

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Ridgeburn Project
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Otago Regional Council		
*First name	Joanna		
*Last name	Gilroy		
Postal address	70 Stafford Street Private Bag 1954 Dunedin 9054		
*Contact phone number	s 9(2)(a)	Alternative	0800 474 082
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Thank you for your invitation to provide written comments on the application for referral of the Ridgeburn Project under the Fast-track Approvals Act 2024. This application was reviewed by elected members delegated to participate in the fast-track process and teams across the Otago Regional Council (Council). Please see below comments on this application.

Query 1 - Competing Applications

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.

Response:

There are no competing applications.

Query 2 – Existing Resource Consents

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.

Response:

165ZI: There are no such consents.

124C(1)(c): There are no such consents.

Other Matters

Council held a pre-application meeting with the Applicant regarding the proposed activity on 8 May 2025. The meeting minutes for the meeting dated 20 May 2025 are attached as Appendix 1. The details of the meeting minutes are not replicated in this letter and this letter should be read in conjunction with the minutes. As noted in the minutes, the information provided to Council at the pre-application stage was limited and although we have provided as much useful feedback as possible, it is reflective of the available information.

We also wish to provide additional comments and reiterate key points, as follows;

Transport Matters

- A route change was implemented on Route 2 on 30 June 2025. The route now terminates Frankton Hub. We would advise amending Figure 2 in the Transport Assessment (Appendix 10) to reflect this change. View the updated route on our website: <https://www.orc.govt.nz/media/110o45a5/qt-a2-map-timetable-july-2025.pdf>
- ORC is not planning to extend public transport services on State Highway 6 east of Arrowtown-Lake Hayes Road or introduce an "Orbital Bus Service", unlike what is stated in the Transport Assessment (p. 2-3) and the Ridgeburn Design Document (Appendix 15a).
- The non-linear street networks, low-density development, and significant travel distance to most employment, educational, medical and shopping opportunities would not incentivise active or public transport use. As a result, Ridgeburn residents without access to private vehicles would be challenged to meet their transport needs.
- This proposed design does not meet ORC's urban form and transport design criteria of high proximity, linearity, connectivity and density required to "provide public transport services sufficient to enable well-functioning urban environments" as per the Otago Regional Public

Transport Plan 2025-2035. In alignment with the plan, we would not commit to servicing Ridgeburn with public transport.

- As a result of the above factors, Ridgeburn residents could be expected to generate a significant number of private vehicle trips. We consider that few of these trips would be catered for by existing or planned public transport. This would have adverse impacts on the Whakatipu Basin's traffic congestion and greenhouse gas emissions.
- Prior to lodging a substantive application, we would strongly advise that an integrated transport assessment is undertaken to determine the proposed development's overall viability within the Queenstown transport network.
- The lack of detail on key infrastructure raises concerns about long-term costs to ratepayers if retrofits are required, particularly for three waters and public/active transport infrastructure. Roads should be future-proofed to accommodate public and active transport.
- The development does not align well with established urban form principles. Strong mitigation measures will be required, particularly ensuring future-proofed transport and reliable infrastructure.
- Public and active transport connections should be integrated into design from the outset.
- The Regional Public Transport Plan (RPTP) sets aspirational targets for regional connectivity, including Alexandra–Cromwell–Queenstown. The Application should have regard to this.

Freshwater Matters

- Arsenic in groundwater is a known issue in the Wakatipu Basin. The applicant should regularly test proposed drinking water bores through different seasons to assess potential arsenic levels and risk.
- There is likely to be limited groundwater quantities at the development site unless bores are located down in the Kawarau River floodplain area.
- The proposed disposal field is on a terrace adjacent to the Kawarau River. There needs to be sufficient separation between any groundwater takes and the disposal field. There are potential issues with ground-based disposal field so close to the river. Additionally, small, bespoke wastewater systems are often unreliable in achieving long-term high-quality discharges, for instance, insufficient inputs can cause operational issues. The lack of information on wastewater treatment, disposal fields, and drinking water supply makes it difficult to assess risk, including potential impacts on groundwater and drinking water.
- There are potential wetlands present in the development area. Existing ecological values, including wetlands, need proper assessment across the site.
- Proposed revegetation and pest control initiatives lack detail. Successful outcomes depend on a robust ecological restoration plan, including appropriate species selection, watering, and ongoing pest control.

- An expectation is a full ecological assessment would be completed by a suitably qualified expert on the species and ecosystems in the area before the proposed project commences. Given its location, threatened or at-risk plants and animals, as well as rare ecosystems, could be impacted by the proposed project. Likely high ecosystem values on the hill - plans indicate this will not be developed.
- The Application should consider the opportunity for green infrastructure, including stormwater reuse for non-potable purposes, to reduce runoff and support environmental outcomes.

Air Quality

- Council is supportive of the inclusion and promotion of heat pumps as the primary heat source.

Natural Hazard Matters

- There is a flood risk from the Kawarau to any infrastructure adjacent to the river.
- There is a potential rockfall/landslide risk from outcrops on the hill adjacent to the development.
- Unmapped mine workings could be present near the development. Historic underground mining activity is usually found at the schist bedrock/gravel interface.
- No hazards assessment has been undertaken. Flooding and potential landslide risks must be properly considered, with infrastructure located outside high-risk areas.

Compliance Matters

- The Compliance Team have requested greater certainty as to how the activity would be undertaken and wish to stress the importance of specific, enforceable consent conditions to avoid adverse effects.
- Council can comment on the compliance history of the applicant as required.

Appendix 1: RM25.188 Pre-application letter 20 May 2025

File: RM25.188

Date: 20 May 2025

Sent via email: s 9(2)(a)
s 9(2)(a)

Dear Simone,

Pre-Application Meeting Follow up

Thank you for attending a pre-application meeting with the following Otago Regional Council (ORC) staff:

Mat Bell - Team Leader Consents
Martina Courtier – Fast-track Consents Planner
Melanie Heather - Principal Compliance Specialist
Chris McSweeney - Team Leader Compliance
Ben Mackey - Manager of Science
Grace Longson - Transport Planner

This letter summarises our advice based on the information presented by you at the meeting held on 8 May 2025 and information provided in an email from you dated 12 May 2025 (after ORC requested further proposal information). As communicated to you, the information provided about the proposal has been limited and although we have provided as much useful feedback as possible, it is reflective of the available information.

Background

From documentation and discussions, we understand the key aspects of the project are as follows:

- Gibbons Co shortly intend to submit a referral application to the EPA for their Ridgeburn project.
- This development would comprise of:
 - Up to 1,242 new dwellings, 180 of which will be priced between \$599,000 and \$999,000.
 - Restoration of Morven Hill and adjacent escarpment, involving the planting of approximately 150,000 natives over 58.8 ha, plus 38.5 ha of targeted weed and pest control to enhance skink populations.
 - Mixed-use commercial precinct located on Morven Ferry Road with a community hub, supermarket, daycare and retail.
 - Private wastewater treatment plant, with potential for water recycling or reclamation systems. Design also allows for future public connections. Treated effluent will be discharged to land via a disposal field situated on the flat terrace

adjacent to the river. The field is located approximately 15 metres vertically and 150 metres horizontally from the Kawarau River.

- Three natural inland wetlands have been identified on site by the project ecologist. The applicant plans to avoid any reclamation or modification of these wetlands.
- Initial geotechnical investigations have been undertaken. During this work no obvious indicators of contamination were discovered. A detailed contamination assessment will be completed as part of the substantive application.
- Heat pumps have been confirmed as the primary heating source.
- Affordable solar panels to be offered as an optional add-on for future homeowners.

Otago Regional Council Comments and Feedback

Transport

Current and planned public transport routes

The ORC and QLDC currently do not have plans to implement a public transport service on State Highway 6 east of Lake Hayes or on McDonnell Road, where the Ridgeburn Strategic Plan map currently displays a 'proposed orbital bus route'. All current and planned public transport services east of Lake Hayes use Arrowtown-Lake Hayes Road or Malaghans Road. Due to there being no current or planned public transport using State Highway 6 at Morven Ferry Road, the proposed development site would not be as proximate to current or planned public transport routes as potentially assumed. Please consult the latest current and planned network maps in the below documents:

- Current Queenstown public transport routes [orbus-queenstown-total-routes-map-september-2023.pdf](#).
- QLDC Spatial Plan's future public transport network map: [the-spatial-plan a4-booklet jul21-final-web-for-desktop.pdf](#) (p. 88).
- Proposed Queenstown public transport network aspirations: [pt-rptp-report-document-a4-mar-2025-web-2.pdf](#) (p. 63-64).

Urban form

We have concern about the private vehicle-reliant design of the proposed Ridgeburn development. The non-linear street networks, low-density development, and significant travel distance to most employment, educational, medical and shopping opportunities would not incentivise active or public transport use. As a result, Ridgeburn residents without access to private vehicles would be challenged to meet their transport needs.

Due to the urban form not being conducive to active transport, particularly for trips outside the development, the connectivity to the Twin Rivers and Arrow River Bridges Trails could be undermined.

Potential for public transport service provision

This proposed design does not meet ORC's proposed urban form and transport design criteria of high proximity, linearity, connectivity and density required to "provide public transport services sufficient to enable well-functioning urban environments" as per the draft Regional Public Transport Plan 2025-2035 (p. 46). In alignment with the plan, we would not commit to servicing Ridgeburn with public transport.

The potential for an effective park-and-ride connection would require greater study. Due to the closest public transport service to the development site being located at the SH6/Arrowtown-Lake Hayes Road intersection, over 3km away, it may not experience the desired uptake by Ridgeburn residents.

Impact on road network

As a result of the above factors, Ridgeburn residents could be expected to generate a significant number of private vehicle trips. We consider that few of these trips would be catered for by existing or planned public transport. This would have adverse impacts on the Whakatipu Basin's traffic congestion and greenhouse gas emissions.

Prior to lodging a substantive application, we would strongly advise that an integrated transport assessment is undertaken to determine the proposed development's overall viability within the Queenstown transport network.

Resource Consents and Compliance

The following comments outline key issues to address, prior to lodgement with the EPA and some other important observations.

Bore / Groundwater Water Take

- It is likely that a land use consent and water permit for this activity is required.
- Water supply for the development is to come from bores sourcing groundwater onsite. There are rules in the Regional Plan: Water for Otago (RPW) with regard to constructing bores and also abstracting groundwater.
- If the water is planned to be abstracted from an existing bore, we recommend confirming whether the bore has an ORC land use consent and provide the bore/well number in the application. If there is no existing consented bore, a land use consent will be required.
- If the taking of water from the bore cannot meet the permitted activity rules of the RPW, a resource consent is needed for abstracting the water.
- Arsenic in groundwater is a known issue in the Wakatipu Basin. The applicant should plan to regularly test proposed drinking water bores through different seasons to assess potential arsenic levels and risk.
- Please also ensure the bore head design includes suitable sealing and backflow prevention.

Contaminated land

- A Detailed Site Investigation (DSI) may be required due to historic rural land use.
- If contamination is identified, consent may be required under The Regional Plan: Waste for Otago (RPWa) and the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 for disturbance or remediation.
- The disturbance of a contaminated suite requires consent under the Regional Plan Waste (RPWa). A contaminated site is defined under the RPWa as “a site at which hazardous substances occur at concentrations above background levels **and** where assessment indicates it poses, or is likely to pose an immediate or long term hazard to human health or the environment.”
Both parts of this definition must be satisfied in order for the definition to apply. There are some sites in Otago with naturally occurring levels of substances which may exceed

soil guideline values (indicating a hazard to human health or the environment), but these will not meet the contaminated site definition because the substance does not also occur at concentrations about background levels.

- There is no permitted activity rule for the disturbance of a contaminated site and so any disturbance that is beyond de minimus will require a consent as a discretionary activity in accordance with Rule 5.6.1 of the RPWa. In general, very small-scale disturbance through activities such as sampling surface soils and hand auger sampling would be considered de minimus, whereas larger scale works such as excavation and earthworks will require a consent.

Wastewater

- The RPW has rules with regard to the discharge of treated wastewater to land. You noted that wastewater is likely to be treated and discharge to land on a site adjacent the Kawarau River. A discharge permit for this activity will likely be required with a maintenance and monitoring plan, and regular assessments by a Suitably Qualified and Experienced Person (SQEP).
- Please provide the following information in your application:
 - Details on the design and capacity of the wastewater system, including whether reserve land has been allocated for future expansion.
 - Specify the disposal method (e.g., cut and carry, land treatment, disposal field), supported by soil and permeability testing.
 - Clearly define the location of discharge, and assess:
 - Feasibility
 - Groundwater interaction
 - Proximity to water bodies, buildings, and property boundaries
 - Cumulative effects (e.g., nearby septic systems)
 - Confirm whether wastewater reuse is proposed.
 - Outline proposed discharge limits, with consideration to performance during cold weather.

Residential earthworks

- There are rules in the RPW that apply to earthworks for residential development. The provisions have been developed to manage the discharge of sediment from earthworks resulting in adverse effects on water quality. Rules 14.5.1.1 and 14.5.2.1 set out the specific requirements for earthworks. You will need a resource consent if you cannot meet all the below criteria:
 - The area of exposed earth is no larger than 2,500m² per landholding in any consecutive 12-month period;
 - Works are not within ten metres of a water body (such as a river, stream, wetland or lake), drain, water race or the coast;
 - Exposed earth is stabilised when works are completed;
 - Works are not on (potentially) contaminated land;
 - Soils and debris are not placed where sediment can enter waterways or the coastal marine area;
 - Works will not result in flooding, erosion, land instability, subsidence or property damage; and
 - Discharge of sediment to water will not result in, e.g. any conspicuous change in the colour or visual clarity, objectionable odour, making water not suitable for farm animals, or cause significant adverse effects on aquatic life.

- If you cannot meet one or more of these criteria, you will need both a land use consent and a discharge permit.
- The following Guide provides context to ORC residential earthworks provisions, consent information and on-going consent compliance requirements. This includes content required for any Environmental Management Plans (EMPs) and Erosion and Sediment Control Plans (ESCPs) which are necessary for the majority of consents granted by the ORC: <https://www.orc.govt.nz/media/14398/residential-earthworks-in-otago-3-2023.pdf>
- An Environmental Management Plan (EMP) and Erosion and Sediment Control Plan (ESCP) (prepared by a SQEP) should demonstrate robust mitigation of construction-phase risks, including consideration to GD05 and protection of wetlands on site.

Wetlands

- You advised that there are natural wetlands on site. The National Policy Statement for Freshwater Management 2020 defines a natural wetland as:
natural wetland means a wetland (as defined in the Act) that is not:
(a) a wetland constructed by artificial means (unless it was constructed to offset impacts on, or restore, an existing or former natural wetland); or
(b) a geothermal wetland; or
(c) any area of improved pasture that, at the commencement date, is dominated by (that is more than 50% of) exotic pasture species and is subject to temporary rain-derived water pooling.
- A wetland as defined in the Resource Management Act 1991:
wetland includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions
- Resource consents maybe required under the Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Should applications be required, all wetlands on site must be delineated and assessment must included potential impacts on wetland hydrology during and after construction.

Discharge of Stormwater

- The RPW contains rules which relate to the discharge of stormwater. The proposal could potentially meet permitted activity rules; however, ORC would expect good management practice in the treatment of stormwater before discharge, especially given the recent national direction on water quality.
- The application should:
 - confirm whether stormwater will be managed on-site or via a reticulated system. Identify discharge points and assess whether permitted activity rules are met, or if consent is required.
 - Provide detail on overland flow management and proposed stormwater retention.
 - Detail erosion and sediment control measures for the construction phase.
 - Include an environmental assessment that address stormwater discharge effects.

Mana whenua and cultural values

- In the application, should outline any engagement with mana whenua.

- Please identify any sites of significance, and whether a Cultural Impact Assessment (CIA) has been undertaken or is planned.
- Please also assess if the proposal aligns with iwi values and consider including a Cultural Impact Assessment.

Air Discharges

- The Regional Plan: Air for Otago (**RPA**) contains rules which may be relevant during the construction phase of the development, such as dust related to construction activities.
- Rule 16.3.13.1 of the RPA provides the permitted activity criteria for discharges from building and construction activities, including road construction and maintenance, but excluding the remediation of asphalt surfaces (seal burning). These discharges are permitted under the RPA, providing any discharge of smoke, odour, particulate matter or gas is not noxious, dangerous, offensive or objectionable at or beyond the boundary of the property. If this rule cannot be met, consent is required.
- A copy of the RPA can be found here: <https://www.orc.govt.nz/media/1412/regional-plan-air-for-otago.pdf>

Defense against water

- The proposal involves the construction of a defense against water. This requires a land use consent for the erection of the structure as well as a diversion permit for the associated redirecting of floodwater. Please note that the RPW also includes objectives and policies to avoid the exacerbation of any natural hazards or creation of hazards associated with lakes and rivers.

Diversion of water

- If the development of the site will involve the damming or diversion of water, then there are permitted activity rules under rules in the RPW that may apply. If the criteria given in these rules cannot be met resource consent would be required under Chapter 12.3 of the RPW

Conditions of Consent

- Council has a range of standard conditions that are typically applied to the consents outlined above. A copy of these standard conditions are available upon request and will be provided to the Fast-track Panel in due course.

Natural Hazards Comments

- The proposal will need to consider the possible landslide/rockfall hazard from the slopes of Morven Hill immediately to the west, and also an appropriate setback from the steep terrace face down the Kawarau River given possible slope stability or erosion issues.

Science Comments

- Caution is needed around groundwater for the proposed water supply given Arsenic issues in groundwater in that area. Note that arsenic concentrations can fluctuate over time. Also there are likely to be limited groundwater quantities at the development site unless down in the Kawarau River floodplain type area.
- It was indicated that the location for the proposed disposal field was on a terrace adjacent to the Kawarau River. There needs to be sufficient separation between any groundwater takes and the disposal field. There are potential issues with failure of a

ground-based disposal field so close to the river. In addition, there is a flood risk from the Kawarau to any infrastructure adjacent to the river.

- There are potential wetlands in the undulating topography in the development area.
- There is a potential rockfall risk from outcrops on the hill adjacent to the development.
- Unmapped mine workings could be present near the development. Historic underground mining activity is usually found at the schist bedrock/gravel interface.
- If solid wood burners are installed, this could create air quality issues in the area.
- An expectation is a full ecological assessment would be completed by a suitably qualified expert on the species and ecosystems in the area before the proposed project commences. Given its location, threatened or at-risk plants and animals, as well as rare ecosystems, could be impacted by the proposed project. Likely high ecosystem values on the hill - plans indicate this will not be developed.

Planning and Policy Comments

Policy comments below are focused on issues and provisions that we consider should be addressed in the application.

For context, ORC has responsibilities together with QLDC for urban development matters under the NPS-UD 2020. ORC and QLDC are also members of an Urban Growth Partnership overseeing Queenstown's Spatial Plan.

Generally, we suggest the application should focus in more detail on how the proposed development will integrate with existing urban areas, and any impacts on water quality given the proximity of the site to Lake Hayes and the Kawarau River, and the underlying Wakatipu Basin Aquifer. There are likely to be links between Policy's comments on relevant Spatial Plan matters, and Transport's comments on any impacts on the wider transport network and any challenges of providing a viable public transport network to the site.

More specifically, the below key elements of the Queenstown Spatial Plan are suggested for more detailed consideration in the application:

- The proposed mix of typologies including 1, 2 and 3 bedroom dwellings, and the proposed affordable housing component, are acknowledged as likely to contribute to achieving greater housing choice and therefore contribute towards achieving Outcome 1 of the Queenstown Spatial Plan.
- However, as the site is not a priority development area or a future urban area in the Spatial Plan (the closest priority development area being Ladies Mile) more consideration should be given to how the proposal will contribute to achieving consolidated growth, which is also part of Outcome 1 of the Spatial Plan.
- Outcome 2 of the Spatial Plan envisages that public transport, walking and cycling is the preferred option for daily travel. While the connectivity aspects of the proposal are acknowledged, more assessment should be undertaken of how people will undertake daily travel to places of employment, and to primary and secondary schools.

Further, there are a number of relevant Regional Policy Statement provisions (operative RPS 2019 and proposed RPS 2021) that the application should consider:

- RPS19 and pORPS – Freshwater provisions/chapter: further consideration of any impacts on water quality (including groundwater) and how the policy framework is met.
- RPS19 and pORPS – Natural Features and Landscapes provisions/chapter: further consideration of how the proposal will protect the Outstanding Natural Landscape (ONL).

- RPS19 and pORPS – Hazards and Risks provisions/chapter: detailed consideration of any natural hazard risks and how the policy framework is met.
- pORPS – Urban Form and Development chapter: further consideration of how the proposal will integrate effectively with surrounding urban areas and rural areas, and support climate change adaptation and mitigation.
- RPS19 and pORPS – Ecosystems and Indigenous Biodiversity provisions/chapter: further consideration of how the proposal will meet the chapter objectives and other provisions, including in particular how mana whenua will exercise their role.

In regard to the above, Policy notes that the following pORPS provisions are particularly relevant and should be considered in more detail in the substantive application:

UFD-O1 – Development of urban areas

This objective envisages that development and change of urban areas occurs in a strategic and coordinated way, which (among other things):

- integrates effectively with surrounding urban areas and rural areas.
- results in a consolidated, well-connected and well-designed urban form which is integrated with infrastructure.

UFD-P4 – Urban expansion

This policy provides that expansion of existing urban areas may occur where, at a minimum, the expansion (among other things):

- achieves consolidated, well designed and sustainable development in and around existing urban areas.
- is integrated efficiently and effectively with development infrastructure and additional infrastructure in a strategic, timely and co-ordinated way.

“Development infrastructure” is defined in the pORPS to include land transport controlled by a local authority. Any Transport comments about capacity on the existing public transport network and impacts on the wider transport network will also be relevant to consideration of the pORPS provisions relating to integration.

Finally, many provisions in the Natural Features and Landscapes (NFL), Hazards and Risks (HAZ) and Urban Form and Development (UFD) chapters in the pORPS are subject to appeal. This includes UFD-O1 and UFD-P4. Please be aware that the provisions may change as a result.

Conclusion

It is noted that this information has been provided based on discussion of information provided by you about your proposal and therefore there may be other requirements identified once your application is lodged.

The costs related to this service include but are not limited to; administration, research, meeting time, taking minutes, distribution of meeting notes, and question follow ups. 30 minutes of work carried out by the Consents Officer is free of charge. The remaining work is charged at the relevant officer's hourly rate in accordance with the fees and charges schedule which can be found [here](#).

Next Steps

If you believe any of this information is not relevant to your proposal, have any queries or require clarification on the information provided please contact me on 0800 474 082 or by emailing [s 9\(2\)\(a\)](#)

Yours sincerely



Alexandra King
Consents Manager

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Ridgeburn
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Queenstown Lakes District Council (QLDC)		
*First name	David		
*Last name	Wallace		
Postal address	74 Shotover Street, Queenstown, Otago, 9300		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<u>Foreword</u> The following constitutes QLDC written comments made in response to the invitation from the Minister under section 17(1)(a) and (3)(a) and (b) of the Act in relation to the application for referral of the Ridgeburn project under the Fast Track Approvals Act 2024 (Act). Within the sub-sections below, QLDC also responds to the specific request made to QLDC under section 20 of the Act, which asks “whether the Council considers the project would have significant regional or national benefits, and in that context, whether the Council has any high-level comments on the project’s alignment with any respective plans, policies or strategies”. <u>S17(3)(a) - Competing Applications</u> QLDC is not aware of any applications for an activity that are similar in nature to the proposed development, or that would be competing applications if a substantive application for the project were lodged.

Insert Fast-track logo

S17(3)(b) - Existing resource consents to which sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 would apply

QLDC is not aware of any existing resource consents relevant to this site or proposal where 124C(1)(c) or 165ZI would apply.

S17(1)(a) - Additional Comments

In providing written comment on the referral application, QLDC has considered the requirements set out in sections 11, 13 and 21 of the Act.

Consultation

Consultation with QLDC prior to lodging the referral application is mandatory. The applicant met with QLDC staff on 9th May 2025 and presented a brief overview of the concept of the proposal, with detail limited to a draft master plan and a photo montage.

The application as now lodged includes a number of technical assessments and plans that were not provided to QLDC prior to this application being lodged. These additional assessment and plans present the proposal in significantly greater detail than was afforded to Council prior to lodgement.

As QLDC have not been provided with a full draft application with sufficient time for consideration, QLDC is of the view that the applicant has not engaged QLDC in meaningful consultation as required by section 11 of the Fast-Track Approvals Act 2024.

Principal Issues

The proposal raises significant concerns for QLDC. These concerns are outlined in detail below, however are briefly summarised as follows:

- The development is not consistent with any council endorsed policy, including the Council's Spatial Plan and any infrastructure/funding plans. It is not located within a future growth area.
- The proposal amounts to urban development outside the urban growth boundary set by the district plan. The Proposed District Plan (PDP) directs that such an outcome be avoided.
- The location is both within and directly adjacent to both an Outstanding Natural Landscape (ONL) and an Outstanding Natural Feature (ONF).
- Being within and directly adjacent to an ONL and ONF raises significant concerns in respect of whether the values of those nationally important landscapes will be protected, and whether the level of adverse effects on them can be mitigated. Significant effects on the rural character and amenity values of the rest of the site, and beyond, are expected as well.
- The development will pose significant issues for QLDC water / wastewater services if there is an expectation that the onsite systems being proposed will be vested to Council in the future.

- The Environment Court turned down a zoning appeal on land neighbouring the Ridgeburn site, where the applicant was only asking for only approximately 30 more houses.

Potential Adverse Effects

Landscape character and visual amenity values

As stated in the Applicant's AEE, the 212 hectare subject site is located at 122 Morven Ferry Road, between Arrowtown and the Kawarau River. The site is 'split zoned' with the north and west of the site predominately zoned Wakatipu Basin Rural Amenity Zone (WBRAZ) and the balance of the site zoned Rural Zone. The western extent of the site is identified as being part of an ONL and the site is also located on the ONF of Morven Ferry Hill itself. Part of the site is zoned 'Rural Character Landscape'.

There has been significant Court litigation on the planning framework under the PDP that should apply to development within both ONL and ONFs in the District, including in the strategic chapter, the WBRAZ and Rural Zones (the latter including the Rural Character Landscape overlay (RCL overlay)). The strategic chapter of the PDP recognises the significant contribution the ONL and ONF landscapes have to the District's economy, with Strategic Issue 4 being:

Some resources of the District's natural environment, particularly its outstanding natural features and outstanding natural landscapes and their landscape values, require effective identification and protection in their own right as well as for their significant contribution to the District's economy.

The PDP confirms the retention of the District's distinctive landscapes as a key strategic objective that play a large role in Queenstown's tourist/visitor industry. Landscape values of ONF and ONL are to be protected including by ensuring all development and changes to landform will be reasonably difficult to see from beyond the boundary of the site in question. Court decisions in resource consent applications in recent years have supported the importance of the reasonably difficult to see "test". Within the Rural Zone RCL overlay, landscape character is to be maintained and the landscape's visual amenity values are to be maintained or enhanced. Similar direction is required within the WBRAZ.

Court litigation on the WBRAZ framework itself considered landscape effects of development proposals in these zones. This includes an interim decision¹ finding that *"In effect, the WBRAZ, and in particular the 80ha² standard, is a deliberate shift in the regulatory regime of the Operative District Plan. A fundamental purpose of Chapter 24 (and related Chapter 27³ provisions) is to endeavour to arrest and redirect that development; that is to fundamentally change course, at a strategic level"*.

¹ *Barnhill Corporate Trustee Ltd v Queenstown Lakes District Council* [2022] NZEnvC 58, at [55].

² Hectare.

³ Chapter 24 WBRAZ; Chapter 27 Subdivision and Development.

The Environment Court issued a decision ⁴ in November 2024 on a re-zoning appeal that related to approximately 42 ha area of land across a number sites located immediately east of the subject site, including Lot 2 DP 411193, Lot 1 DP 300661, Lot 12 DP 323200 and Lot 3 DP 588118 .

In this appeal the appellant sought the land be rezoned from WBRAZ (which requires a 80 ha minimum lot size for subdivision) to a 'Lifestyle Precinct', a more enabling sub-zone of the WBRAZ, which would have enabled approximately 30 dwellings. The Court found that this upzoning would fail to maintain landscape character and visual amenity values of the landscape character unit (LCU 18) that it was situated in, as well as the wider Wakatipu Basin. As such the appeal was declined. This proposal is within the same LCU.

Given this Environment Court decision for approximately 30 dwellings on land neighbouring the proposal site, it is difficult to see how a proposal for 1250 dwellings along with a commercial village precinct and the necessary supporting infrastructure would be appropriate on the land directly adjacent.

Given QLDC's experience in Court appeals relating to the Rural Zone ONL, ONFs and RCL overlay, along with the WBRAZ 80 ha regime, QLDC expects the assessment of landscape and visual effects (Appendix 4 to the application) understates the adverse effects of the proposal, not just on the relevant catchment within the WBRAZ, but the entire Wakatipu Basin – which is relevant under the policy framework confirmed by the Environment Court, including in its decision on the adjacent development.

Transport

The Application states that Morven Ferry Road and the intersection with State Highway 6 (SH6) will require significant upgrade to cater for the additional traffic flows and possible speed reductions required for SH6. However, there are no indications whether NZTA will be supportive of this. There is no assessment of flow-on effects beyond this SH6 intersection.

Furthermore, the subject site does not adjoin any existing urban areas or active travel links (other than a recreational river trail). Without provision of the necessary supporting services or land-uses such as schools and public transport there is significant risk of car dependency, travelling from the site resulting in significant adverse effects upon the currently constrained transport network and exacerbating traffic congestion that occurs at peak times on SH6. There is no assessment of increased greenhouse gas emissions given the location of the proposed 'village' within a very rural area and the need to travel to neighbouring urban areas – especially when the application considers the 'close' location to Arrowtown and Ladies Mile is a positive.

The applicant proposes that on-site commercial activities, remote working opportunities, and wider travel demand management measures including off-site park-and-ride facilities, carpooling, new bus stop, and shared transport schemes will help reduce reliance on private vehicles and rely on these for mitigation to ensure the safety and efficiency of the surrounding transport network is maintained.

⁴ *Barnhill Corporate Trustee Ltd v Queenstown Lakes District Council* [2024] NZEnvC 302

However, these are either beyond the control of the applicant or not included in the proposal and therefore cannot be relied upon as mitigation.

Infrastructure/Servicing

The proposal suggests the infrastructure that will be installed to support the development could potentially connect to the Council's existing network in the future and therefore become the responsibility of the Council and its ratepayers. This is problematic for QLDC and raises a significant concern because the site does not border any current Council infrastructure, and any infrastructure vesting would depend on substantial upgrades and new infrastructure to Councils existing systems outside of the site that are neither planned nor funded at this time under the Long Term Plan 2024-2034 (LTP). This is also problematic because the site is well outside the Urban Growth Boundary, and it is not identified as a growth area in Councils Spatial Plan or accounted for in Councils 30 year Infrastructure Strategy. As such, QLDC has no intention of accepting the vesting of this development's infrastructure.

Infrastructure is considered further below in the context of the s.20 request for comment on alignment with Council's plans.

Open Space and Reserves

1250 dwellings will generate the requirement for several local parks (approximately 0.3ha each). The QLDC Parks Strategy, Future Parks Provision Plan requires at least one community park approximately (2ha) and more than one local park (0.3ha) for a development of this size to meet the community's recreation and social needs. The development proposes one 'community node' and some green spaces – these appear to be located within steeply contoured or linear areas (in other words they would not be acceptable to QLDC nor fit for purpose) or have stormwater infrastructure indicated within (which does not constitute a useable public open space). Sufficient, nor appropriate land has not been set aside for recreation reserves and no community facilities are proposed.

Both Local and Community Parks need to be predominantly flat quality recreation land, suitable for a variety of recreation activities. The land also needs to accommodate structures and buildings, such as playgrounds, tennis courts, a sports field, public toilets, community rooms. These parks need to be large enough to provide community gathering spaces and a variety of activities. These are the areas where the residential community will connect.

This is in addition to the other open space that has other primary functions such as connections, stormwater or setbacks.

Whilst there is recognised benefit from the proposed native revegetation through contribution to biodiversity in the area once established, no detail has been provided as to who will maintain the ecological areas – will they be managed by the developer in perpetuity? The area has a significant rabbit pest problem which would need to be overcome to ensure viability of native restoration.

Consistency with QLDC Planning Documents

Proposed District Plan (PDP)

Insert Fast-track logo

Strategic Chapter 4, Urban Development

The PDP directs that urban development be avoided outside of urban growth boundaries. The proposal will fall within the definition of urban development in the PDP. The proposal therefore directly conflicts against that avoid direction.

As outlined above, the proposed development is directly at odds with the zoning of the land. The WBRAZ regime directs development to areas subject to a 'Lifestyle Precinct' subzone. Outside of the Precinct, the WBRAZ applies a minimum subdivision density of 80 ha, which was recently upheld by the Environment Court. The site lies within Landscape Character Units 17 (Morven Ferry) and 18 (Morven Eastern Foothills) - the PDP requires that any development (including subdivision) in this part of the Wakatipu Basin must not be inconsistent with any of the policies that serve to achieve the overall 'maintain or enhance' landscape values direction. Further, the landscape capacity must not be exceeded. The development proposed is significantly at odds with what the PDP anticipates across the WBRAZ part of the site.

In respect of the ONF it appears that some dwellings are located within the ONF. In respect of the ONL part of the site, while the application states that no 'physical' development is proposed in the ONL, it is not clear what changes are proposed. Development in the foreground of an ONL can still significantly effect the values of the ONL. As stated earlier, the PDP recognises the economic contribution that the District's landscapes make to the economy.

As such, it is expected that the proposal will be contrary to a number of key Objectives and Policies of Chapter 3 (Strategic Direction), Chapter 4 (Urban Development), Chapter 6 (Landscapes), Chapter 21 (Rural Zone), Chapter 24 (Wakatipu Basin) and Chapter 27 (Subdivision and Development), which critically seek to avoid urban development outside of the urban growth boundaries (Council is currently hearing a plan change to enable further intensification within the District's urban areas), protect ONL and ONF, and maintain or enhance landscape character and visual amenity of the Wakatipu Basin.

Consistency with other QLDC Strategic Documents

This development is not identified within the Council's Spatial Plan, LTP, 30-year Infrastructure Strategy and is not aligned with the Parks and Open Spaces Strategy or the Future Parks Provision plan. As a result, there has been no strategic focus or investment planning to support development at this scale in this area.

The proposal suggests installing infrastructure that could potentially connect to the Council's existing network in the future. As set out above, the site does not border any existing Council infrastructure, and any infrastructure vesting would depend on substantial upgrades such as the installation of new servicing outside of the site that are neither planned nor funded at this time. Currently, there are no dedicated resources or provisions within the Council's infrastructure strategies to support such a development. Therefore, QLDC has no intention of vesting the proposed infrastructure and has concerns regarding the cost of maintaining infrastructure that does not align with its planned long-term strategies and predominately serves a single development.

Accommodating these infrastructure requirements would necessitate substantial planning, investment, and time, resources and processes that are incompatible with the expedited nature of a fast-track consent. Moreover, accommodating this development could divert resources from other priority projects and district needs in areas already planned to accommodate growth, raising concerns about its overall feasibility, whether the assessment of benefits has considered the opportunity cost and alignment with strategic infrastructure planning.

As the location does not adjoin existing urban areas or active travel links (except for adjoining a recreational river trail) without provision of the necessary supporting services or land-uses such as schools and public transport there is significant risk of car dependency to travel to Arrowtown or Frankton or beyond, resulting in significant adverse effects upon the currently constrained transport network and exacerbating traffic congestion that occurs at peak times on State Highway 6 as already mentioned above.

Significant National or Regional Benefit

Whilst Council acknowledges the need for delivery of houses and the benefits of this, it does not consider that this location is appropriate and instead would encourage supply of housing in existing urban areas or areas already identified by QLDC for growth under its Spatial Plan. As stated above, accommodating this development could divert resources from other priority projects as set out in Council's plans that have undergone Local Government Act consultation processes, and district needs would then not be met. There is also a FTAA substantive application currently being considered at Homestead Bay, by RCL, which is located within a future growth area, and provides for 2500 houses and associated commercial area and potential school site. If the RCL proposal is approved, the demand for housing in the district may need to be re-assessed.

The applicant does propose 180 affordable homes to address the shortage of sub-\$1m houses identified in the 2020 Housing Business Capacity Assessment. Whilst this is commended, without a mechanism to retain affordability into the future, only the first owner benefits before selling at market value (potentially at significant profit). As stated above, the site is not located near urban areas or public transport, which will impact on the viability of these houses being sold in the affordable range. It is also highly questionable whether it is Council's function to be enforcing conditions of consent that require the dwellings to be sold to the market within a particular price point.

QLDC has concerns that the adverse effects of the proposed development as outlined above, particularly in regards to landscape values, traffic impacts, urban development outside the urban growth boundary, could outweigh any benefit of the proposed development. The PDP recognises the economic contribution that landscapes make to the District's economy – they are the drawcard for tourists/visitors and locals alike. While QLDC has not peer reviewed the economic assessment provided as part of the application for the purposes of these comments, QLDC comments that, assuming the assessment is correct, the entire development would need to be completed to achieve such benefits. The assessment does not take into account other very large housing developments that are currently being proposed and claiming similar regional benefits (and which are located in more appropriate locations), and there is a question mark as to whether the benefits assessment can be true, when it is being considered in a silo.

Insert Fast-track logo

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

A handwritten signature in blue ink, appearing to be 'D. Wallace', with a stylized flourish.

David Wallace
General Manager Planning and Development
Queenstown Lakes District Council

22 August 2025

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



CORT-5043

Hon. Chris Bishop
Minister for Infrastructure
c.bishop@ministers.govt.nz

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Ridgeburn project. This project comprises approximately 1250 residential dwellings/units (including 180 affordable dwellings/units), a workers accommodation complex, and a commercial village precinct, alongside landscaping and integration with existing trails in the area.

This project would help respond to significant housing demand in Queenstown Lakes. Queenstown Lakes is one of the most expensive places in New Zealand to buy or rent a home. As at May 2025, the median home sale price was \$1.34m and the median weekly rent was \$743.

While Queenstown Lakes has the highest rate of new residential building consents in NZ (329 consents per 10k people), there is significant pressure from high population growth (22% increase from 2018 to 2023, second highest in NZ) and tourism. Many homes are used as holiday homes or short-term rental accommodation, exacerbating this pressure.

The Queenstown Lakes Spatial Plan promotes a consolidated and mixed-use approach to accommodating future growth in Queenstown Lakes. The Queenstown Lakes Spatial Plan aims to concentrate growth in existing urban areas. The project site unlocks new land for development, is currently zoned rural, departing from the Queenstown Lakes Spatial and District Plans. The site has not been identified as a future urban zone.

The applicant has agreed to set aside 180 homes as affordable housing – it is not clear whether these homes would be provided to the Queenstown Lakes Community Housing Trust or sold directly to homebuyers at lower prices. As far as I am aware, this is a privately funded project, with no central government funding requested.

I have also not been made aware of any natural hazard risks on the site, although this will be examined by the Expert Panel in more detail in the next stage of the Fast-track application process.

I have no concerns, from the perspective of the Housing Portfolio, about this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora

A handwritten signature in blue ink, reading 'Tama Potaka'.

Hon Tama Potaka
Associate Minister of Housing

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: CORPG3575 | Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078
Date: Friday, 8 August 2025 4:32:31 pm

Please see comments below from Minister for Arts, Culture and Heritage

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Friday, 8 August 2025 4:20 PM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: FW: CORPG3575 | Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078

Kia ora Team,

The Hon Paul Goldsmith, Minister for Arts, Culture and Heritage has no comments on this fast-track proposal.

Thanks and regards,



Sarah Schroder
Acting Private Secretary (Administration)
Office of Hon Paul Goldsmith
Minister for Arts Culture and Heritage | Minister of Justice
Minister for Treaty of Waitangi Negotiations | Minister for Media and Communications

Email: [s 9\(2\)\(a\)](#) Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 25 July 2025 8:01 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: CORPG3575 | Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078

To:
Minister for Economic Growth
Minister for Regional Development
Minister for the Environment
Minister of Conservation
Minister for Arts, Culture and Heritage
Associate Minister of Housing

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Ridgeburn Limited for referral of the Ridgeburn project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2505-1078).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Ridgeburn
Applicant	Ridgeburn Limited
Location	Arrow Junction, Queenstown
Project description	The project is to develop a business park and service area and involves the establishment and operation of: a. approximately 1250 residential dwellings/units (including 180 affordable dwellings/units), a 'workers' accommodation/accommodation complex, and commercial village precinct (retail, hospitality, community services, office space) b. 60 hectares of landscape and ecological enhancement, including native planting c. integration with existing and proposed walking and cycling

	trails
--	--------

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport |
Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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04 AUG 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Two Fast-track Approvals Act referral applications – Received 18 July

Dear Chris

Thank you for the opportunity to comment on two applications for referral under the Fast-track Approvals Act (FTAA):

- Out of Scope
- Ridgeburn, FTAA-2506-1078.

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

Ridgeburn, FTAA-2506-1078

This project seeks to build approximately 1,240 houses, including 180 high-density homes, and a mix of commercial, retail, recreational spaces and a workers' accommodation complex in the Queenstown Lakes District. The proposed development will include various typologies of housing (one- to three-bedroom), a supermarket, a business centre, a daycare, and worker/visitor accommodation.

Quantitative estimates from the project's economic assessment provided by the applicant shows significant short-to-medium term benefits over a projected seven-year construction and development period. This includes \$997 million of total direct expenditure and an estimated total impact of \$710 million in business activity in the Otago region. During this period, 6,555 full-time jobs will be generated, 3,298 roles directly related to construction.

This proposal provides a substantial investment for housing infrastructure in the Queenstown area. These benefits also include significant employment opportunities in the region during the construction period. The long-term economic benefits include ongoing employment from retail activities and the provision of high-density and more affordable housing options in a tourism-focused region. This project aligns with the Government's economic growth ambitions by increasing housing supply, which is crucial to a growing economy.

Given that the primary outcome of the proposal would be a significant boost to housing supply, this application may be best assessed under section 22(2)(a)(iii) of the Act, specifically for its potential to increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment.

Sincerely

A handwritten signature in blue ink, appearing to read 'Hon Nicola Willis', is positioned above the printed name.

Hon Nicola Willis
Minister for Economic Growth

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078
Date: Monday, 11 August 2025 12:12:52 pm
Attachments: [image002.png](#)

Hi team, please see the comment from the Minister for the Environment below.

From: Environment Portfolio <Environment.Portfolio@parliament.govt.nz>
Sent: Monday, 11 August 2025 12:09 PM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: FW: Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078

Good day,

Thank you for the below invitation to comment.

Please be advised that Minister Simmonds has reviewed this application and does not wish to provide comment.

Kind regards,



Office of Hon Penny Simmonds

Environment Portfolio

Minister for the Environment | Minister for Vocational Education
Associate Minister for Social Development | MP for Invercargill

Website: www.beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 25 July 2025 8:01 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078

To:
Minister for Economic Growth
Minister for Regional Development
Minister for the Environment
Minister of Conservation
Minister for Arts, Culture and Heritage
Associate Minister of Housing

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Ridgeburn Limited for referral of the Ridgeburn project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2505-1078).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

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If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

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Project summary

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Yours sincerely

Hon Chris Bishop
Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport |
Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3
Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
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From: s 9(2)(a)
To: [FTAreferrals](#)
Subject: FW: Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078
Date: Wednesday, 30 July 2025 12:58:47 pm
Attachments: [Comments Form for Invited Ministers.docx](#)
Importance: High

No comment on this application from Minister for Regional Development

From: Leah MacDonell s 9(2)(a)
Sent: Friday, 25 July 2025 11:34 AM
To: Rob Schick s 9(2)(a)
Subject: FW: Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078
Importance: High

Morning

No need to respond back – just to let you know the Minister will not be commenting on this one.

Thanks,

Leah

From: Hon Shane Jones <Shane.Jones@parliament.govt.nz>
Sent: Friday, 25 July 2025 9:35 AM
To: Leah MacDonell s 9(2)(a) Oliver Taylor s 9(2)(a)
Cc: Ashleigh Munn s 9(2)(a)
Subject: FW: Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078
Importance: High

Fast track correspondence

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 25 July 2025 8:01 am
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Ridgeburn project under the Fast-track Approvals Act 2024 – FTAA-2505-1078

To:
Minister for Economic Growth
Minister for Regional Development
Minister for the Environment
Minister of Conservation
Minister for Arts, Culture and Heritage
Associate Minister of Housing

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I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Ridgeburn
Applicant	Ridgeburn Limited
Location	Arrow Junction, Queenstown
Project description	The project is to develop a business park and service area and involves the establishment and operation of: a. approximately 1250 residential dwellings/units (including

	180 affordable dwellings/units), a ‘workers’ accommodation/accommodation complex, and commercial village precinct (retail, hospitality, community services, office space) b. 60 hectares of landscape and ecological enhancement, including native planting c. integration with existing and proposed walking and cycling trails
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Yours sincerely

Hon Chris Bishop
Minister for Infrastructure



Office of Hon Chris Bishop
Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3
Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Ridgeburn
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation		
*First name	Terry		
*Last name	Calmeyer		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ; s 9(2)(a)		

2. Please provide your comments on this application
Comments follow overleaf.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff



Jenni Fitzgerald

22 August 2025

Director-General of Conservation s17 comments

Project name	Ridgeburn
Applicant name	Ridgeburn Limited
Application number	FTAA-2506-1078
Project summary details	The project is located at the Arrow Junction, Queenstown (south of SH6 between Lake Hayes and Arrowtown Junction) and is to develop a business park and service area and involves the establishment and operation of: a. approximately 1,250 residential dwellings/units (including 180 affordable dwellings/units), a ‘workers’ accommodation/accommodation complex, and commercial village precinct (retail, hospitality, community services, office space) b. 60 hectares of landscape and ecological enhancement, including native planting c. integration with existing and proposed walking and cycling trails d. Water take, water treatment plant, wastewater treatment plant and discharge to land Approval under Section 53 of the Wildlife Act 1953 – for the handling or incidental harm of indigenous lizards (korero gecko (<i>Woodworthia “Otago/Southland large”</i> – At Risk – Declining) that may be present within the Site. Wastewater discharge is proposed adjacent to public conservation land (Marginal Strip – Kawarau River). A raw water pipeline from a water take from the Kawarau River could require an easement on public conservation land, that is not included in the authorisations indicated.

1 General comment

- 1.1.1 As the project includes an approval under a specified Act for which DOC is the administering agency, the applicant was required to undertake pre-lodgement consultation in accordance with section 11.
- 1.1.2 In relation to this application, the applicant took steps to consult with DOC prior to lodging. Consultation was initiated on 13 May 2025, a consultation meeting took place on 23 May 2025, and the referral application lodged on 25 May 2025. As such, the period available to respond and engage did not enable DOC to provide specific feedback prior to the applicant

lodging the referral application. This version of the application for referral was returned to the applicant. The applicant re-lodged the application for referral on 25 June 2025. There was no further engagement with DOC between the application being returned and re-lodgement.

- 1.1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects it considers it likely that with the appropriate design and conditions, effects can be managed to appropriate levels.
- 1.1.4 DOC is not aware of any other reason the project should not be referred.

2 Minister's decision on referral application

- 2.1.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.1.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.1.3 For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should take into account.
- 2.1.4 Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	The meaning of ineligible activity is set out in s5 of the FTAA – DOC has considered s5(1)(f), (h), (i), (j) and (k) and has not identified any aspect of the project that would meet the definition.
21(3)(c)	Is there adequate information to inform a decision	The lizard species that the applicant has identified as potentially occurring on the site differs from the species that DOC expects to find on the site. If the referral to the fast-track process is granted and the applicant proceeds with the substantive application process, then detailed surveys would need to be undertaken. These surveys would confirm which species, if any, are found on the site. Regardless of this, DOC considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.

Section	Criteria	Comments
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	The Ngai Tahu Claims Settlement Act 1998 applies to this area. DOC is not aware of any inconsistency with the relevant Treaty settlement, subject to any comments from the Treaty partner under s17(1)(d).
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the conservation approval identified should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	No comprehensive surveys or investigations of ecological features, including watercourses and natural inland wetlands and habitat of fauna have been undertaken by the applicant. As such DOC considers there is the potential for the project to have significant adverse effects given values known/anticipated to be present. Overall, however, based on the high-level information available, DOC considers that it is likely adverse effects of the project can be addressed through the design phase and appropriate conditions imposed.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history under the Wildlife Act 1953.
21(5)(g)	Would a substantive application have any competing applications	DOC has identified three applications for various activities that, if they are granted, authorise the ability to carry out the activity(s) everywhere in NZ, however, exercise of such an authorisation on private land is always subject to the landowner's permission. • 121232-FAU: Lizard survey to confirm presence and estimating abundance at all PCL/Private land in all districts in the South Island. Proposed term: 10 years • 119762-FAU: Nationwide authority under the Wildlife Act to capture, band and release birds on public conservation and non-public conservation land. Proposed term: 10 years • 119794-FAU: Lizard Survey for private/council reserves within the Southern South Island

Section	Criteria	Comments
		operations regions excluding Stewart Island. Proposed Term: 10 years None of these would prevent the applicant from site specific approvals, and DOC views this as a low risk.

2.1.5 Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	DOC notes that a Wildlife Act approval of this nature would typically take three-four months to process. However, there may be benefits for the applicant in terms of consideration being combined with RMA approvals, and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No comprehensive surveys or investigations of ecological features, including watercourses and natural inland wetlands and habitat of fauna have been undertaken by the applicant. As such, DOC considers there is the potential for the project to have significant adverse effects given values known/anticipated to be present. Overall, however, based on the high-level information available, DOC considers that it is likely adverse effects of the project can be addressed through the design phase and imposition of appropriate conditions.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The proposed site is located in the area subject to the Otago Conservation Management Strategy, which provides guidance for DOC's work in the form of a vision, objectives, outcomes for places, policies and milestone. No inconsistencies with the Strategy have been identified.

Section	Criteria	Comments
22(b)	Any other matters the Minister may consider as relevant?	The application proposes two possible locations for a water take from the Kowarau River. One of these would require the raw-water supply pipeline to traverse the Kowarau River Marginal Strip and the alternative location appears to potentially traverse the Kowarau River Conservation Area, which could require an easement from DOC. The applicant has not identified that they intend to apply for a concession for this. If a concession is sought via the usual concession application process it is unlikely to risk impacting the project if delayed or declined.

3 Other considerations

- 3.1.1 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to-date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver. The applicant has not identified that they intend to apply for an easement for their raw-water pipeline to traverse the Kowarau River Marginal Strip or the Kowarau River Conservation Area in this FTAA proposal. An easement would be required if the raw water pipeline traverses these public conservation areas.
- 3.1.2 Given the lack of assessment undertaken at the referral stage, DOC considers it may be beneficial for the applicant to consider whether it should seek to include additional approvals that would potentially be required on a precautionary basis. To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s 20 prior to making their decision to ensure all approvals in scope of the FTAA, and necessary to implement the project are included. In particular, DOC recommends consideration is given to whether any easements through public conservation land should be included in the scope of approvals sought.

4 Matters for the Minister to specify (s27)

- 4.1.1 DOC notes that there is no obligation on an applicant to undertake pre-lodgement consultation with administering agencies in respect of a substantive application for a referred project. Given the lack of detail in the referral application DOC considers it would be highly beneficial for the applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of

any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

- 4.1.2 To this end, DOC suggests the Minister considers specifying that evidence of further engagement with DOC be submitted with the substantive application, should the decision be to accept the referral application.



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 22 August 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011



Heritage New Zealand Pouhere Taonga comments on Southland Wind Farm referral application

Application name	Ridgeburn
EPA reference	FTAA-2505-1078
Applicant/s	Ridgeburn Limited
Comments due by	22 August 2025

Organisation name	Heritage New Zealand Pouhere Taonga		
*First name	Eva		
*Last name	Foster-Garbutt		
Postal address	PO Box 2629 Wellington 6140		
*Home phone/Mobile phone		*Work Phone	027 241 3624
*Email	fasttrack@heritage.org.nz		
Submission prepared by	James Sutherland - Planner		
Contact details	s 9(2)(a)		

General comment on application and recommendations

Thank you for the opportunity to comment on the referral application for Ridgeburn Limited, Ridgeburn Fast Track Project. Heritage New Zealand Pouhere Taonga (HNZPT) has assessed the application, with input from specialist regional heritage staff, including those with Māori heritage, planning and archaeological expertise.

Based on the information provided, if the project is referred by the Minister, we recommend the following:

- An Archaeological Authority may be required for any proposed earthworks around known and unknown archaeological sites, subsequent to the findings of the archaeological assessment,
- HNZPT should be invited to comment further in the substantive phase of the Fast-track Approvals process in relation to archaeological sites within the project area,
- HNZPT can confirm that the applicant has consulted with us in the pre-application stage.



Cultural heritage values

There are no historic places within the proposed application site, or within the transmission corridors, that are listed on the New Zealand Heritage List Rārangi Kōrero.

The Project Site is within the takiwā of Ngāi Tahu ki Murihiku and encompasses the interests of four papatipu rūnaka. We understand the applicant has had an ongoing dialogue with Te Ao Mārama Incorporated, and Aukaha Limited as representatives of Ngāi Tahu ki Murihiku, who have provided a summary of consultation in Appendix 14 of the Assessment of Environmental Effects. We support manawhenua aspirations and recommendations.

The application site does not sit within any specific provisions of the Ngai Tahu Claims Settlement Act 1998 and Ngai Tahu Deed of Settlement 1997, however it is a place of cultural significance, forming part of the extensive network of kaika Mahika kai and ara tawhito throughout the area. The name of the Shotover River is Kimi-akau meaning *‘to look for the coast’*, suggesting that the river was a main route for iwi to the pounamu fields on te Tai Poutini/West Coast.

We note the applicant has made a commitment to continuing collaboration with mana whenua to ensure the project is undertaken in a culturally appropriate way.

Archaeology

The applicant commissioned an archaeological assessment which has identified one archaeological site (F41/62) lying within the area of proposed works and nine lying outside but within proximity (F41/58,59,60,61,416,813,814,815 & 816). All sites are associated with mining, settler occupation, or agricultural land use of the area.

The applicant is aware of the potential for their works to impact known and unknown archaeological sites, and they have confirmed that they intend to apply for an archaeological authority. HNZPT suggests that due to the large scale and extensive works proposed, that a survey should be undertaken before HNZPT will accept any archaeological authority application.

With a site survey being completed, any impact to the archaeological values within the project area can be managed through the archaeological authority process.

We consider that an archaeological authority is required for the project. This is a legal requirement. We recommend that the applicant include in their substantive application the intention and appropriate documents to obtain an archaeological authority. The applicant must be aware that they will be required to apply separately under the Heritage New Zealand Pouhere Taonga Act 2014.

Recommendations

If the project is referred, the following information should be provided by the applicant in their substantive application:

- Confirmation that a site survey has been completed for the archaeological authority process,
- Confirmation that an archaeological authority will be obtained before commencement of works.

If the project is referred, the panel should invite the following persons to comment on the application:

- Heritage New Zealand Pouhere Taonga
- Aukaha,



- Te Ao Marama Inc.

The applicant has consulted with HNZPT regional staff at a pre-application meeting held at the Heritage New Zealand Pouhere Taonga Dunedin office on 22 May 2025 with the Southern Regional Archaeologists Rebecca Benham, Jasmine Weston, and Planner James Sutherland. We recommend that if the project is referred, that the applicant continue to consult with HNZPT regional staff where appropriate.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Ridgeburn
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	New Zealand Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning.nzta.govt.nz		

2. Please provide your comments on this application
NZTA thanks the Minister for the opportunity to comment on the referral of this application into the Fast Track approvals process. NZTA has had no pre-application engagement with the applicant regarding this project. As per the matters set out in the invitation to comment, NZTA provides the following commentary: 1. The project proposes an upgrade to the intersection to State Highway 6 (which connects to the project site). Are there any matters NZTA considers may adversely affect project delivery? NZTA agrees that an upgrade to the intersection of Morven Ferry Road and State Highway 6 (SH6) will be necessary to safely and efficiently accommodate the additional vehicle movements that would be generated by the proposed development. It is probable that the development would also result in an intensification in use of the Arrow Junction Road intersection with SH6, as this may be seen as the preferred route for travel to the east, potentially necessitating intersection improvements there too. Depending on the form of the intersection upgrade(s) determined to be

necessary to manage effects on the state highway network, there may be the need for additional (private) land acquisition to accommodate the upgrades, which could affect project delivery.

NZTA would need to see the substantive application to be able to determine the actual impacts of the proposal on these two SH6 intersections as well as the wider state highway network. As part of the substantive application, NZTA would expect to see a comprehensive Integrated Transport Assessment (ITA) that identifies, through appropriate modelling and expert technical assessment, the impact of the anticipated vehicle generation on the safe and efficient functioning of both those SH6 intersections and the wider state highway network, as well as specific mitigation measures to address adverse effects on the state highway network resulting from this development. That ITA should assume that the posted speed limit on SH6 will remain unchanged because of the Setting of Speed Limit Rule 2024 speed limit requirements for an Interregional Connector.

2. General comments on the referral application

The subject site will be indirectly accessed via SH6 (Lake Hayes-Arrow Junction Highway). State Highways are identified as 'Nationally significant infrastructure' (NSI) in the National Policy Statement on Urban Development (2020). Clause 22 of the FTAA outlines criteria for assessing referral applications and includes, at (2)(a)(ii), whether the project will enable the continued functioning of existing NSI.

NZTA has some concerns about potentially significant impacts the proposal could have on the functioning of parts of the wider SH6 network. While the inclusion of a commercial precinct of retail, hospitality, community services and office space within the development site will potentially reduce some of the demand to travel, urban development in this location has not been anticipated or planned for in Council strategic growth planning documents like the Queenstown Lakes Spatial Plan.

The subject site is not identified in the current or future planned or funded public transport service network. While the applicant intends to provide active travel connections, the site is so far removed from the main existing employment and service centres (Frankton, Queenstown and Arrowtown) that active travel uptake will likely be minimal. Consequently, NZTA anticipates the residents of this development will be heavily reliant on private vehicles for transportation beyond the development footprint, which will likely have significant downstream effects on the state highway network, SH6 in particular.

SH6 at Ladies Mile and the Shotover Bridge is known to have issues with traffic congestion at certain times of the day. Although several kilometres away from Ridgeburn Ltd's proposal, as there are no alternative routes, most traffic from the proposal will likely travel on SH6 through Ladies Mile to Frankton and beyond, for employment and services. Recently Queenstown Lakes District Council provided for new development at Ladies Mile, through the Te Pūhahi Ladies Mile District Plan variation, but capped the number of dwellings and required several state highway infrastructure upgrades to be in place before any residential units are occupied to ensure that impacts on SH6 are mitigated. NZTA anticipate that the Ridgeburn Ltd proposal will likely exacerbate these transport issues at Ladies Mile and Shotover Bridge, contributing – at peak travel times - to significant delays and queuing of vehicles, resultant poor levels of service, potentially

requiring further currently unplanned and unfunded highway infrastructures upgrades to mitigate these impacts.

NZTA is not opposed to the application being referred into the Fast Track approvals process, however we would want to ensure that the effects of the proposal on the state highway network are appropriately mitigated. NZTA would welcome the opportunity to provide comments on any substantive application in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran

Date 21/08/2025