



## FTAA-2603-1203: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 1 decisions

### Project Name: Simplicity Living – Te Pūtahi Ladies Mile

Date submitted:	20 April 2026	Tracking #: 26-BRF-01003	
Security level:	In-Confidence	MfE priority:	Urgent

	<b>Action sought:</b>	<b>Response by:</b>
To Hon Chris Bishop, Minister for Infrastructure	Decisions on recommendations in Table A	27 April 2026

Actions for Minister's Office staff	<b>Return</b> the signed briefing to: <a href="mailto:FTAreferrals@mfe.govt.nz">FTAreferrals@mfe.govt.nz</a> <b>Send</b> email to Ministers to invite written comments
Number of appendices: 3	Appendices: 1. Statutory framework summary 2. Application documents for the Simplicity Living – Te Pūtahi Ladies Mile project 3. List of the Māori groups referred to in section 18(2)

### Ministry for the Environment contacts:

Position	Name	Cell phone	1 <sup>st</sup> contact
Principal Author	Ashley Sycamore		
Acting Manager	Ben Bunting	s 9(2)(a)	
Acting General Manager	Stephanie Frame	s 9(2)(a)	✓

## Project location



*Image 1: Project location and architectural plans*

## Key messages

1. This briefing seeks your initial decisions on a referral application from Simplicity Living Limited (the applicant) for the Simplicity Living – Te Pūtahi Ladies Mile project (the project) under the Fast-track Approvals Act 2024 (the Act).
2. As the referral application was lodged after 31 March 2026, the provisions of the Fast-track Approvals Amendment Act 2025 are in force. This includes the amended time frame for receiving comments under section 17 from invited parties, which is now **15 working days** (reduced from 20 working days).
3. At this stage you can either decline an application for the reasons set out section 21, or provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to inform your final decision on whether to refer the project.

## Project details

4. The project is to construct and establish an urban development in Frankton, Queenstown, on approximately 10 hectares of land.
5. The project involves:
  - a. approximately 1,100 residential units, across a mix of three-storey walk-up apartments and apartment buildings of five to seven storeys
  - b. community facilities, including community rooms, open spaces and parks, and onsite car parking
  - c. a development lot intended to accommodate local commercial and retail activities
  - d. new internal roads within the site

- e. the construction of a signalised intersection and bus lane on State Highway 6
  - f. the provision of new, and upgrades to existing, three waters infrastructure, including stormwater management, water supply, and wastewater services, both internal and external to the site
  - g. fee simple subdivision to create development lots, roads, and a park to vest in Council
  - h. unit title subdivision of the walk-up and apartment buildings
  - i. associated bulk earthworks to facilitate the development.
6. The project area is located at and adjoining 12 Lower Shotover Road, Frankton, within the Queenstown Lakes District, and includes adjacent or nearby land and road reserves required to enable associated transport and three waters infrastructure works.
7. The applicant seeks the following approvals via the fast-track approvals process to authorise the project, including some approvals sought at this stage on a precautionary basis, subject to further investigations prior to any substantive application:
- a. resource consents under the Resource Management Act 1991 (RMA) as described in section 42(4)(a) of the Act
  - b. concessions under the Conservation Act 1987 as described in section 42(4)(e) of the Act
  - c. approvals under the Reserves Act 1977 as described in section 42(4)(e) of the Act
  - d. wildlife approvals under the Wildlife Act 1953 as described in section 42(4)(h) of the Act.

### **Initial recommendations**

8. We have undertaken an initial analysis of the referral application, and this is presented along with our considerations and recommendations in Table A.
9. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy have been paid.
10. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being:
- a. Queenstown Lakes District Council and Otago Regional Council as the relevant local authorities
  - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
  - c. the Minister of Conservation and the Associate Minister of Housing as the other relevant portfolio Ministers
  - d. Department of Conservation (DOC) as the relevant administering agency
  - e. the parties in Appendix 3 as the Māori groups identified under section 18(2) of the Act.
11. We also recommend that you invite written comments from the following additional

persons under section 17(5) of the Act:

- a. the Chief Executive of NZ Transport Agency Waka Kotahi – as the agency responsible for State Highway 6 adjoining the project area, noting the applicant proposes transport upgrades to the state highway to facilitate the project
- b. the Minister for Regional Development
- c. the Minister for Economic Growth.

12. The applicant identifies that the project may include the installation of three waters infrastructure within DOC-managed reserve land, which would meet the definition of public conservation land (PCL). As the project area includes PCL, we note you must obtain a report from the Director-General of Conservation under section 19(1) of the Act.

### Action sought

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13. Please indicate your decisions on the recommendations in Table A.

### Signature

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A handwritten signature in black ink that reads "B. W. Bunting". The signature is written in a cursive style with a period at the end.

Ben Bunting  
**Acting Manager – Fast-track Operations**

**Table A: Stage 1 analysis**

Project Name	Applicant	Project Area	
Project details	Simplicity Living – Te Pūtahi Ladies Mile	Simplicity Living Limited	
Project description	<p>The project is to construct and establish an urban development in Frankton, Queenstown, on approximately 10 hectares of land.</p> <p>The project involves:</p> <ol style="list-style-type: none"> <li>approximately 1,100 residential units, across a mix of three storey walk-up apartments and apartment buildings of five to seven storeys</li> <li>community facilities, including community rooms, open spaces and parks, and onsite car parking</li> <li>a development lot intended to accommodate local commercial and retail activities</li> <li>new internal roads within the site</li> <li>the construction of a signalised intersection and bus lane on State Highway 6</li> <li>the provision of new, and upgrades to existing, three waters infrastructure, including stormwater management, water supply, and wastewater services, both internal and external to the site</li> <li>fee simple subdivision to create development lots, roads, and a park to vest in Council</li> <li>unit title subdivision of the walk up and apartment buildings</li> <li>associated bulk earthworks to facilitate the development.</li> </ol> <p>The applicant seeks the following approvals via the fast-track approvals process to authorise the project, including some approvals sought at this stage on a precautionary basis, subject to further investigations prior to any substantive application:</p> <ol style="list-style-type: none"> <li>resource consents under the Resource Management Act 1991 (RMA) as described in section 42(4)(a) of the Fast-track Approvals Act 2024 (the Act)</li> <li>concessions under the Conservation Act 1987 as described in section 42(4)(e) of the Act</li> <li>approvals under the Reserves Act 1977 as described in section 42(4)(e) of the Act</li> <li>wildlife approvals under the Wildlife Act 1953 as described in section 42(4)(h) of the Act.</li> </ol>		
Consultation undertaken	As required by section 11, the applicant has consulted with:		
	<p><i>Relevant local authorities</i></p> <ul style="list-style-type: none"> <li>Queenstown Lakes District Council (QLDC)</li> <li>Otago Regional Council (ORC)</li> </ul>	<p><i>Relevant iwi authorities, hapū and Treaty settlement entities</i></p> <ul style="list-style-type: none"> <li>Te Rūnanga o Ngāi Tahu</li> <li>Te Rūnanga o Moeraki</li> <li>Kati Huirapa Rūnaka ki Puketeraki</li> <li>Te Rūnanga o Ōtākou</li> <li>Hokonui Rūnanga</li> <li>Waihōpai Rūnaka</li> <li>Te Rūnaka o Awarua</li> <li>Te Rūnanga o Ōraka-Aparima</li> </ul>	<p><i>Relevant administering agencies</i></p> <ul style="list-style-type: none"> <li>Department of Conservation (DOC)</li> </ul>
Section 22 assessment criteria			
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	<p><i>The Minister <u>must</u> consider a relevant Government policy statement (GPS) [s22(1A)]</i>  The only current GPS is the Government Policy Statement on Grocery Competition. This project includes a development lot intended to accommodate local commercial and retail activities. However, at this stage, there is no clear indication that these activities would include a supermarket development or grocery-related activities, therefore we consider there to be no GPSs relevant to your decision.</p> <p><i>The Minister <u>may</u> consider any of the following matters, or any other matters the Minister considers relevant.</i></p> <p>The applicant considers the project, being an urban development in Queenstown, is a development or infrastructure project that would have significant regional benefits, for the reasons outlined below.</p> <p><i>Will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure [s22(2)(a)(ii)]</i>  The applicant proposes to fund and deliver upgrades to Council's wider three-waters network, providing additional infrastructure capacity to support development within the Te Pūtahi Ladies Mile Plan area. The applicant considers these upgrades will enable growth beyond the boundaries of the project area and deliver broader public benefit by supporting development of the surrounding rezoned area.</p> <p>The applicant further states that the infrastructure required to service the project meets the definition of regionally significant infrastructure under the QLDC Proposed District Plan. While some infrastructure relates to project-specific water supply, wastewater, and stormwater servicing, the applicant notes that the project also includes trunk infrastructure assets that are intended to be vested in Council, form part of the district's municipal infrastructure, and be integrated into the wider municipal network, which the Plan expressly recognises as regionally significant infrastructure.</p> <p><i>Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [s22(2)(a)(iii)]</i></p>		

	<p>The applicant states that the project will meet this criterion by enabling a substantial new urban neighbourhood that will materially contribute to meeting projected housing demand in the Queenstown Lakes District. The applicant considers that the scale and delivery model will significantly increase housing supply and choice, with the project delivering approximately 1,100 permanent rental homes, equivalent to around 4.7 years of rental supply based on historic district growth. The applicant states that the economic assessment identifies the project as likely the largest single addition to the district's rental stock, supporting regional housing supply, diversity and affordability objectives.</p> <p>The applicant considers that the project represents a well-planned and integrated extension of the urban environment, enabled by existing zoning and supported by coordinated infrastructure investment, and is consistent with the direction of the National Policy Statement on Urban Development. The applicant states that the proposed build-to-rent model will ensure all homes remain permanently in the long-term rental market, directly addressing demand for secure rental accommodation and increasing housing choice, particularly through a focus on one- and two-bedroom dwellings, which the applicant notes are in shortest supply within the district.</p> <p><i>Will deliver significant economic benefits [s22(2)(a)(iv)]</i> The applicant states that the project will deliver significant economic benefits, primarily through substantial construction activity and the provision of long-term, secure rental housing that supports the district's workforce. The applicant considers construction to be a key driver of economic activity and notes that the project's scale will generate concentrated benefits within the Queenstown Lakes District, with additional spillover into Central Otago and Southland.</p> <p>The applicant advises that the project has an overall development cost of approximately \$570 million, including around \$431 million in construction costs, and that over the four-year construction period (2026–2030) it is expected to generate approximately \$472 million in local expenditure through the construction sector. The applicant states that the project will support an estimated 3,036 full-time equivalent (FTE) roles nationally during construction, including 2,277 FTEs, with peak employment of 860 FTEs nationally in 2029. Following completion, the applicant notes that the project is expected to support approximately 40–50 permanent FTE roles in property management and maintenance.</p> <p><i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i> The applicant states that the project will meet this criterion by implementing the development framework established through the Te Pūtahī Ladies Mile Plan Variation, which promotes a compact urban form, integrated transport planning, and access to local services. The applicant considers that the project will reduce reliance on private vehicle travel by delivering a local shopping centre, supporting the viability of the wider Ladies Mile commercial centre and future school through early residential density, and enabling walking and cycling for daily needs. The applicant further states that the project incorporates a connected street network, access to high-quality active transport routes, and roading designed to accommodate future public transport, and that its compact, higher-density residential form supports energy-efficient buildings and reduced per-capita emissions, consistent with national direction for well-served urban areas.</p> <p><i>Will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards [s22(2)(a)(viii)]</i> The applicant states that while the project site is not subject to significant natural hazard constraints, the project incorporates features that support climate change adaptation and long-term resilience. The applicant considers that the compact, walkable layout, local shopping centre, and strategically planned location reduce reliance on vulnerable infrastructure and support a more self-sufficient community better able to respond to and recover from the effects of climate change and natural hazard events.</p> <p><i>Will address significant environmental issues [s22(2)(a)(ix)]</i> The applicant states that the project does not directly address any significant environmental issues on the site, as the land is already zoned for urban development and is not subject to major ecological or natural hazard constraints. However, the applicant considers that the project will deliver indirect environmental benefits by concentrating development within an area identified for urban growth, thereby avoiding dispersal into more sensitive environments and supporting efficient use of existing and upgraded three-waters infrastructure. The applicant further states that the project will establish a compact, well-connected neighbourhood with local services, active transport links, and integrated open space that will enhance environmental performance within the surrounding area.</p> <p><i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i> The applicant considers the project aligns with relevant local and regional planning documents, including the Queenstown Lakes Spatial Plan and both the Proposed and Operative Otago Regional Policy Statement, which seek to support social, economic, cultural, and environmental wellbeing through resilient, well-functioning urban areas. The applicant also considers the project gives effect to the objectives of the QLDC Proposed District Plan, particularly the Te Pūtahī Ladies Mile Plan Change, which was introduced to enable substantial residential growth in response to Queenstown's housing pressures. The applicant has provided a high-level assessment of the project's consistency with relevant planning documents in section 5 of their referral application report.</p>		
<p><b>Referring the project to the fast-track approvals process [section 22(1)(b)]</b></p>	<p><i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> The applicant states that referring the project to the fast-track approvals process would facilitate a more timely and cost-effective pathway than under standard processes. The applicant states that, due to the size and complexity of the project, processing through standard RMA pathways would likely place pressure on the QLDC's processing capacity and result in extended timeframes. The applicant considers that the fast-track approvals process provides a more efficient and predictable pathway, including restricted notification, targeted and time-limited opportunities for invited comments, and an anticipated consenting timeframe of around six months, compared with an estimated two to three years under standard processes. The applicant further considers that this approach would enable earlier realisation of the project's benefits while still ensuring appropriate assessment of environmental and planning considerations.</p> <p><i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> The applicant states that the project involves the subdivision and development of land for predominantly residential purposes, with land development works that are typical of those anticipated within the relevant zone. On this basis, the applicant considers that assessment by an expert panel and administering agencies would be comparatively straightforward and efficient, and unlikely to materially affect the efficient operation of the fast-track approvals process.</p>		
<p><b>Minister invites comments</b></p>	<p><i>You must copy the application to, and invite written comments from [s17(1)]:</i></p> <ol style="list-style-type: none"> <li>a. relevant local authorities: <ul style="list-style-type: none"> <li>– QLDC</li> <li>– Otago Regional Council (ORC)</li> </ul> </li> <li>b. the following Ministers: <ul style="list-style-type: none"> <li>– the Minister for the Environment</li> <li>– the Minister for Māori Crown Relations: Te Arawhiti</li> <li>– Minister for Māori Development</li> </ul> </li> <li>c. other relevant portfolio Ministers:</li> </ol>	<p><i>You may copy the application to, and invite written comments from, any other person [s17(5)]:</i></p> <p>We recommend you invite comments from the following additional persons:</p> <ol style="list-style-type: none"> <li>a. the Chief Executive of NZ Transport Agency Waka Kotahi (NZTA) – as the agency responsible for State Highway 6 adjoining the project area, noting the applicant proposes transport upgrades to the state highway to facilitate the project</li> <li>b. Minister for Regional Development</li> <li>c. Minister for Economic Growth.</li> </ol>	<p><i>The Minister may request further information about a referral application from the applicant, the relevant local authorities, or the relevant administering agencies to be provided within the time frame specified in the request.</i></p> <p>We have not identified any further information to be sought at this stage.</p>

	<ul style="list-style-type: none"> <li>– Minister of Conservation – as the project may require approvals under the Reserves Act 1977, the Conservation Act 1987, and the Wildlife Act 1953</li> <li>– Associate Minister of Housing – as the project is for a residential development</li> </ul> <p>d. relevant administering agency:</p> <ul style="list-style-type: none"> <li>– Department of Conservation (DOC)</li> </ul> <p>e. the Māori groups identified in Appendix 3.</p>		
Recommendations			Minister's decision
a.	Note that section 25 of the Act permits you to decline the referral application without inviting comments from the parties under section 17.		Noted
b.	Note that you have not yet provided the application to, nor sought any written comments on it from, the parties listed in section 17(1) but that you are required to do so if you do not decline the application under section 21 of the Act.		Noted
c.	Note that section 17(5) of the Act permits you to forward an application to, and invite written comments from, any other person.		Noted
d.	Note that if comments have been sought and provided within the required time frame you are required to consider it, along with the referral application, before deciding to decline the application.		Noted
e.	Note that section 20 of the Act permits you to request further information from the applicant or relevant local authorities or relevant administering agencies at any time before you decide whether to accept or decline an application.		Noted
f.	Agree to progress the Simplicity Living – Te Pūtahi Ladies Mile project to our Stage 2 analysis (invite written comments and request section 18 Treaty report).		Yes / No
g.	Agree to provide the application to, and invite written comments from: <ul style="list-style-type: none"> <li>i. QLDC and ORC as the relevant local authorities under section 17(1)(a)</li> <li>ii. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development under section 17(1)(b)</li> <li>iii. the Minister of Conservation and the Associate Minister of Housing as the other relevant portfolio Ministers under section 17(1)(b)</li> <li>iv. DOC as the relevant administering agency under section 17(1)(c)</li> <li>v. the parties in Appendix 3 as the identified Māori groups under section 17(1)(d)</li> <li>vi. any parties you are required to invite comments from under section 17(1)(d) and (e) who may be subsequently identified.</li> </ul>		<p>Yes / No</p> <p>Yes / No</p> <p>Yes / No</p> <p>Yes / No</p> <p>Yes / No</p> <p>Yes / No</p>
h.	Agree to provide the application to and invite written comments from the following additional persons under section 17(5): <ul style="list-style-type: none"> <li>i. Chief Executive of NZ Transport Agency Waka Kotahi</li> <li>ii. Minister for Regional Development</li> <li>iii. Minister for Economic Growth.</li> </ul>		<p>Yes / No</p> <p>Yes / No</p> <p>Yes / No</p>
i.	Note that section 19(1) of the Act requires you to obtain and consider a report in relation to the use of public conservation land for the project from the Director-General of Conservation.		Noted
j.	Note that you have agreed to delegate to the Secretary for the Environment your responsibility to send all correspondence, other than to Ministers.		Noted
k.	Agree to send the email to invite written comments from Ministers.		Yes / No

Signed:

Hon Chris Bishop  
Minister for Infrastructure

Date:

## Appendix 1: Statutory framework summary

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1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
  - a. give the document the same or equivalent effect through this process as it would have under any specified Act; and
  - b. comply with any applicable procedural requirements.
3. You must decline a referral application if:
  - a. you are satisfied the project does not meet the referral criteria in s22
  - b. you are satisfied the project involves an ineligible activity (s5)
  - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in s21(5) and even if the application meets the s22 referral criteria.
5. You can decline an application before or after inviting comments under s17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at this initial stage you must copy the application to, and invite written comments from:
  - a. the relevant local authorities
  - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
  - c. any other relevant portfolio Ministers
  - d. the relevant administering agencies
  - e. the Māori groups identified by the responsible agency
  - f. the owners of Māori land in the project area (if applicable)
  - g. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.

**Appendix 2: Application documents for the Simplicity Living – Te Pūtahi Ladies Mile project**

### Appendix 3: List of the Māori groups referred to in section 18(2)

<b>Name of group</b>	<b>Type of group (section of Act)</b>
<b>Te Rūnanga o Ngāi Tahu</b>	Iwi authority (s18(2)(a)); Treaty settlement entity – Ngāi Tahu Claims Settlement Act 1998 (s18(2)(a))
<b>Te Rūnanga o Moeraki</b>	Treaty settlement entity – Papatipu Rūnanga (s18(2)(a))
<b>Kāti Huirapa Rūnaka ki Puketeraki</b>	Treaty settlement entity – Papatipu Rūnanga (s18(2)(a))
<b>Te Rūnanga o Ōtākou</b>	Treaty settlement entity – Papatipu Rūnanga (s18(2)(a))
<b>Hokonui Rūnanga</b>	Treaty settlement entity – Papatipu Rūnanga (s18(2)(a))
<b>Waihōpai Rūnaka</b>	Treaty settlement entity – Papatipu Rūnanga (s18(2)(a))
<b>Te Rūnanga o Awarua</b>	Treaty settlement entity – Papatipu Rūnanga (s18(2)(a))
<b>Te Rūnanga o Ōraka-Aparima</b>	Treaty settlement entity – Papatipu Rūnanga (s18(2)(a))
<b>Aukaha</b>	Other Māori group with relevant interests (s18(2)(k))
<b>Te Ao Mārama Incorporated</b>	Other Māori group with relevant interests (s18(2)(k))