendix 3). Proposed salvage, including capture, handling and temporary holding, is also discussed at sections 10.6 and 10.9, and relocation is also discussed at section 10.9 of the Substantive Application. The Substantive Application and RFI response (Appendix 3 – responses 1 and 2) identify potential adverse effects on lizards and outline a framework of avoidance, minimisation, remediation and compensation measures. Prospective measures including surveys, Wildlife Act approvals, habitat reduction techniques, salvage and management planning are also provided. Further detail and final decisions regarding the specific avoidance, mitigation, offsetting and compensation measures that will be implemented, should lizards be present, will be in a future Lizard Management Plan.

			Full response to RFI 1 (Appendix 3): "The Lizard Management Plan will assess the effects on lizards at a local population scale, using the Quality Planning Extent of Adverse Effects criteria (Quality Planning, 2017). The effects on lizards will be managed via avoidance, remediation, minimisation, or compensation, in that order. Avoidance often involves avoiding lizard habitat where possible. Remediation often involves onsite restoration with lizard friendly planting, and the addition of habitat units for cover and retreats. Minimisation often involves a lizard salvage, or a form of managed habitat reduction. Compensation will only occur in order to address residual effects to lizard following lizard salvage, or if lizard salvage is not considered a viable option (due to practicality, number of lizards anticipated) or as a contingency built into the Lizard Management Plan, (i.e., to address impacts to At Risk or Threatened species, or if more lizards are discovered during salvage than expected). The Lizard Management Plan will be prepared following the principles outlined by the Department of Conservation (DOC) in
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			their guidelines (DOC 2019). These principles describe steps to take and enable the outcome of successful lizard management (including salvage, if determined to be the right mitigation option): Lizard species' values and site significance must be assessed at both the impact (development) and receiving sites. Actual and potential development-related effects and their significance must be assessed. Alternatives to moving lizards must be considered. Threatened species require more careful consideration than less-threatened species. Lizard salvage, transfer and release must use the best available methodology. Receiving sites and their carrying capacity must be suitable in the long term. Monitoring is required to evaluate the success of the salvage operation. Reporting is required to communicate outcomes of salvage operations and facilitate process improvements. Contingency actions are required when lizard salvage and transfer activities fail.” RFI response 2: “A lizard survey will be undertaken at the 12 Lower Shotover Road site (using Onduline Artificial Cover Objects or
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			funnel traps) and within the pipeline footprint outside of the Kawarau River marginal strip (using tracking tunnels). The survey will be undertaken during warm, calm weather conditions and is planned for spring (i.e. October 2026). • If lizards are present, potential adverse effects of the project on lizards are likely to include accidental injury/death/displacement of lizards within the development area, disturbance to lizards in surrounding areas from adjacent earthworks (e.g. from dust, vibration and noise), and lizard habitat loss and fragmentation. • Effects on lizards cannot be avoided due to lizard habitat being present within the planned development site. • Effects will be minimised by the implementation of a lizard salvage (using standard accepted methods) and progressive habitat reduction. • Lizards will be relocated to a pre-determined release site where appropriate habitat is present. Dependent on the site determined, enhancement may be required to increase lizard capacity long term. The potential release site is discussed in further detail in Appendix 1. • Where feasible, and guided by
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			detailed design, the development site will include lizard planting and habitat enhancement to remedy for the loss of lizard habitat. • Compensation for residual effects to lizards will be considered, as well as if only low numbers of lizards are detected during surveys (and lizard salvage is considered unfeasible).” Full response to RFI 2 is in Appendix 3.
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	FTAA-2607-1264 (Substantive Application, Section 10.12, page 152)	Addressed, as stated by the applicant.
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	FTAA-2607-1264 (Substantive Application, Section 10.12, page 152)	Addressed, as stated by the applicant.
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	FTAA-2607-1264 (Substantive Application, Section 10.13, page 152)	Addressed, as stated by the applicant.

2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	FTAA-2607-1264 (Substantive Application, Section 10.14, page 152)	Addressed, as stated by the applicant.
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Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. Consultation with Queenstown Lakes District Council and Otago Regional Council as the relevant consent authority for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)
- Certificate of compliance (section 42(4)(c) of the Act)

17 August 2026


Application Lead, Fast-Track Applications

File: FTSA2604
Your ref: FTAA-2607-1264

Tēnā koe Gabrielle,

Section 46 Completeness Check – Simplicity Living – Ladies Mile

Queenstown Lakes District Council (**QLDC, The Council**) has reviewed the submitted application material as it relates to the extent of the application within its jurisdiction.

QLDC considers the application may not pass the completeness test for the reason set out in this letter.

Fast-track Approvals Act 2024 (FTAA) Schedule 5 Clause 6

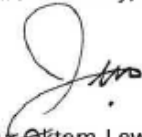
FTAA Section 42(3)(2)(a) requires an application for a resource consent to provide the information requirements set out in clauses 5-9 of Schedule 5. Schedule 5 Clause 6 requires the assessment of an activity's effect on the environment, including any actual and potential effects of the activity.

The Integrated Transport Assessment supporting the application and the Assessment of Environmental Effects does not undertake a full assessment of wider transport network impacts and performance in relation to additional demand on State Highway 6, in particular the Frankton Road/State Highway 6 intersection. Rather, the assessment focuses on immediate local effects up to and including the Shotover Bridge, and does not consider impacts further along the wider transport network.

QLDC considers that it is important that decision-makers are appraised with a full understanding of the effects of the proposal from additional traffic generation on the transport network.

QLDC considers that the application otherwise meets the requirements of Section 42 and 43.

Yours sincerely, Nāku noa nā,

A handwritten signature in black ink, appearing to read 'Onur Oktem-Lewis', with a stylized flourish at the end.

Onur Oktem-Lewis

Programme Manager, FTAA

Otago Regional Council
70 Stafford Street
Dunedin 9054

17 August 2026

Gabrielle Storey
Application Lead, Fast-Track Applications FTAA- 2607-1264
Uploaded via Fast Track Portal

Otago Regional Council has received correspondence dated 10 August 2026 from the EPA regarding a completeness and scope assessment prior to referral of a substantive application by Simplicity Living Limited for the Te Pūtahi Ladies Mile to an Expert Panel under the Fast-track Approvals Act 2024 (the Act).

Substantive Application Assessment

To inform the EPA's completeness assessment of the application, the EPA asked whether the documentation available in the application portal regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

ORC can confirm that the application documentation available in the EPA application portal meets the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Section 30 Confirmation

The EPA also asked the following specific question in accordance with section 30 of the Act:

- Confirm that the written notice prepared by the Council remains accurate and final at the time of receiving this letter.

I confirm that the letter dated 22 June 2026 regarding Section 30(3)b remains accurate and final.

Yours sincerely,



Alexandra King
Manager Consents/Manager Environmental Delivery Data and Systems

2. Consultation with the Department of Conservation as the administering agency for the following Acts:

- Concession that would otherwise be applied for under the Conservation Act 1987 (section 42(4)(e) of the Act)
- A wildlife approval as defined in clause 1 of schedule 7 of the Act (section 42(4)(h) of the Act)

Department of Conservation advice for EPA compliance assessment

Overview

Project name	Te Pūtahi Ladies Mile
Project applicant	Simplicity Living Limited
EPA unique ref. no	FTAA- 2607-1264
EPA Request Number	CRM_013901970
Conservation approvals sought	- Concession (as defined in clause 1 of Schedule 6 of the Act) (section 42(4)(e) of the Act) - Wildlife approval (as defined in clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)
EPA request summary	To inform the EPA's completeness assessment of the application, please provide DOC's views on whether the documentation provided by the EPA regarding the above approval/s, as provided by the applicant, meet the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail to satisfy the purpose for which it is required, in accordance with section 44 of the Act.
Date due to EPA	17/08/2016

On 10/08/2026 the Department of Conservation (DOC) received a request from the EPA seeking its views whether the application meets the requirements of sections 42 and 43 of the Fast-track Approvals Act 2024 (the Act) and whether the information is in sufficient detail to satisfy section 44 of the Act.

The purpose of this document is to provide advice to assist the EPA in making its decision whether the application lodged by Simplicity Living Limited on 10/08/2026 complies with the requirements of section 46(2) of the Act.

The advice covers compliance with the following:

- Information requirements for relevant approvals
- Consultation/notification requirements
- Further observations
- Further information recommended

The advice also includes further observations of relevance to further processing of the application, for example where further information could be needed for a decision by the panel.

DOC understands that this document will be passed on to the applicant, the Panel Convener and the Panel.

Compliance with information requirements

Approvals are sought for:

- Activities relating to lizards including capture, handling, relocation and liberation and incidental killing (of individuals unable to be salvaged).
- The creation of an easement to contain water infrastructure.

Our detailed assessment of the information requirements for the relevant approval is provided in the attached table. **In summary, DOC's advice is that the application does not fully meet the requirements of sections 42, 43, and 44 of the Act.**

The following information has not been provided;

- i. The applicant has not provided adequate evidence of the species present at the site through lizard surveys, or a Lizard Management Plan.

Further observations

In addition to the compliance requirements, DOC makes the following observations:

Adequate detail is provided in relation to the location and potential lizard values of the impact site only. The application does not adequately consider potential release sites for indigenous skinks. The Substantive Application makes several references to skinks potentially being salvaged and relocated if found but little information is provided on appropriate release sites and whether salvage is the best use of available mitigation resources. Although this information is likely to be explained further in the Lizard Management Plan (which is yet to be drafted) and will be informed by a lizard survey (which is yet to be completed), more information would still be valuable in this section in terms of how skinks will survive and establish following a salvage and relocation if retained onsite, as is alluded to in the application

On page 51 the Substantive Application states that *"Should salvage be required, lizards captured within the works area would be relocated to suitable habitat within the same property (where possible)"*. DOC considers that suitable habitats for indigenous skinks (where it can be guaranteed that they will survive and thrive after being relocated) are highly unlikely to be present within the immediate environs, and would require robust predator control methods. DOC is aware of a newly-built predator-proofed fenced area at Kelvin Heights – only 6 km from the project footprint. The applicant could consider this in their Lizard Management Plan.

Further information

DOC requests that the following further information be provided:

- i. In relation to the wildlife approval sought, a draft Lizard Management Plan providing additional detailed information to fully understand the actual and potential wildlife effects of the proposed activity and any methods to avoid and minimise those effects.

Applications for concessions

Clause 3 of Schedule 6 outlines the information required in an application for a concession.

Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete the guidance in this column and if appropriate add comment</i>
Clause 3(1) Schedule 6 - For the purposes of section 43(3)(e), an application for a concession must include the following information:				
<i>[Guidance note: For substantive applications for listed projects the information required in Clause 2 of Schedule 6 is required to be included but is covered by clause 3(1)(n)]</i>				
(a) a description of the proposed activity:	Y	Substantive Application, Section 9.2, page 135	Y	
(b) a description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places):	Y	Substantive Application, Section 9.2, page 136	Y	
(c) information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less:	Y	Substantive Application, Section 9.3, page 137	Y	

Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete the guidance in this column and if appropriate add comment</i>
in the case of an application for an approval within paragraph (a) of the definition of concession or paragraph (a) of the definition of Reserves Act approval, information about the extent to which the project is consistent with—				
(i) the relevant conservation management strategy and conservation management plan:	Y	Substantive Application, Section 9.4, Page 137	Y	
(ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity:	N/A	Substantive Application, Section 9.4, Page 137	N/A	No relevant CMS or CMP co-authored, authored or approved by a Treaty settlement entity that cover this area
(e) in the case of an application for an approval within paragraph (b) of the definition of Reserves Act approval, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977:	N/A	N/A	N/A	
(f) information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration:	Y	Substantive Application, Section 9.5, page 138	Y	
a description of—				
(i) the potential effects (positive and negative) of the proposed activity:	Y	Substantive Application, Section 9.6, page 139	Y	
Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete the guidance in this column and if appropriate add comment</i>
(ii) any actions that the applicant proposes to take to avoid, remedy, mitigate, offset, or compensate for any adverse effects of the proposed activity:	Y	Substantive Application, Section 9.6, page 139	Y	
(iii) details of the type of concession for which the applicant is applying:	Y	Substantive Application, Section 9.6, Page 139	Y	
a statement of—				
(i) the proposed duration of the concession; and	Y	Substantive Application, Section 9.7, Page 141	Y	The applicant is seeking a duration term for the “lifetime of the pipeline”. While this meets criteria of setting out a term of a concession, DOC notes that under the FTAA, a term of 30 years is the maximum possible outside of ‘exceptional circumstances’ in accordance with s17Z of the Conservation Act.
(ii) the reasons for the proposed duration:	Y	Substantive Application, Section 9.7, Page 141	Y	
(i) relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including	Y	Substantive Application,	Y	

Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete the guidance in this column and if appropriate add comment</i>
whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence or has any current criminal charges pending before a court):		Section 9.8, Page 142		
if the applicant applies for a lease, a licence granting an interest in land, or an easement,—				
(i) reasons for the request; and	Y	Substantive Application, Section 9.9, Page 142	Y	
(ii) sufficient information to satisfy the panel that, in terms of clause 7, it is appropriate under section 81 to grant the lease, licence, or easement (as the case may be):	Y	Substantive Application, Section 9.9, Page 142	Y	
(k) full details of any consultation undertaken with relevant iwi and with reserve owners and managers:	Y	Substantive Application, Section 9.10, Page 143	Y	
(l) information about financial and legal liabilities and obligations associated with the land:	Y	Substantive Application, Section 9.11, Page 143	Y	
(m) in the case of an application for an approval referred to in paragraph (b) of the definition of Reserves Act approval where the reserve is	N/A	Substantive Application,	N/A	

Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete the guidance in this column and if appropriate add comment</i>
owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve:		Section 9.12, Page 143		
(n) confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that right for the purposes of any lease proposed in the application if—	N/A	Substantive Application, Section 9.13, Page 143		
(i) the proposed lease would be for a term (including any renewals) that will, or is likely to, be more than 50 years; and			N/A	RFR is not triggered by an application for an easement (even if longer than 50 years)
(ii) the granting of the lease would trigger the right of first refusal or right of offer or return.				

Applications for wildlife approvals

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete this guidance and if appropriate add comment</i>
Schedule 7 clause 2(1) - For the purposes of section 43(3)(h), an application for a wildlife approval must include the following information:				
(a) specify the purpose of the proposed activity:	Y	Substantive Application, Section 10.2, page 145	Y	
(b) identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land):	Y	Substantive Application, Section 10.2, page 145	Y	
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Y	Substantive Application, section 10.3, page 145	Y	
(d) list protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted:	Y	Substantive Application, Section 10.4, page 146	Y	
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Y	Substantive Application, Section 10.5, page 146	N	Please refer to comments below.
Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete this guidance and if appropriate add comment</i>
(f) state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Y	Substantive Application, Section 10.6, page 147	N	Please refer to comments below.
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Y	Substantive Application, Section 10.7, page 147	N	Please refer to comments below.
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):	Y	Substantive Application, Section 10.8, page 147	N	Adequate detail is given on the location and potential lizard values of the impact site only and not any potential release sites for indigenous skinks. The Substantive Application makes several references to skinks potentially being salvaged and relocated if found (for example, pages 145, 147, 148, 150, 151) but little information is provided on appropriate release sites and whether salvage is the best use of available mitigation resources. Although this information is likely to be explained further in the Lizard Management Plan (which is yet to be drafted) and will be informed by a lizard survey (which is yet to be completed), more information

Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why]</i> <i>Delete this guidance and if appropriate add comment</i>
				would still be valuable in this section in terms of how skinks will survive and establish following a salvage and relocation. On page 51 the Substantive Application states that “<i>Should salvage be required, lizards captured within the works area would be relocated to suitable habitat within the same property (where possible)</i>”. In order for a release site to be suitable for salvaged indigenous skinks in New Zealand, it must have either no or very few mice, as mice are known to be a major predator, as well as available carrying capacity for new lizards, so that translocated skinks can survive and establish. DOC considers that suitable habitats for indigenous skinks (where it can be guaranteed that they will survive and thrive after being relocated) are highly unlikely to be present within the
Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why]</i> <i>Delete this guidance and if appropriate add comment</i>
				immediate environs, and would require robust predator control methods. DOC is aware of a newly-built predator-proofed fenced area at Kelvin Heights – only 6 km from the project footprint that the applicant could consider in their Lizard Management Plan.
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:	Y	Substantive Application, Section 10.9, page 148	Y	
(j) list all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site:	Y	Substantive Application, Section 10.10, page 149	Y	
(k) where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife):	N	Substantive Application, Section 10.11, page 152	N	Other than stating that a lizard survey will be undertaken in future of the entire site, and that a Lizard Management Plan <u>will be</u> (or is being) drafted, little detail is provided on how adverse effects on skinks will be avoided, minimised, mitigated, or compensated.

Relevant section	Is the information present? Y/N	Application document reference (include section/page reference)	Is the information provided in sufficient detail? Y/N	Comments <i>[If the information is not considered sufficient add a short statement why] Delete this guidance and if appropriate add comment</i>
(l) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953:	Y	Substantive Application, Section 10.12, page 152	Y	
(m) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court:	Y	Substantive Application, Section 10.12, page 152	Y	
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	Y	Substantive Application, Section 10.13, page 152 Appendix U	Y	
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Y	Substantive Application, Section 10.14, page 152	Y	

Appendix 3: Further information requests and responses

I sent a further information request to the applicant during under section 46(2B) of the Act. The request and response are set out below.

Request for Further Information 1:

- Date sent: 24 August 2026
- Topic: the height of apartment buildings, multiple clauses relating to the wildlife approvals, and the GPS location for a concession area.
- Date of response: 1 September 2026

Request for Further Information 2:

- Date sent: 3 September 2026
- Topic: Wildlife approval
- Date of response: 14 September 2026

Request 1:

Tēnā koe,

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

You lodged a substantive application, Simplicity Living - Te Pūtahi Ladies Mile, under the Fast-track Approvals Act 2024 (**the Act**) on 7 August 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To inform the EPA's assessment of the application for completeness, please provide a response to the following matters:

1. Eight storey apartment buildings:

The application proposal includes five to eight-level apartment blocks, described in section 3.3 of the Substantive Application. The referral proposal includes five to seven-level apartment buildings in section 3.1 of the Referral Assessment of Environmental Effects ([Referral AEE](#)).

In relation to the eight storey apartment buildings, please provide further information regarding any material differences, and any material differences in effects, between the proposal as described in the referral and in the application. Please include the number of apartment buildings that will be eight storeys. This information is requested to enable the EPA to assess the requirements under section 46(2)(b) of the Act.

2. Wildlife Approval

The following was raised as part of the mandatory consultation the EPA undertook with the Department of Conservation (DOC):

The applicant has not provided adequate evidence of the species present at the site through lizard surveys, or a Lizard Management Plan. ...

Adequate detail is provided in relation to the location and potential lizard values of the impact site only. The application does not adequately consider potential release sites for indigenous skinks. The Substantive Application makes several references to skinks potentially being salvaged and relocated if found but little information is provided on appropriate release sites and whether salvage is the best use of available mitigation resources. Although this information is likely to be explained further in the Lizard Management Plan (which is yet to be drafted) and will be informed by a lizard survey (which is yet to be completed), more information would still be valuable in this section in terms of how skinks will survive and establish following a salvage and relocation if retained onsite, as is alluded to in the application.

On page 51 the Substantive Application states that "Should salvage be required, lizards captured within the works area would be relocated to suitable habitat within the same property (where possible)". DOC considers that suitable habitats for indigenous skinks (where it can be guaranteed that they will survive and thrive after being relocated) are highly unlikely to be present within the immediate environs, and would require robust predator control methods. DOC is aware of a newly-built predator-proofed fenced area at Kelvin Heights – only 6 km from the project footprint. The applicant could consider this in their Lizard Management Plan.

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

- (a) Clause 2(1)(e): outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):
- (b) Clause 2(1)(f): state how the methods proposed to be used to conduct the actions specified under clause 2(1)(b) will ensure that best practice standards are met:
- (c) Clause 2(1)(g): describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:
- (d) Clause 2(1)(h): state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):
- (e) Clause 2(1)(k): where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife).

Additionally, there is no detail of the proposed release sites, which may be relevant if lizards are to be relocated. Please provide further information in this regard, where possible, as per clause 2(1)(b): identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land).

A list of predicted lizard species provided, but no details on the numbers present or impacted has been supplied. Please provide further information in this regard, where possible, as per clause 2(1)(d): List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted.

3. Location of the proposed activity

Schedule 6, clause 3(1)(b) requires: a description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places). In accordance with the requirements of clause 3(1)(b), please provide GPS co-ordinates where they are available.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 21 September 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 21 September 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

Applicant's Response 1:

File ref: FTAA-2607-1264

1 September 2026

Daya Thomson
Team Leader, Fast-track Applications
Environmental Protection Agency

Private Bag 63002
Wellington 6140
New Zealand

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

Dear Daya

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

Simplicity Living Limited (SLL) received a Request for Further Information from the Environmental Protection Agency (EPA) on 24 August 2026 to assist the EPA in determining whether the application is complete under section 46(2) of the Fast-Track Approvals Act 2024 (FTAA).

SLL appreciates the opportunity to provide additional detail and sets out the following information in response to the EPA's request.

1. Eight storey apartment buildings:

In relation to the eight storey apartment buildings, please provide further information regarding any material differences, and any material differences in effects, between the proposal as described in the referral and in the application. Please include the number of apartment buildings that will be eight storeys. This information is requested to enable the EPA to assess the requirements under section 46(2)(b) of the Act.

In relation to building height, SLL refers back to the Section 28 Notice of Decision that states:

- a) *approximately 1,100 residential units, across a mix of three storey walk-up apartments and five to seven storey apartment buildings*
- b) *community facilities, including community rooms, indoor recreation and family spaces, open spaces and parks, and onsite car parking (including in buildings)*

SLL confirms that one apartment building (Building 30, shown in Appendix C – Architectural Drawings) includes an eighth storey. The residential component of this building remains seven storeys, which is fully consistent with the referral order description of "residential units, across a mix of three storey walk-up apartments and five to seven storey apartment buildings" which is designed to hold approximately 1,100 residential units. The eighth storey does not contain any residential units; it accommodates communal facilities, which were expressly included in the

Figure 4 depicts Visual Simulation 06.

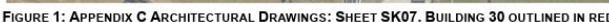




FIGURE 3: APPENDIX C ARCHITECTURAL DRAWINGS: SHEET SK51 BUILDING 30 ELEVATION



FIGURE 4: APPENDIX C ARCHITECTURAL DRAWINGS: SHEET SK35, BUILDING 30 OUTLINED IN RED

2. Wildlife Permit

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

Clause 2(1)(e): outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):

SLL's ecologists Wildlands have reviewed the request for further information and provided technical advice for the following response.

A full lizard survey is scheduled for spring 2026 and will confirm presence, abundance, and habitat use of species likely to be present at the site. However, please see the memoranda (Wildlands 2026a, 2026b) for more detail regarding our assessment of species potentially present. The species most likely to be present is the Not Threatened McCann's skink. Based on surveys in the surrounding area, it is possible, yet *unlikely*, that any At Risk or Threatened species are present.

Pending survey results, potential impacts to Not Threatened species are expected to be limited to accidental injury/death/displacement, disturbance to lizards during earthworks, and loss of

indigenous lizard habitat. Effects to lizards will be managed through progressive habitat reduction, and standard best-practice salvage and relocation protocols. If higher-risk species are identified, additional effects management will be incorporated into the Lizard Management Plan that is currently being prepared.

Clause 2(1)(f): state how the methods proposed to be used to conduct the actions specified under clause 2(1)(b) will ensure that best practice standards are met:

All methods proposed for survey, capture, handling, and relocation will follow DOC's Herpetofauna inventory and monitoring toolbox: [Herpetofauna: Modules for biodiversity inventory and monitoring](#)

The Lizard Management Plan will document these methods in detail and demonstrate alignment with DOC best practice. All other methods will follow standard practice used by Herpetologists for management of lizards including gradual vegetation reduction, and manual habitat removal.

Clause 2(1)(g): describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:

The authorised herpetologist will be suitably qualified as being trained and approved by the DOC Lizard Technical Advisory Group and will be implementing lizard management at the site.

Any lizards captured will be handled and held following best practice. All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers (to prevent accidental crushing), in full shade. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and prevent dehydration.

An Incidental Discovery Protocol will be provided by the project herpetologist that outlines how contractors will safely, efficiently, and humanely catch and house any lizards found while herpetologist are not onsite.

Clause 2(1)(h): state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):

The wildlife-related activities will occur within the development footprint at 12 Lower Shotover Road, Queenstown, and the pipeline along the Shotover River within the Kawarau River Marginal Strip, as shown on the submitted site plans, if the Lizard Survey results show lizards in this area. GPS coordinates and a map will be included in the Lizard Management Plan once survey transects and habitat polygons are finalised.

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

The Lizard Management Plan will assess the effects on lizards at a local population scale, using the Quality Planning Extent of Adverse Effects criteria (Quality Planning, 2017). The effects on lizards will be managed via avoidance, remediation, minimisation, or compensation, in that order.

- Avoidance often involves avoiding lizard habitat where possible.
- Remediation often involves onsite restoration with lizard friendly planting, and the addition of habitat units for cover and retreats.
- Minimisation often involves a lizard salvage, or a form of managed habitat reduction.
- Compensation will only occur in order to address residual effects to lizard following lizard salvage, or if lizard salvage is not considered a viable option (due to practicality, number of lizards anticipated) or as a contingency built into the Lizard Management Plan, (i.e., to address impacts to At Risk or Threatened species, or if more lizards are discovered during salvage than expected).

The Lizard Management Plan will be prepared following the principles outlined by the Department of Conservation (DOC) in their guidelines (DOC 2019). These principles describe steps to take and enable the outcome of successful lizard management (including salvage, if determined to be the right mitigation option):

- Lizard species' values and site significance must be assessed at both the impact (development) and receiving sites
- Actual and potential development-related effects and their significance must be assessed
- Alternatives to moving lizards must be considered
- Threatened species require more careful consideration than less-threatened species
- Lizard salvage, transfer and release must use the best available methodology
- Receiving sites and their carrying capacity must be suitable in the long term
- Monitoring is required to evaluate the success of the salvage operation
- Reporting is required to communicate outcomes of salvage operations and facilitate process improvements
- Contingency actions are required when lizard salvage and transfer activities fail

Additionally, there is no detail of the proposed release sites, which may be relevant if lizards are to be relocated. Please provide further information in this regard, where possible, as per clause 2(1)(b): identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land).

For both McCann's skink and Southern Grass skink, the use of the Kelvin Heights areas as a release site will be suitable. However, the carrying capacity of this proposed release site will need to be assessed in further detail once lizard surveys at the impact site determine the species presence and the population densities.

A list of predicted lizard species provided, but no details on the numbers present or impacted has been supplied. Please provide further information in this regard, where possible, as per clause 2(1)(d): List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted.

Two species of indigenous lizards may be present on site based on the location and habitat present (Table 1).

McCann's skink (Not Threatened) are likely to be present on site as this species is known to be widespread and abundant in the region, including in marginal habitats such as rank grassland in farmland and suburban areas, where the species can often be found at high densities.

Southern grass skink (At Risk – Declining) are possible, but unlikely, present, as they can also be found in rank grassland, but this species is patchily distributed and generally found at

significantly lower densities than McCann's skink in lowland areas around Queenstown and Central Otago.

Potential lizard habitats identified at 12 Lower Shotover Road include areas of rank grassland which are widely distributed across the site, including in the following areas:

- Along the Lower Shotover Road road margin, and between Lower Shotover Road and State Highway 6 and the paddocks on site.
- In small fenced-off areas, including south-west of the dwelling and in the north-west corner of the eastern paddock.
- Within the majority of the western paddock, parts of the central paddock and northern paddock, and around the margins of the eastern paddock.
- In patches adjacent to the 12 Lower Shotover Road house driveway and around the containers and equipment in the south-west of the eastern paddock.

The majority of the eastern paddock and parts of the central, western and northern paddocks was well maintained and therefore did not provide lizard habitat.

No assessment can be made on the estimated number of skinks present without further surveys, which are scheduled for spring, 2026. However, the habitats present within the sites for this project are considered to be of overall low quality (lack of significant refugia, dense grassland, and highly fragmented), so are unlikely to support large numbers of skinks. A finer estimate on numbers anticipated to be impacted can be provided in the LMP following the lizard surveys.

Table 1 – Potential lizard species present at the Te Pūhāhi Ladies Mile development area.

Species	Common Name	National Threat Status	Regional Threat Status	Habitat	Likelihood onsite
<i>Oligosoma maccanni</i>	McCann's skink	Not Threatened	Regionally Not Threatened	Rank grassland in farmland and suburban areas.	Highly likely
<i>Oligosoma chionocholes</i>	Southern grass skink	At Risk – Declining	Regionally Declining	Dense rank grassland	Possible

3. Location of the proposed activity – Concession Area

Schedule 6, clause 3(1)(b) requires: a description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places). In accordance with the requirements of clause 3(1)(b), please provide GPS co-ordinates where they are available.

The Site comprises the land subject to the approvals sought throughout this application. It includes the residential development area at 12 Lower Shotover Road, Queenstown (Lot 3 DP 606744, Lot 2 DP 617529 and Section 9 SO 485598), together with additional areas of legal road, and Crown land (marginal strip) required for the associated transport and three waters infrastructure upgrade works.



FIGURE 5: EXTENT OF SITE. SOURCE: GRIP MAPS.

SLL seeks a DOC concession on behalf of QLDC to construct, install, operate, maintain and access a new public water supply pipeline within the DOC-administered Kawarau River Marginal Strip. The pipeline forms part of the wider public water supply network required to service both the Project and the TPLM growth area.

The concession area is required over the marginal strip land adjacent to the Shotover River. The land Appellation is Crown Land Block III Shotover Survey District. The marginal strip is 19.8711 hectares in size, however the concession is only required over a portion of the northern section. The water supply pipeline will connect the Shotover Country Borefield to the existing QLDC water supply network. The pipe will follow legal road and pass through the marginal strip.



FIGURE 6: WATER SUPPLY PIPELINE SHOWN IN BLUE. GREY SHADING = ROAD RESERVE. YELLOW SHADING = MARGINAL STRIP SOURCE: GRIP

GPS co-ordinates are plotted along the pipeline as shown in Figure 7 below and are as follows:

428522.00, 814392.74

428543.85, 814332.45

428582.11, 814284.50

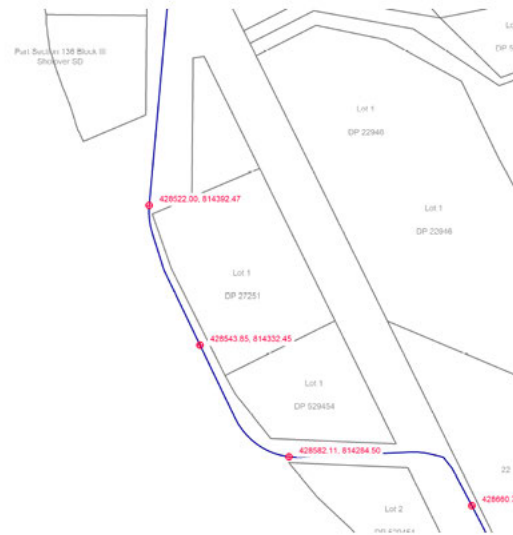


FIGURE 7: GPS CO-ORDINATES CONCESSION AREA

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

Yours sincerely

Request 2:

File ref: FTAA-2607-1264

3 September 2026

Shane Brealey
Simplicity Living Limited
C/- Joanne Skuse
By Email: [REDACTED]

Tēnā koe,

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

You lodged a substantive application, Simplicity Living - Te Pūtahi Ladies Mile, under the Fast-track Approvals Act 2024 (**the Act**) on 7 August 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To inform the EPA's assessment of the application for completeness, please provide a response to the following matters:

1. Wildlife Approval

The following was raised as part of the mandatory consultation the EPA undertook with the Department of Conservation (**DOC**):

The applicant has not provided adequate evidence of the species present at the site through lizard surveys, or a Lizard Management Plan.

Adequate detail is provided in relation to the location and potential lizard values of the impact site only. The application does not adequately consider potential release sites for indigenous skinks. The Substantive Application makes several references to skinks potentially being salvaged and relocated if found but little information is provided on appropriate release sites and whether salvage is the best use of available mitigation resources. Although this information is likely to be explained further in the Lizard Management Plan (which is yet to be drafted) and will be informed by a lizard survey (which is

yet to be completed), more information would still be valuable in this section in terms of how skinks will survive and establish following a salvage and relocation if retained onsite, as is alluded to in the application.

On page 51 the Substantive Application states that "Should salvage be required, lizards captured within the works area would be relocated to suitable habitat within the same property (where possible)". DOC considers that suitable habitats for indigenous skinks (where it can be guaranteed that they will survive and thrive after being relocated) are highly unlikely to be present within the immediate environs, and would require robust predator control methods. DOC is aware of a newly-built predator-proofed fenced area at Kelvin Heights – only 6 km from the project footprint. The applicant could consider this in their Lizard Management Plan.

DOC recommended that the following further information be provided:

In relation to the wildlife approval sought, a draft Lizard management Plan providing additional detailed information to fully understand the actual and potential wildlife effects of the proposed activity and any methods to avoid and minimise those effects.

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

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

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

Additionally, as it relates to Clause 2(1)(g) - describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes – please describe the methods to be used for the Incidental Discovery Protocol. Specifically, how contractors will safely, efficiently, and humanely catch and house any lizards found while herpetologists are not on site.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 1 October 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 1 October 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

If you have any questions, please contact [REDACTED], Application Lead by email at info@fasttrack.govt.nz.

Nāku noa, nā

Applicant's Response 2:



The Property Group Limited
Queenstown Office

PO Box 349 Queenstown 9348
Level 3 / Five Mile Centre, 36 Grant Road,
Frankton, Queenstown 9371

File ref: FTAA-2607-1264

14 September 2026

Ben Bond
Team Leader, Fast-track Applications
Environmental Protection Agency

Private Bag 63002
Wellington 6140
New Zealand

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

Dear Ben

[Request for further information in relation to your application under the Fast-track Approvals Act 2024](#)

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

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

1. Wildlife Approval

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,



Jo Skuse
Principal Planner



Attachment A: Wildlands Memorandum, dated 14 September 2026

Our Ref: 8026d

14 September 2026

Ben Bond (EPA Team Leader, Fast-track Applications)
Environmental Protection Authority
By email: projects@fasttrack.govt.nz

Dear Ben

FTAA-2607-1264 SIMPLICITY LIVING – TE PŪTAHI LADIES MILE: PROPOSED LIZARD MANAGEMENT

INTRODUCTION

Simplicity Living Ltd has submitted a substantive application under the Fast Track Approvals Act (2024) for the 'Te Pūtahi Ladies Mile' urban development at 12 Lower Shotover Road, Queenstown. The construction of a water pipeline is also included in the planned development, close to Old School Road, Twin Rivers Trail, and adjacent private properties along the true left of the Shotover River. The pipeline footprint is proposed to go through a section of the Department of Conservation (DOC) 'Marginal Strip – Kāwarau River' protected area (hereafter referred to as the Kāwarau River marginal strip) close to the Shotover River.

The Environmental Protection Authority (EPA) have issued Simplicity Living Ltd with a Request for Further Information (RFI) regarding the lizard management proposed to be undertaken to address adverse effects on lizards from the planned development. Simplicity Living Ltd has requested that Wildlands provide comments in response to the requests from the EPA in their RFI (Table 1).

This letter forms our response to the above requests and includes draft assessment details and management actions that are proposed to be included within the LMP for the Te Pūtahi Ladies Mile development. Note that the proposed management details are in draft form and may change in the final LMP (e.g., dependent on the results of the lizard survey). Appendix 1 includes a brief template of lizard management actions to be included within the LMP.

The following comments have been made by the EPA:

Table 1 – EPA Request for Further Information and Wildland Consultants' response.

EPA RFI Comments	Wildlands' Response
a) Clause 2(1)(k): where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address	- A lizard survey will be undertaken at the 12 Lower Shotover Road site (using Onduline Artificial Cover Objects or funnel traps) and within the pipeline footprint outside of the Kāwarau River marginal strip (using tracking tunnels). The survey will be undertaken during warm, calm weather conditions and is planned for spring (i.e. October 2026). - If lizards are present, potential adverse effects of the project on lizards are likely to include accidental injury/death/displacement of lizards within the development area, disturbance to lizards in

EPA RFI Comments	Wildlands' Response
unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife).	surrounding areas from adjacent earthworks (e.g. from dust, vibration and noise), and lizard habitat loss and fragmentation. • Effects on lizards cannot be avoided due to lizard habitat being present within the planned development site. • Effects will be minimised by the implementation of a lizard salvage (using standard accepted methods) and progressive habitat reduction. • Lizards will be relocated to a pre-determined release site where appropriate habitat is present. Dependent on the site determined, enhancement may be required to increase lizard capacity long term. The potential release site is discussed in further detail in Appendix 1. • Where feasible, and guided by detailed design, the development site will include lizard planting and habitat enhancement to remedy for the loss of lizard habitat. • Compensation for residual effects to lizards will be considered, as well as if only low numbers of lizards are detected during surveys (and lizard salvage is considered unfeasible).
b) Clause 2(1)(g): describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes – please describe the methods to be used for the Incidental Discovery Protocol. Specifically, how contractors will safely, efficiently, and humanely catch and house any lizards found while herpetologists are not on site.	• Live-capture traps (a mix of pitfall and funnel traps) and manual hand-capture will be used to capture lizards. Lizard trapping and capture will follow best practice as per the DOC Toolboxes for Herpetofauna. • If funnel traps are required to be used in areas of long grass, they will be checked twice daily, and an additional refuge will be placed inside the funnel trap to minimise mouse predation. Contingencies will be required for mouse predation events. • Any lizards captured will be handled and held following best practice and released as soon as practical to the pre-selected lizard release area. • All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers, in cool, full shade until release. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and prevent dehydration. • Lizards will be released within six hours of capture into the pre-selected release area. • See Appendix 2 for the full Incidental Discovery Protocol.

PLANNED LIZARD SURVEY

Overview

A lizard survey will be completed in spring (planned for October 2026, during appropriate weather conditions).

Survey methods

Within 12 Lower Shotover Road, Onduline Artificial Cover Objects (ACOs) or funnel traps will be installed on-site and checked daily over a minimum of three days by a suitably qualified herpetologist. If ACOs are used, ACOs will be left in place undisturbed for a minimum of two weeks until the lizard survey is undertaken. Systematic searches of lizard habitat (e.g. checking under debris) will also be undertaken during the survey period.

A lizard survey of the pipeline footprint outside of the Kwarau River marginal strip will be undertaken using tracking tunnels. Tracking tunnels will be left in place for a minimum of two weeks.

Appendix 1

DRAFT LIZARD MANAGEMENT (TO BE CONFIRMED FOLLOWING LIZARD SURVEY)

Avoidance

Avoidance of lizards and their habitats at the site is not possible. The entire site will be earth worked to prepare for the development. As areas of potential lizard habitat can be found widely throughout the site, avoidance is not possible.

Minimisation – progressive habitat reduction

Progressive habitat reduction will be undertaken in areas of potential lizard habitat and confirmed lizard habitat (to be confirmed following the lizard survey) within the pipeline footprint as described in Section 4.4.1 of the Lizard Habitat Assessment for the Kawarau River marginal strip (Wildlands 2026a).

Progressive habitat reduction will be undertaken during the lizard active season (October-March inclusive) during warm, calm weather conditions when lizards are active.

Minimisation – lizard salvage and release

If ≥ 10 individual 'Not Threatened' lizards or any 'At Risk' lizards are detected during the upcoming lizard survey, a lizard salvage will be undertaken. If between 1–9 'Not Threatened' lizards are found, then a lizard salvage may not be undertaken, and compensation will be provided instead in this case. The Project Herpetologist will determine whether a lizard salvage is appropriate if between 1–9 'Not Threatened' lizards are found (i.e. if nine lizards are found in a small area it will likely be appropriate to do a targeted salvage of that area).

The salvage and relocation programme will be implemented prior to vegetation clearance/earthworks occurring on site within all impact areas where lizards are detected during the survey or are reasonably considered to be present following the survey. All lizards will be trapped using live capture traps and will be relocated to the proposed release site.

Salvage methods

- Live-capture lizard traps will be placed at 5–10-metre spacings in areas of lizard habitat.
- Traps used will be a mix of pitfall and funnel traps. The use of these traps will follow best practice as per the DOC Herpetofauna Toolboxes for Pitfall Trapping (Hare 2012a) and Funnel Trapping (Hare 2012b).
- All live capture traps will be baited with known lizard attractants and padded with grass, and a damp sponge will be added to pitfall traps.
- If funnel traps are required to be used in areas of long grass, they will be checked twice daily, and an additional refuge will be placed inside the funnel trap to minimise mouse predation. Funnel trapping will be stopped if mouse predation occurs.

- Hand-searching techniques will be used to capture additional basking/active skinks. This will involve manually searching through and deconstructing debris piles (where possible).
- Any lizards captured will be handled and held following best practice and released as soon as practical to the pre-selected lizard release area.

Salvage length

The minimum length of the lizard salvage will depend on the abundance of lizards found during the lizard survey (Table 2).

The lizard salvage will be considered completed in each habitat area:

- When there are no skinks captured after the 'Minimum No. of Salvage Days'.
- When trapping reveals trends of decreasing numbers of skinks over the course of the 'Approx. No. of Salvage Days'.

If live capture traps continue to get the same or high numbers of skinks past the 'Approx. No. of Salvage Days' (>3 'Not Threatened' individuals per day or one 'At Risk' individual), then trapping will continue for three-day increments until no more skinks are caught or <3 'Not Threatened' individuals or no 'At Risk' individuals are caught on any one day after the 'Approx. No. of Salvage Days'¹.

Table 2 – The minimum number of lizard salvage days based on the number of lizards found during the upcoming lizard survey.

No. of Lizards Found During Survey	Minimum No. of Salvage Days	Approx. No. of Salvage Days
10–30	5 days	7 days
>30	7 days	10 days

Temporary holding of lizards

All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers (to prevent accidental crushing), in cool, full shade until release. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and prevent dehydration. Lizards will be released within six hours of capture into the pre-selected release area.

Lizard release area

Overview

The lizard release site is proposed to be created within a protected reserve in the Queenstown area. Permissions to use a specific reserve are being sought. Lake Hayes Wildlife Refuge (Protected Area ID 2804479) is the primary reserve currently being investigated to use as a release site. An appropriate lizard release site will be confirmed prior to undertaking any lizard salvage.

¹ The length of trapping past the minimum requirements will ultimately be up to the discretion of the Project Herpetologist.

Due to the control of predators within a predator-proofed fenced area, the Whakatipu Lizard Sanctuary located at Kelvin Heights may already be at or close to carrying capacity for McCann's skinks and is therefore unlikely to be appropriate for releasing a large number of lizards. Additionally, there may be genetic issues in relocating lizards to the opposite side of the Kawarau River, which forms a significant geographical barrier for natural lizard dispersal.

Release methods

Skinks will be transported by car to the release site. The hard-sided containers that skinks are temporarily held in will be placed in larger bins (fish bins) securely in the car (seat-belted), so movement is limited. Lizards will be checked on release for any signs of stress or illness.

Lizards will be released into pre-constructed habitat units (rock or wood piles) or dense ground cover vegetation. To minimise competition, between 10–20 skinks (depending on the numbers caught) will be released into each habitat unit, or if released into dense vegetation individual lizards will be released at least five metres from each other. Where any lizards are found together or in an aggregation (i.e. multiple captures in one trap), they will be released in groups together.

Proposed release site creation and enhancement

The proposed habitat creation and enhancement described below will provide protective benefit to the lizards proposed to be salvaged from the development site. Proposed release site creation and enhancement includes pest plant control, enhancement planting and plant maintenance, and the construction of additional habitat units. The final habitat creation and enhancement to be undertaken will be determined through consultation between the Project Herpetologist, Simplicity Living Ltd and the release site landowner once a release site has been confirmed.

Pest plants: Initial weed/pest plant control will occur prior to the lizard release. Control will focus on any woody and herbaceous weeds to reduce their abundance within the site and preserve current lizard habitat values (i.e. rank grass). Pest plant control will be implemented in order to have minimal disturbance to resident lizards, including using manual control or targeted spot-spraying instead of aerial spraying.

Enhancement planting: Lizard-friendly plants (tussocks and low-growing shrubs that will provide dense ground cover vegetation) will be planted within the release area. These plantings will be appropriate for the release site location.

Pest plant and enhancement planting monitoring and maintenance: Ongoing maintenance and monitoring of the enhancement plantings will be undertaken to ensure the successful establishment of plantings. Planting will be followed by monitoring visits two to three times a year for at least the first three years to ensure the uptake and survival of plantings and to undertake pest plant control.

Additional habitat units: To increase the amount of suitable lizard habitat, provide additional shelter and protection from predators, and increase carrying capacity within the site, the release site will also be enhanced through the deposition of wood and/or rock piles. The placement of the wood/rock piles will be supervised by the Project Herpetologist to ensure they are placed correctly and that disturbance to the site is minimised. Additional habitat units will be installed prior to the release of lizards.

Remediation

Lizard-friendly plantings

While the majority of the site will be developed, there are sections that will be created as green spaces. Lizard-friendly plants will be planted in these areas where possible. Specific remediation planting will be determined in consultation between the Project Herpetologist and Simplicity Living Ltd.

Compensation

If between 1–9 skins are found during the lizard survey and a lizard salvage is not undertaken, \$5,000 funding will be provided for lizard research. Funding will be provided to the Society for Research of Amphibians and Reptiles (SRARNZ) or another suitable recipient as determined in consultation with DOC.

REFERENCES

- Hare, K. (2012a). *Department of Conservation inventory and monitoring toolbox: Herpetofauna: Pitfall trapping*. Department of Conservation. DOCDM-760240.
- Hare, K. (2012b). *Department of Conservation inventory and monitoring toolbox: Herpetofauna: Funnel trapping*. Department of Conservation. DOCDM-783609.
- Hitchmough, R., Barr, B., Knox, C., Lettink, M., Monks, J. M., Patterson, G. B., Reardon, J. T., van Winkel, D., Mekan, T., & Michel, P. (2026). *Conservation status of reptiles in Aotearoa New Zealand, 2025*. New Zealand Threat Classification Series 50. Department of Conservation, Wellington.
- Jarvie, S., Campbell, C., Knox, C., Monks, J., Purdie, S., & Reardon, J. (2025) *Conservation status of reptile species in Otago, 2025*. April 2025 – Otago Threat Classification Series 11. Otago Regional Council.
- Wildland Consultants Ltd. (2026a). *Lizard habitat assessment at the Kawareau River marginal strip, Queenstown*. Wildland Consultants Contract Report No. 8026. Prepared for Simplicity Living Ltd. 6pp.
- Wildland Consultants Ltd. (2026b). *Lizard habitat assessment at the Te Pūtahi Ladies Mile development*. Wildland Consultants Contract Report No. 8026b. Prepared for Simplicity Living Ltd. 6pp.

Appendix 2

INCIDENTAL DISCOVERY PROTOCOL

Overview

Incidental discovery protocols are set out below for contractors working on site and are to be followed if any lizards are discovered, post-mitigation, during development works.

Where lizards might be found

Lizards could be present amongst vegetation such as rank grass or garden plantings or under pieces of debris (e.g. bits of wood). They may also bask in sunny exposed spots, such as in/on debris piles. They may be uncovered when disturbed by habitat clearance or earthworks.

Following the incidental discovery of a lizard

Immediately (as soon as discovery of a lizard is made) cease any activities within 20 metres of the place of discovery. If the species encountered is a species with a Threat Classification status of 'Threatened' then all works must cease immediately, until an assessment is made of the works programme risk for that species, and any specific management identified, including avoidance.

If possible and safe to do so, the personnel present on site should capture the lizard by hand and place it in a container with grass/leaf litter. If lizard handling is required, handle lizards as gently as possible, keep handling to a minimum, and avoid handling the tail or head of the lizard to avoid causing injury to the lizard. Ensure to create breathing holes in the container for the lizard. Hold in captivity in a **cool, shady** location out of sun until a decision is made.

Immediately inform the Project Herpetologist and Operations Manager on site. The Project Herpetologist will advise on next steps, including where to release lizards.

Document:

- Date and time.
- Weather conditions.
- Observer name(s).
- Photographs of the animal and the location where it was found. Photograph the lizard from above trying to show the head and any markings on the upper body or back. A cell-phone picture is adequate for this and will help with identification of species.
- Location (GPS coordinates).
- Species.
- If injured:
 - What part of the animal is injured? (Photograph the injury.)
 - Time since injury (if known).
 - Probable cause of injury (if known).
 - Immediately (within one hour) contact a local veterinarian and the local DOC office and arrange for the injured lizard to be delivered to the veterinarian. This may require a monetary contribution for care.
- If a carcass is found:
 - Condition of carcass (see below).
 - Approximate time since death (if known).
 - Probable cause of death (if known).
 - Notify the Project Herpetologist at Wildland Consultants immediately. The Project Herpetologist will notify DOC and ask for advice on how to proceed.
 - Arrange for the carcass to be sent to Wildbase (06 350 5329), Massey University, in Palmerston North, unless advised otherwise by DOC.
 - If lizards are unable to be captured and/or photographed, note as much detail as possible: what colour was it; what colour patterns; how big was it; whether it was robust or slender; what habitat was it found in? You may need to describe these details to the Project Herpetologist and DOC.

Should a nationally 'Threatened' lizard species be encountered during construction, the Project Herpetologist will immediately consult with DOC to ask for advice on how to proceed. Further works may not proceed until approval has been granted to continue by the Project Herpetologist and DOC.