

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

<b>Project name</b>	<b>Simplicity Living – Te Pūtahi Ladies Mile FTAA-2603-1203</b>
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<b>1. Contact Details</b>			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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<b>2. Please provide your comments on this application</b>
<p>Thank you for your invitation to provide written comments on the application for referral of the Simplicity Living – Te Pūtahi Ladies Mile 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 at the Otago Regional Council (Council). Please see below comments on this application.</p> <p>It should be noted that applications of this manner can be processed under the RMA pathway, but the ORC has no objection to this being processed under the Fast Track Approvals Act should it be referred.</p>

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.

### **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:** ORC confirms it is not aware of any 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:**

ORC confirms there are no 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.

**Query 3 – Ineligible activity**

**Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act).**

**Response:**

ORC confirms there are no activities proposed by the applicant that prohibited under its Regional Plans.

**Query 4 – reasons to decline**

**Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21 of Act).**

**Response:**

ORC is not aware of any reasons to decline a referral application.

**Other Matters**

Please find attached the additional comments on the referral application from ORC in Appendix 1. These comments reflect ORC's preliminary feedback on the referral application and outline several matters to be addressed in a substantive application.

## **Appendix 1 - ORC Referral Application Comments**

### **Introduction**

The referral application was reviewed by the Consents, Compliance and Transport Teams, who have provided the following comments. These are only preliminary comments, and a full assessment will be made if the application is referred.

### **Consent and Compliance Teams comments**

The Consents Team agree that resource consents are required for activities associated with the construction earthworks being a land use consent and discharge permit in accordance with rules the Regional Plan Water for Otago (RPW).

For a substantive application involving earthworks, the ORC expects the following documentation as a minimum:

- Detailed earthworks staging plan;
- Environmental Management Plan prepared by a recognised SQEP; and
- Erosion and Sediment Control Plan prepared by a recognised SQEP.

The applicant has also noted that an application to discharge stormwater from the site long term, and also to discharge contaminants to air during construction is required. In most cases these types of activities are permitted under Rules 12.B.1.8 of the RPW (stormwater) and Rule 16.3.13.1 of the Regional Plan Air for Otago (discharge to air). The applicant will need to confirm if it can meet the requirements of the permitted rules.

The site is not listed on the ORC's HAIL register but absence from the register does not necessarily mean that the property is not contaminated, just that no information exists on the database. Because the current land use is agricultural, there's a chance that HAIL activities have occurred e.g. bulk storage or use of persistent pesticides, agrichemicals, livestock dips, fuel storage etc. It is suggested the applicant engage a contaminated land SQEP, and at a minimum provide a PSI (to verify the likelihood of HAIL activities at the site), or a combined PSI/DSI (if the PSI identifies any likely HAIL activity on the land). Depending on what the investigation finds, other applications under the Regional Plan Waste for Otago maybe required.

### **Transport comments**

As the public transport authority for Otago, Otago Regional Council's (ORC) responsibilities as per the Land Transport Management Act 2003 include:

- Planning public transport networks
- Designing, procuring and funding public transport services
- Influencing land use via regional policy statements and regional plans developed in accordance with the Resource Management Act 1991

ORC recognises Simplicity Living's Ladies Mile Queenstown Urban Development fast-track application as a project that will generate material transport demand on the Whakatipu network

and contribute to public transport infrastructure upgrades within the Te Pūtahi Ladies Mile. In fulfilling the responsibilities above ORC provides the following comments:

- We advise the design of the future east-west collector road and the collector road/ Lower Shotover Road intersection be futureproofed to accommodate an articulated 18-metre public transport bus. While future public transport network plans do not currently include using this collector road, this may change over time. Following the Queenstown Public Transport Business Case's recommendation to transition to articulated buses, ORC will consider operating these vehicles on the Whakatipu network in the medium- to long-term. We note this comment is captured in the '19 March 2026 - Teams Meeting re Transport Matters' summary within the Consultation Report (Appendix 19).
- Section 5.2 of the Transport Memorandum (Appendix 11) does not define the party responsible for delivering the Stalker Road northbound bus priority lane to SH6.
- The only transport infrastructure mentioned in the programme phasing of the Project Delivery and Timeframe Report (Appendix 4) is the internal roading network. We would expect to see phasing of the developer-funded external roading infrastructure as well, such as the SH6 bus priority lane. If the phasing is not finalised at the time of application, this should be noted and indicative timeframes should be included if possible.

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

<b>Project name</b>	Simplicity Living – Te Pūtahi Ladies Mile (Referral Application)
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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.			
<b>Organisation name (if relevant)</b>	Queenstown Lakes District Council (QLDC)		
<b>*First name</b>	Fiona		
<b>*Last name</b>	Blight		
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<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	s 9(2)(a)
<b>*Email</b>	s 9(2)(a)		

2. Please provide your comments on this application	
<b>A. Summary of QLDC Comments</b>	
<i>Strategic Context</i>	
<p>Queenstown Lakes District is experiencing unprecedented growth pressures, with high levels of housing construction occurring across the district’s live zoned land and in areas identified in the District’s Spatial Plan. This growth is materially outpacing the provision of enabling infrastructure, particularly transport (state highways, local roads, and public transport) and wastewater and water services. The use of the Fast-track Approvals Act (FTAA) is compounding these pressures, with the number and scale of fast-track applications located within the District representing a level of development pressure that is both unprecedented and disproportionate to the districts size, its resourcing and infrastructure capacity. The FTAA applications also include many developments at greater density or in unanticipated locations without clear alignment with, or funding for, wider network transport, waste and water infrastructure.</p> <p>As a result, development in the district approved under the FTAA is unlikely to be adequately serviced by existing or planned infrastructure. Without a coordinated, funded, and staged infrastructure response, this will exacerbate capacity constraints, undermine efficient delivery, and lead to wider adverse effects, including network disruption and regional economic impacts. It will also constrain the delivery of housing and development anticipated through the District Plan and (in the medium and</p>	

long term) Spatial Plan by diverting limited infrastructure capacity and investment from planned growth areas.

Allowing development to proceed outside of a coordinated, infrastructure-led framework—particularly in a high-growth area where substantial capacity has already been strategically planned—undermines the ability to deliver well-functioning urban environments. It risks entrenching inefficiencies, constraining future infrastructure investment, and precluding the delivery of integrated, high-quality development consistent with nationally and internationally recognised best practice. In short time, this will erode the District’s capacity to accommodate growth in a sustainable and economically effective manner.

Unplanned development of this nature has the potential to significantly compromise the District’s ability to function effectively, with consequences that extend well beyond local effects. Queenstown Lakes is a critical component of New Zealand’s tourism economy, and poorly coordinated growth risks undermining the quality, accessibility, and resilience of infrastructure that supports both residents and visitors. This creates material risks for New Zealand’s international reputation as a premier tourism destination and for the performance of the wider tourism sector.

### ***Summary of Key Proposal Matters***

This comment sets out Queenstown Lakes District Council’s (QLDC) consolidated feedback, informed by input from relevant Council departments and external advisors across urban design, parks and recreation, property and infrastructure, strategy and policy, and planning (refer appendices) for the Simplicity Living – Te Pūtahi Ladies Mile Project (Project). The comments address matters relevant to the Minister’s decision under section 21 of the Fast-track Approvals Act (FTAA).

The Simplicity development is thankfully within a planned Priority area identified in the QLDC Spatial Plan which is a step in the right direction. However, there are critical matters that require work to ensure a reasonable development, adding to Regional economic benefits while mitigating real and significant adverse effects on the environment, the community and the District. The Project has the potential to contribute to housing supply in Queenstown, including the provision of long-term rental housing. It is being considered within the context of the Te Pūtahi Ladies Mile Structure Plan and Zone provisions, which were confirmed not too long ago by the Minister for the Environment through the Streamlined Planning Process (SPP) following public consultation, and which establish clear expectations regarding land use, density, development staging, and infrastructure delivery.

The Te Pūtahi Ladies Mile provisions reflect specific detail on where different types of development should occur within the zone, to what bulk and height, and what level of development triggers the requirement to construct social and transport infrastructure. The community has expectations that development will occur in accordance with what the Zone anticipated. This Project is not aligned with what the Zone anticipated in this location. A key concern for Council is that allowing this Project to depart from the Zone’s anticipated outcomes for this site could set a precedent for similar departures in Ladies Mile, potentially resulting in a level of development that exceeds planned capacity and undermines the transport and three waters infrastructure framework established through the SPP. While more rental housing is positive, the wider supporting infrastructure (transport, 3 waters and community parks and facilities) is not yet formally confirmed with Simplicity.

The Project's (in)consistency with local or regional planning documents, including spatial strategies is particularly significant in light of the planning and community context for the Zone.<sup>1</sup> Several aspects of the proposal are significantly misaligned with the Te Pūtahi Ladies Mile Structure Plan and the Te Pūtahi Ladies Mile Zone (Zone) provisions<sup>2</sup>:

- **Transport uncertainty:** Key transport upgrades, staging, approvals, and funding remain unclear/unconfirmed.
- **Education gaps:** School capacity triggers of the Zone are likely exceeded, but delivery and funding of education facilities are uncertain and not proposed under this project, exacerbating the pressure on Shotover Primary school and Wakatipu High school.
- **Urban design:** Height affecting views to ONL/ONF<sup>3</sup>, provision of open space, road layout, and visitor parking are all concerns.
- **Parks and community facilities concern:** No suitable public open space is proposed, and the higher density would add pressure to the wider open space network and community facilities. The concern is not just the amount of open space, but that the proposed park land would be in the wrong place and less usable.

Three waters generally appear manageable for the development but is still subject to detail and formal agreements: Water, wastewater, and stormwater servicing appear potentially achievable, but depend on further technical review, staged delivery, and formal agreements.

Technical comments to support the above are briefly summarised further below and are attached in full as appendices.

Should the Minister approve this referral application, then QLDC requests that the following matters require clear resolution and supporting evidence from the applicant as part of their lodged substantive application:

#### 1. Transport Infrastructure

- A comprehensive and integrated transport solution agreed with QLDC and NZTA, including measures to be implemented to reduce car dependency by residents of the development
- Consistency with PDP requirements for staging development with transport infrastructure including showing how the following is achieved:
  - the delivery and timing of transport infrastructure (the Stalker Road northbound bus priority lane south of State Highway 6, and partial delivery of the westbound bus land on State Highway 6)
  - the removal of Collector Road A, as it was shown on the Structure Plan
- Demonstration of network performance and technical feasibility
- A staged delivery programme aligned with development timing (consistent with TPLM Zone Rules 49.5.39 Transport infrastructural works)

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<sup>1</sup> Section 22(2)(x) of the FTAA.

<sup>2</sup> Section 22(2)(x) of the FTAA.

<sup>3</sup> Outstanding Natural Landscape and Outstanding Natural Feature.

## 2. Education Infrastructure

- Clear response to education-related development triggers (including the 1,100-dwelling threshold)
- Provision for, or confirmation of, education facilities through evidence of coordination with relevant Ministries

## 4. Three Waters Infrastructure

- Demonstration of capacity and servicing strategy for water, wastewater, and stormwater
- Evidence of timely and feasible delivery
- Agreement with QLDC for the 3 waters infrastructure to be delivered, including any development contributions or other relevant mechanisms

## 5. Staging and Integration

- A comprehensive staging plan linking development to infrastructure delivery in accordance with the Structure Plan

## 7. Parks and Community Facilities

- A local park on flat land that meets the Future Parks Provision Plan criteria and is consistent with the Structure Plan, or
- Agreement to pay full reserve land development contributions to QLDC instead.

## 8. Planning Alignment

- Seek to align the Project more with the Zone provisions and the Structure Plan as far as practicable including showing how the following is achieved:
  - free public access through the site is enabled along key active travel desire lines

## 9. Effects Management

- Assessment of cumulative and downstream effects, particularly on:
  - transport networks
  - waste water and water infrastructure capacity
  - height breaches potentially impacting views on ONF/ONL have been minimised
- Identification of measures to appropriately avoid, remedy, or mitigate adverse effects

### **B. Section 17 Matters**

**Section 17(3)(a)(i)** QLDC considers that there are no applications that have been lodged that would be competing applications if a substantive application for the project were lodged.

**Section 17(3)(b)** There are a number of issues with the Project that are discussed in this comment and attached technical reports relevant to the Minister's decision under section 21 on the referral.

### **C. Section 22 Assessment – Criteria for Assessing Referral Application**

Section 21(1) of the FTAA requires that a project meets the criteria in section 22. QLDC's position on s22 is set out below.

**22(1) (a) Does the project have significant regional or national benefits?**

QLDC acknowledges that the proposal delivers housing benefits in the form of long-term rental housing for a community where housing affordability is a significant issue. The site is within a new zone purposed for housing development in the district, albeit as outlined in these comments QLDC does have some concerns. QLDC has not undertaken a peer review of the applicant's economic assessment, including the regional or national significance of any benefits, and therefore is not providing further specific comment on this matter.

**22(1) (b) (i) Would referring the project facilitate delivery in a more timely and cost-effective way?**

If the proposed development conformed more to the Zone provisions, there is strong likelihood that a normal resource consent process under the Resource Management Act 1991 (RMA) would not be too problematic. As currently proposed, the proposed height of the development in particular would very likely trigger a publicly notified process under the RMA because this height is not anticipated (by the Zone or community) in this location in the Zone, but rather it is anticipated at another location at the opposite end of Zone.

**22(1) (b) (ii) Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?**

Potentially. This project relies on significant unresolved infrastructure questions and there is no formal agreement with QLDC in place yet on an agreed solution. The solution requires extensive coordination across agencies (e.g. NZTA, QLDC, ORC, Ministry for Education), that could result in high uncertainty or rework during the fast-track process unless these are resolved prior to lodging a substantive application.

**22(2)(a)(i) Has the project been identified as a priority in any government or sector plan or strategy?**

The project has not been identified as a priority for a central government sector plan or strategy.

**22(2)(a)(ii) Will the project deliver new or support existing regionally / nationally significant infrastructure?**

No regionally or nationally significant infrastructure is proposed.

QLDC notes that no formal agreements are in place for transport infrastructure for the project at this stage (refer to Property and Infrastructure Technical Memo, paragraph 5.1).

All three waters infrastructure required to service the development—including connections to Council's reticulated wastewater network and the Shotover Treatment Plant, as well as connection to the new water reservoir to be constructed to service the Ladies Mile area—is proposed to be developer-funded and delivered by the applicant (refer Property and Infrastructure Technical Memo, paragraph 6.1). But no formal agreement for this is yet in place.

**22(2)(a)(iii) Will the project increase housing supply or contribute to a well-functioning urban environment?**

While the project proposes to increase housing supply (particularly long-term rental options), QLDC considers that it may not necessarily contribute to a well-functioning urban environment in its current form. The development itself is proposed to be essentially a private community that does not share its amenities with the wider community.

Additionally, critical supporting infrastructure—particularly transport and the anticipated school to be established in the Zone—would not be delivered as part of this development. The development appears to trigger the Zone provisions requiring a school, but no evidence has been provided to QLDC to show that discussions with the Ministry for Education are underway regarding the development of a school. These components are key to meeting the test of a well-functioning urban environment. Without them the developer will concentrate on all things that provide benefit to their development model while not putting the hard yards in to respond to the impact of following their significant development aspirations. Not managing the known adverse effects that will arise without appropriate and required transport and education infrastructure will result in an acutely unfair and naturally unjust outcome for the community and will significantly impact the movement of tourists in the District given the proximity to state highway 6 (which runs through the Ladies Mile area).

**22(2)(a)(iv) Will the project deliver significant economic benefits?**

As noted above, Council has not undertaken a peer review of the applicant's economic assessment to quantify the economic benefits and therefore is not providing further specific comment on this matter. Should the Minister require this provisions in the legislation allow for peer reviews to be commissioned.

**22(2)(a)(v) Will the project support primary industries (e.g. viticulture) in Queenstown-Lakes District?**

No. The project is a build-to-rent housing development and does not include a primary industry component.

**22(2)(a)(vi) Will the project support development of natural resources?**

No. The project will not support the development of natural resources.

**22(2)(a) (vii) Will the project support climate change mitigation, such as whether it reduces or removes greenhouse gas emissions?**

No. The project as proposed does not support climate change mitigation, given the concerns regarding the potential level of car dependency (set out in the technical memos and peer reviews attached), particularly if public transport components are not adequately realised.

As noted in the Urban Design Peer Review (refer to paragraph 27), further information is required to demonstrate how the proposal will meet the Zone requirement for design initiatives that reduce carbon emissions.

No car-sharing measures are proposed, and the development does not include any explicit emissions reduction or removal components, despite these being identified in the TPLM Structure Plan. It would be expected that this would form part of any substantive application should the project be referred.

***22(2)(a)(viii) Will the project support climate change adaptation or recovery from events caused by natural hazards?***

No. The project does not support climate change adaptation, or recovery from events caused by natural hazards, as this has not been addressed in the proposal.

***22(2)(a)(ix) Will the project address significant environmental issues?***

No.

***22(2)(a)(x) Is the project consistent with local or regional planning documents, such as spatial strategies?***

While the Project is located within land identified for development within the Te Pūtahi Ladies Mile Zone (TPLM), aspects of the proposal are not consistent with the TPLM Structure Plan and associated Zone provisions.

The Structure Plan establishes clear expectations for development intensity, spatial distribution, staging, and the integration of infrastructure. As currently presented, the proposal departs from these expectations, particularly in relation to the alignment of development with infrastructure provision and the operation of infrastructure-linked triggers (including transport and education).

Accordingly, while the site sits within a planned growth area, the proposal demonstrates a degree of inconsistency with the intended development outcomes for this location.

***22(2)(b) Are there any other relevant matters to consider?***

No. The proposal does not involve any prohibited activity and there are no concerns regarding the applicant's compliance history.

***21(5) Any reasons to decline the application?***

The Project proposal does not involve any prohibited activity and there are no concerns regarding the applicant's compliance history.

However, Council considers that if the identified transport, open space and education issues are not adequately addressed, the Project may give rise to significant adverse effects on the built environment under section 21(5)(c) of the FTAA.

**D. Consultation / Notification under s11(1)(b) and (c)**

Specific engagement on the FTAA referral application has not yet taken place with QLDC. Rather QLDC has held a number of meetings and communications with the applicant through an RMA pre-application resource consent process (for a different development typology to the one submitted for

referral), and through Ladies Mile developer infrastructure engagements (as set out in the QLDC Property and Infrastructure Technical Memo).

No section 11(1)(b) notice was given to QLDC. Presumably therefore Simplicity is relying on consultation undertaken before the FTAA second commencement date (of 31 March 2026), with s10(4) of Schedule 1 then requiring the Applicant to “finish their pre-commencement consultation”. In terms of Schedule 1 s10(4) QLDC notes that this may not have been met by the applicant prior to lodging its referral application.

As above the applicant has been having meetings and communications with QLDC *outside* of the FTAA process. On 13 March 2026 the applicant requested consultation with QLDC through its website FTAA consultation portal, and as this was before 31 March 2026 no s11(1)(c) notice was included, and in accordance with Schedule 1 s10(1) and s10(2) QLDC is agreeable that consultation on FTAA had commenced before 31 March 2026 by virtue of the request through the QLDC FTAA consultation portal. As above, the referral application is different to the application presented to QLDC through the RMA pre-application process. On 25 March 2026 the applicant requested from the QLDC FTAA team a written acknowledgement of the consultation with Council to date, but as that consultation was for a different application under an RMA pre-application process QLDC declined this request as it has not been FTAA consultation on this development, however did assure the applicant that QLDC would provide continuity in people (and therefore some base knowledge) between the RMA and FTAA processes.

#### **E. Context Information: Establishment of the Te Pūtahi Ladies Mile Zone**

The Te Pūtahi Ladies Mile Plan Zone became operative in 2024, rezoning approximately 120 hectares of rural residential land along the State Highway corridor to the TPLM Zone in accordance with the Structure Plan. The Zone provides for a range of housing typologies and densities, including higher-density development, to help address the region’s housing shortage.

The Variation was progressed through the Streamlined Planning Process (SPP) to expedite delivery. When applying to the Minister, QLDC requested full public notification to ensure the process enabled meaningful community participation.

Given known transport constraints along the Ladies Mile corridor, the Variation was subject to significant scrutiny. Community input played a substantial role in shaping the final provisions, with the Council Independent Hearings Panel incorporating requirements to address transport effects and network performance.

Community input materially influenced the final Zone and Structure Plan prior to Ministerial approval. This included changes to density provisions (with transport-related restricted discretion), removal of the central stormwater scheme, increased green space, and the introduction of transport trigger rules, all of which are embedded in the Zone now.

In this context, elements of the current Project depart from the outcomes established through the Structure Plan and SPP Variation. There is a risk that, as currently proposed, the Project may not achieve the intended outcomes and could undermine the recently adopted, community-informed Zone.

## **F. Technical advice from QLDC Expert Staff and Consultants**

QLDC has relied on independent urban design and planning peer reviews, as well as input from three of Council's internal teams: Property and Infrastructure, Parks Planning and Open Space, and Strategy and Policy. These reviews collectively inform Council's comments and are attached to this response. They are summarised below.

### ***F.1 Planning Peer Review***

The Simplicity proposal has been supported by a Referral application package that generally correctly identifies the planning framework relevant to the proposal, and correctly summarises the likely consents required and the key reasons for those.

From a planning perspective, there are several key 'non-compliances' with the planning framework that are more significant than others and which have impacts on whether the proposal can contribute to a well-functioning urban environment and achieve consistency with the planning framework that applies to the application site.

These non-compliances principally relate to the development height, delivery, and timing, of transport and educational infrastructure to support future residents, and the degree to which Structure Plan outcomes are achieved through the alternatives offered in the proposal.

These matters are highlighted as they will require addressing by the applicant, whether in a Substantive application, or in a conventional resource consent application.

### ***F.2 Urban Design Peer Review***

QLDC commissioned an independent urban design review to assess the Project's alignment with the TPLM Structure Plan. The proposal is positive in terms of housing supply—delivering significantly higher density than anticipated. The urban design review identified that this level of density places considerable pressure on transport and three waters infrastructure, open space, and the wider Structure Plan framework.

The most critical issues identified as inconsistencies with the Structure Plan are:

- the delivery and timing of transport infrastructure (the Stalker Road northbound bus priority lane south of State Highway 6, and partial delivery of the westbound bus land on State Highway 6);
- the removal of Collector Road A, as it was shown on the Structure Plan;
- education infrastructure— with a High School trigger in the TPLM Zone Rule 49.4.6 for 1,100 dwellings,
- provision of open space;
- free public access through the site is enabled along key active travel desire lines
- height breaches potentially impacting views on ONF/ONL

These matters require resolution and will need to be addressed by the applicant through any subsequent substantive application.

### ***F.3 QLDC Property and Infrastructure Technical Memo***

Overall, the proposal reflects early delivery of transport enabling works and developer-funded three waters infrastructure consistent with the Te Pūtahi Ladies Mile planning framework, however there is no formal agreements in place. While broadly aligned with Council's strategic direction, key aspects of design, approvals, and delivery arrangements remain subject to confirmation through detailed design and any substantive approval processes.

Simplicity Living has undertaken extensive engagement with Council officers as part of ongoing planning and coordination work between Council and developers for the Ladies Mile area (a major growth and residential development corridor in Queenstown). This engagement has covered transport, three waters servicing, staging, and how development will connect with existing and planned Council and NZTA infrastructure.

Three waters infrastructure (water supply, wastewater, and stormwater) is proposed to be delivered by the applicant in accordance with QLDC standards and specifications. Council has engaged WSP to independently peer review the three waters design.

From a transport perspective, engagement has occurred between the applicant, NZTA, Otago Regional Council, and QLDC in relation to the State Highway 6 interface, including the upgrade of the Lower Shotover Road and Stalker Road intersection to a signalised intersection delivered by the applicant. Engagement has also addressed bus priority, bus stop provision, and future public transport routing along SH6 and Stalker Road. As above there is no formal agreements in place yet.

### ***F.4 QLDC Strategy and Policy Technical Memo***

The proposal is broadly supported in principle as it is within the Te Pūtahi Ladies Mile Priority Development Area and supports the delivery of a much-needed housing product and tenure.

The critical issue that needs further consideration is the cumulative impact on the wider transport network, particularly when this proposal is considered with other consented and proposed growth in the Whakatipu Basin. Key transport interventions rely on NZTA funding and delivery, and that commitment has not been confirmed.

This proposal, together with other consented development, takes Te Pūtahi Ladies Mile beyond the secondary school trigger, and will bring forward the need for the construction of the primary school. Ministry of Education (MoE) funding and delivery also has not been confirmed.

Any substantive approval should be contingent on confirmation of a funded and coordinated transport and educational response, including NZTA and MoE commitments where required, with clear staging and trigger mechanisms aligned to cumulative growth.

### ***F.5 QLDC Community Services – Parks and Open Space Planning Technical Memo***

While the Structure Plan provides some flexibility as to the precise location of local parks, the Simplicity Living proposal seeks to relocate open space areas to land that is constrained by topography and existing stormwater infrastructure. As a result, the Project does not provide sufficient or suitable open space. The proposed relocation of the Local Park is a poor outcome as the site is not

universally accessible, will be shaded in winter and is constrained by stormwater infrastructure. The increased density and lack of public ownership of other open spaces will place additional pressure on the wider Ladies Mile Te Pūtahi Structure Plan open space network.

In summary, the Project should either provide a suitable local park on flat land that meets the criteria in the *Future Parks Provision Plan* (refer to Parks and Open Spaces Technical Memo 3.5-3.7) or confirm that full Reserve Land development contributions will be paid to QLDC in lieu of delivering a Local Park that meets the required criteria.

**List of Appendices:**

- **QLDC Planning Peer Review**
- **QLDC Urban Design Peer Review**
- **QLDC Property and Infrastructure Technical Memo**
- **QLDC Strategy and Policy Technical Memo**
- **QLDC Parks and Open Spaces Technical Memo**

**Managers signoff**



**Fiona Blight**  
**Manager Resource Consents**  
Planning and Development  
Queenstown Lakes District Council

20 May 2026

# Technical Memo

<b>To:</b>	QLDC Resource Consent Team
<b>From:</b>	Robert Galvin (Programme Manager Growth Areas, P&I)
<b>Date:</b>	Wednesday, 20 May 2026
<b>cc:</b>	Tony Avery (General Manager Property & Infrastructure)
<b>Subject:</b>	<b>Fast Track Approvals Act 2024</b> <b>Simplicity Living Te Pūtahi Ladies Mile: Referral Application (FTRA2602) Transport and Three Waters technical comment – s17 comment</b>

## 1. Executive Summary

- 1.1. This memorandum provides Property and Infrastructure (**P&I**) input to inform Queenstown Lakes District Council's (**QLDC or Council**) response under section 17 of the Fast Track Approvals Act 2024 (**FTAA**) in respect of the Simplicity Living Te Pūtahi Ladies Mile Fast Track referral application (**Project**).
- 1.2. The memorandum addresses transport, three waters servicing, and infrastructure delivery matters relevant to Council's statutory responsibilities. It reflects the Project as described through engagement with the applicant and the technical material provided with the referral application, in particular Appendix 6 *Engineering Infrastructure Servicing Technical Memorandum* and Appendix 11 *Transport Memorandum (Transport Assessment)*. The assessment relies on the information supplied by the applicant and does not adopt assumptions, conditions, or delivery mechanisms that have not been identified by the applicant.
- 1.3. Overall, the proposal reflects early delivery of transport enabling works and developer-funded three waters infrastructure consistent with the Te Pūtahi Ladies Mile planning framework. While broadly aligned with Council's strategic direction, key aspects of design, approvals, and delivery arrangements remain subject to confirmation through detailed design and any substantive approval processes.
- 1.4. Simplicity Living has undertaken extensive engagement with Council officers as part of ongoing planning and coordination work between Council and developers for the Ladies Mile area (a major growth and residential development corridor in Queenstown). This engagement has covered transport, three waters servicing, staging, and how development will connect with existing and planned Council and NZTA infrastructure.
  - Three waters infrastructure (water supply, wastewater, and stormwater) is proposed to be delivered by the applicant in accordance with QLDC standards and specifications. Council has engaged WSP to independently peer review the three waters design.
  - From a transport perspective, engagement has occurred between the applicant, NZTA, Otago Regional Council, and QLDC in relation to the State Highway 6 interface, including the upgrade of the Lower Shotover Road and Stalker Road intersection to a signalised intersection delivered by the applicant. Engagement has also addressed bus priority, bus stop provision, and future public transport routing along SH6 and Stalker Road.

## 2. Qualifications and Experience

- 2.1. **Robert Galvin** is the Programme Manager (Growth Areas) in the Strategy and Infrastructure Planning Team within the Property & Infrastructure Department at QLDC. His role involves coordinating growth-related planning processes and integrating multidisciplinary inputs across Council's strategic and infrastructure planning frameworks. He has extensive experience in infrastructure programme and project delivery, asset management, procurement, and facilities management, and holds an MBA and a Postgraduate Certificate in Business. He is also a Graduate of the City & Guilds Institute (GCGI) and a Chartered Member of Engineering New Zealand (CMEngNZ).
- 2.2. Robert's role has been to coordinate and present material prepared by technical experts Richard Powell, Tony Pickard, and Monique Barnes. This function is separate from his involvement in engagement with developers on Ladies Mile, which includes coordination of infrastructure and broader QLDC activities.
- 2.3. **Richard Powell** is the Infrastructure Development Engineering Manager at QLDC, a position he has held since 2019. He has 17 years' professional experience in civil engineering, including 15 years in the Queenstown Lakes District. His responsibilities include assessing how proposed developments can be serviced by existing and planned infrastructure, considering network capacity, known constraints, and scheduled upgrade works. He holds a degree in Land Planning and Development from the University of Otago.
- 2.4. **Tony Pickard** has been the Strategy Planning Manager (Transport) at QLDC since January 2018, having joined the Council in 2014. He brings 20 years' professional experience as a planner, spanning consenting, policy, statutory advocacy, and infrastructure work in New Zealand and overseas. His responsibilities include planning and investment for QLDC's transport improvements programme, and he has led transport inputs for urban centre master planning, spatial plans, structure plans, and complex transport business cases for approximately ten years. He holds a BSc (Hons) in Estate Management from Reading University in the United Kingdom.
- 2.5. **Monique Barnes** is a Senior Transport Engineer in the Property and Infrastructure Civil Engineering Team at QLDC, with 12 years' experience across the private and public engineering sectors. Her role includes providing technical assurance for transport projects across the district and ensuring alignment with Safe System principles. Her experience covers transport planning and design, road geometric design, multimodal infrastructure, integrated transport assessments, transport modelling, and Safe System Audits. She holds a BSc in Civil Engineering from the University of the Witwatersrand in South Africa.
- 2.6. All technical authors confirm that they have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. The technical commentaries have been prepared in accordance with that Code. Unless stated otherwise, the opinions expressed are within the respective authors' areas of professional expertise, and no material facts have been omitted that might alter or detract from those opinions.

## 3. Introduction

- 3.1. This memorandum provides P&I advice to support Council's response to the Minister under section 17 of the FTAA for the Simplicity Living Te Pūtahi Ladies Mile Fast Track referral application.
- 3.2. The memorandum focuses on matters within Council's P&I remit, including transport, three waters servicing, and infrastructure delivery considerations, and is informed by engagement with the applicant and the technical material submitted with the referral application.

3.3. The advice is provided in the context of Council's statutory responsibilities, adopted strategies, Long Term Plan commitments, and the Te Pūtahi Ladies Mile planning framework. The memorandum is intended to inform Council's section 17 response and does not constitute a determination of support or opposition to the application.

## **4. Strategic Context**

- 4.1. The Te Pūtahi Ladies Mile area has been identified through spatial planning, structure planning, and recent rezoning as a key growth area for the Queenstown Lakes District. Development within the area is anticipated to support significant residential growth alongside substantial investment in transport and three waters infrastructure.
- 4.2. The planning framework recognises that development in the initial stages of Ladies Mile will require the delivery of infrastructure ahead of corridor wide upgrades by Council or other agencies. This includes State Highway interfaces, public transport enabling works, and three waters trunk infrastructure.
- 4.3. Council, NZTA, and Otago Regional Council have recognised through planning and infrastructure discussions that early development within Ladies Mile may necessitate developer-led delivery of infrastructure to enable growth while broader programmes and funding pathways are confirmed.
- 4.4. From a P&I perspective, the key considerations for early infrastructure delivery are that assets:
  - Are delivered to QLDC and NZTA standards and specifications.
  - Integrate with planned long term network solutions.
  - Do not preclude or constrain future corridor upgrades.
  - Do not transfer unfunded operational, maintenance, or renewal liabilities to Council.
- 4.5. This context informs the assessment of the transport and three waters proposals outlined in the applicant's referral material.

## **5. Transport Commentary**

### **5.1. Engagement carried out to date**

- The applicant has engaged with QLDC, NZTA, and Otago Regional Council on transport matters through the ongoing planning and coordination work for the Ladies Mile area and during preparation of the Fast Track referral application.
- Engagement has focused on State Highway 6 access and intersection form, bus priority, bus stop provision, pedestrian and cycle connectivity, staging, and alignment with the Te Pūtahi Ladies Mile Structure Plan.
- Engagement has also included discussion of interfaces with existing and planned Council and NZTA infrastructure.
- No formal transport approvals for the Project have been granted at this stage. All works within the State Highway corridor remain subject to NZTA approval.

### **5.2. Network assumptions and modelling inputs**

- Traffic volumes recorded for Shotover Road in the applicant's Transport Assessment appear to be underestimated. A two-week survey completed by QLDC in March 2025 indicates higher five-day mid-week peak hour volumes, with approximately 600 vehicles per hour in the morning peak and 580 vehicles per hour in the afternoon peak (compared to 450 vph and 500 in the Transport Assessment).

- Updated traffic volumes should be used in future modelling to ensure that existing demands are appropriately reflected when designing intersections and signal phasing as part of a substantive application.
- The timing of a potential Howards Drive signalised intersection upgrade remains uncertain, as there is currently no confirmed agreement or funding for construction. While the upgrade is referenced in the applicant's material, it is not within the scope of the proposed development. Any reference to a March 2027 completion date for that intersection upgrade should not be relied upon in assessment. This is not expected to materially affect the proposal.

### 5.3. State Highway 6 and Stalker Road intersection

- Appendix 11 outlines a proposal to upgrade the existing SH6 and Stalker Road roundabout to a signalised intersection incorporating Lower Shotover Road movements.
- The proposed upgrade is intended to improve operational control and safety, provide formal pedestrian and cycle crossings, enable access to bus stops on SH6, and support network management during peak periods.
- The intersection is proposed to be designed and delivered by the applicant, subject to NZTA and QLDC technical review and approval. QLDC should be consulted as a key stakeholder on modelling and detailed design, given the effects on Lower Shotover Road, Stalker Road, and the active travel network.
- The works are not anticipated to remove congestion on SH6 but are intended to manage traffic movements more safely and efficiently while providing a range of transport options. Consideration should be given to appropriate speed environments aligned with Safe System thresholds along the State Highway corridor, particularly at intersections and other high-conflict locations.

### 5.4. Public transport and bus priority

- Engagement with Otago Regional Council has focused on bus priority, bus stop provision, and pedestrian and cycle access to support future public transport services along SH6 and Stalker Road.
- Proposed works include bus stops on SH6 and Stalker Road, pedestrian, and cycle connectivity to those stops, and delivery of a westbound bus lane on SH6 to the Shotover Bridge.
- Future public transport assumptions should reference the Otago Regional Council Public Transport Plan 2025 to 2035, which provides updated information on service levels. The previously referenced 15-minute service frequency between Frankton and Arrowtown is likely to be longer term and should be considered when assessing mode share.
- Decisions regarding public transport services, routes, and frequencies remain the responsibility of Otago Regional Council.

### 5.5. Active transport infrastructure

- A 4-metre shared path is proposed along Lower Shotover Road and SH6. In accordance with NZTA pedestrian network guidance, priority should be given to consideration of separated facilities for pedestrians and cyclists, particularly given the anticipated high demand and potential for conflicts between people walking and cycling in a fully developed environment.
- Where shared paths are proposed, supporting justification should be provided. The Structure Plan identifies this corridor as a Major Active Travel Route, which supports provision of separated facilities. Safe System options assessments should be undertaken to determine the most appropriate design.

- A 3-metre shared path is proposed along the new collector road. Given that this route is also identified as a Major Active Travel Route, options for separated infrastructure for pedestrians and cyclists should be considered and demonstrated. The suitability of shared paths in high demand environments should be carefully assessed, supported by Safe System evaluation.
- The provision of infrastructure that supports a shift to public transport and active modes is supported.

#### 5.6. Parking and road design

- Consideration should be given to the effects of providing one car park per dwelling regardless of dwelling size (with three-bedroom dwellings included in the Project), including the potential for overflow parking on the surrounding road network. Where effects are identified, mitigation measures should be demonstrated as part of a substantive application.
- Parking along the new collector road should be avoided to maintain clear and efficient movement for all modes, particularly active transport. Where on-street parking is proposed as an exception, it should be clearly demonstrated that it does not compromise safety, efficiency, or the quality of active mode infrastructure.
- Traffic lane widths should support lower speed environments. Lane widths should not exceed 3.5 metres unless justified, noting ongoing review of Code of Practice requirements. Appropriate tracking and design vehicle assessments should be provided.
- It is understood that the applicant intends to retain the internal road in private ownership. While this approach is not consistent with Section 3.2.8 of the Land Development and Subdivision Code of Practice, it may be appropriate to consider this through a formal deviation process. Any such approach should be supported by an assessment of effects, including consideration of the ability to manage and enforce parking controls within the development.

#### 5.7. Safety and design assurance

- A Safe System approach should be applied across all proposed transport infrastructure. Safe System options assessments are recommended to identify the most appropriate design outcomes for all users.
- A Safe System audit of all proposed transport infrastructure should be undertaken as part of the substantive application to minimise the need for later design changes.

## 6. Three Waters Commentary

### 6.1. Overview

- Since late 2025, QLDC officers have been engaging with Simplicity Living in relation to accelerating construction of the three waters infrastructure required to service the Ladies Mile development area, as described in the Te Pūtahi Ladies Mile Structure Plan. QLDC has funding allocated in the Long-Term Plan for construction of water supply and wastewater schemes to begin in the 2028–29 financial year. To advance infrastructure delivery to meet the needs of the Project, the applicant has taken responsibility for designing and staging the three waters schemes for the anticipated total development potential of the Te Pūtahi Ladies Mile Structure Plan area.
- Following completion and acceptance of the design through independent peer review by WSP, a Developer Agreement will be entered into. Under this agreement, the applicant will be responsible for construction of the three waters schemes, with financial arrangements recognising costs incurred by them for capacity constructed but not utilised by the Project to be detailed in that agreement.

- Appendix 6 to the Application demonstrates that the site is capable of being serviced for stormwater, wastewater, and potable water, subject to staged delivery of internal and external infrastructure.
- All three waters infrastructure required to service the development is proposed to be developer funded and delivered by the applicant in accordance with QLDC standards and specifications. Any additional capacity provided above development requirements will be available for QLDC to allocate to the remainder of the Te Pūtahi Ladies Mile Structure Plan area, with details to be confirmed through a future Developer Agreement. This approach is acceptable to QLDC, and a Collaboration Agreement has already been signed between the parties confirming these intentions.

## 6.2. Wastewater

- The Project is proposed to be serviced via a site-wide gravity reticulation network discharging to trunk wastewater infrastructure within SH6. The servicing strategy includes staged external upgrades, initially utilising available capacity within the existing 375-millimetre wastewater main, followed by construction of a new trunk main to the Shotover Bridge to accommodate the anticipated total development potential of the Te Pūtahi Ladies Mile Structure Plan area. The scope, staging, and timing of these upgrades remain subject to confirmation through detailed design and a finalised Developer Agreement between the applicant and QLDC.

## 6.3. Potable water

- Potable water supply is proposed through an interim connection to the existing main near the Lower Shotover Bridge, followed by an ultimate solution providing a dedicated rising main to the consented Slope Hill reservoir site. This rising main will be sized to service the anticipated total development potential of the Te Pūtahi Ladies Mile Structure Plan area. The scope, staging, and timing remain subject to confirmation through detailed design and a finalised Developer Agreement between the applicant and QLDC.

## 6.4. Stormwater

- Stormwater is proposed to be managed in accordance with the Te Pūtahi Ladies Mile Structure Plan and the QLDC Land Development and Subdivision Code of Practice. Stormwater generated from both the uphill catchment and the development will be captured and disposed of to ground for rainfall events up to and including the 1 percent annual exceedance probability (AEP). In more extreme events that exceed system capacity, excess flows will discharge to the Shotover River via defined overland flow paths. This approach is consistent with the Land Development and Subdivision Code of Practice and is acceptable to QLDC.

## 6.5. Peer review and acceptance

- QLDC has engaged WSP to independently peer review the Project's three waters design. This review will inform any Developer Agreement for construction of trunk services required to service the Te Pūtahi Ladies Mile Structure Plan area that are located outside the development site, referred to as external infrastructure.
- Internal infrastructure required to service individual properties and lots within the Project will remain subject to Council technical approval through Engineering Acceptance and inspection processes. Acceptance will be required prior to vesting of the infrastructure assets.

# 7. Other Infrastructure Considerations

- 7.1. Infrastructure delivered as part of the Project must integrate with future stages of Ladies Mile growth and not constrain long term transport or servicing solutions.

- 7.2. Clear delineation of ownership, maintenance, and operational responsibilities for public and private infrastructure will be required to manage long term risk.
- 7.3. Consideration should be given to the design and operation of solid waste and recycling services for the proposed high-density development.
- 7.4. Waste storage, collection points, and vehicle access should be designed to support safe and efficient servicing and align with QLDC waste management practices.
- 7.5. Early engagement with Council's waste management team is recommended to ensure that proposed arrangements do not create ongoing operational or servicing constraints for Council.

## **8. Conclusion**

- 8.1. The Project reflects the outcomes of substantial engagement with QLDC, NZTA, and Otago Regional Council across transport and three waters matters.
- 8.2. The Project proposes early delivery of transport enabling infrastructure and developer-funded delivery of three waters infrastructure that aligns with the Te Pūtahi Ladies Mile planning framework.
- 8.3. While the Project broadly aligns with the strategic direction for Ladies Mile, detailed design, approvals, and delivery arrangements will require confirmation through a substantive approval stage. The outstanding issues discussed in this memorandum should be addressed in the substantive application.
- 8.4. This memorandum is provided to inform QLDC's section 17 response under the FTAA by identifying P&I considerations relevant to that response.

ENDS

# Strategy & Policy Memo

<b>To:</b>	QLDC Resource Consent Team
<b>From:</b>	Strategic Growth
<b>Date:</b>	Wednesday, 20 May 2026
<b>cc:</b>	Pennie Pearce (General Manager Strategy & Policy)
<b>Subject:</b>	<b>Fast Track Approvals Act 2024 Simplicity Living Fast Track Referral Application FTRA2602 Strategy and Policy - section 17 comment</b>

## 1. Executive Summary

- 1.1. This memorandum provides Strategy and Policy input on the Simplicity Living Te Pūtahi Ladies Mile fast-track application.
- 1.2. The proposal is broadly supported in principle as it is within the Te Pūtahi Ladies Mile Priority Development Area and supports the delivery of a much needed housing product and tenure.
- 1.3. The critical issue that needs further consideration is the cumulative impact on the wider transport network, particularly when this proposal is considered with other consented and proposed growth in the Whakatipu Basin. Key transport interventions rely on NZTA funding and delivery, and that commitment has not been confirmed.
- 1.4. This proposal, together with other consented development, takes Te Pūtahi Ladies Mile beyond the secondary school trigger, and will bring forward the need for the construction of the primary school. Ministry of Education (MoE) funding and delivery also has not been confirmed.

## 2. Strategic Context

### Queenstown Lakes Spatial Plan 2021

- 2.1. The proposal is within the Te Pūtahi Ladies Mile Priority Development Area of the Queenstown Lakes Spatial Plan 2021 ([the Spatial Plan](#)) and is zoned for urban use in the Proposed District Plan (Te Pūtahi Ladies Mile Special Zone), but the proposed density is greater than envisaged when considered cumulatively across the wider area.
- 2.2. The proposal supports additional housing supply and rental choice in a location identified for growth. The location also supports more compact urban form, provided enabling transport, stormwater and community infrastructure are delivered.

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

- 2.1. The proposal demonstrates general alignment with the Joint Housing Action Plan (JHAP), specifically addressing Actions 2, 3, 5, 6, 7, and 9, through its emphasis on increasing housing supply and supporting a build-to-rent model. This model is expressly anticipated as part of a more diverse housing system. As a long-term rental offering, the development has the potential to enhance rental security, increase supply, and improve relative affordability, aligning with the JHAP's focus on system-wide responses to housing needs.

- 2.2. While, the proposal will make a positive contribution to ongoing rental supply and stability, it does not address the provision of truly affordable housing. There is a shortage of affordable housing across Queenstown Lakes, even though demand is increasing. There are currently over 1600 households on the Queenstown Lakes Community Housing Trust's waiting list. Achieving perpetual affordable housing requires specific measures, such as a 5% contribution to a registered Community Housing Provider or a similar arrangement offered directly.

### **Other matters**

- 2.3. Other key matters that require attention are the open space provision and location, public access through the site, and traffic modelling. These are all addressed in detail in the relevant Technical Memos.
- 2.4. The impact on the transport and school network remains the critical constraint. NZTA, QLDC, ORC and developers need a coordinated and funded response.

## **3. Critical constraint – The State Highway Network**

- 3.1. The relevant network is the wider Whakatipu transport system, centred on the state highway corridor through Frankton and the connections between Te Pūhahi Eastern Corridor (Ladies Mile, Lake Hayes Estate, Shotover Country), Frankton, Queenstown Town Centre and Te Tapuae Southern Corridor.
- 3.2. In practice, this means additional trips from the proposal will add pressure not only at the site access points, but also across already constrained intersections and corridors, including the Ladies Mile corridor, SH6/SH6A, the Frankton Road corridor, and the wider Frankton Flats network. These routes perform a strategic function for residents, workers, freight, public transport and visitors, so the effects need to be considered at a network scale rather than on a site-by-site basis.
- 3.3. The state highway network is already under significant pressure, and this is particularly important for Frankton as the district's main employment area and a key access point for the wider Whakatipu Basin. Additional traffic moving into and through Frankton will increase pressure on already constrained intersections and corridors, with direct effects on access to jobs, public transport reliability, freight movement and business activity. This is compounded by the fact that growth has outpaced earlier assumptions, and current transport planning does not yet account for fast-track development or additional housing capacity enabled through intensification.
- 3.4. The 2024 Queenstown Public Transport Business Case<sup>2</sup> and the 2020 NZTA Queenstown Business Case<sup>3</sup> both of which were developed in partnership between NZTA, Otago Regional Council (ORC) and QLDC highlight the scale of the problem within the Whakatipu roading network is significant. Modelling indicates that by 2028, average conditions will be similar to current peak travel times e.g. travel times between Lake Hayes Estate and Queenstown are projected to regularly exceed 60 minutes by 2028.
- 3.5. Without investment, transport constraints will continue to affect residents, freight, visitors and economic performance. The business cases estimate a do-minimum scenario could result in economic losses of around \$670 million to \$1.2 billion over 60 years, including impacts on visitor spend, business efficiency and the cost of growth.
- 3.6. This reinforces the need for a funded response across NZTA, QLDC and ORC and developers. An integrated response is required across transport infrastructure, public transport service improvements and travel demand measures. On-road measures alone will not be sufficient.

## 4. NZTA is refreshing its Strategic Network Plan for the Whakatipu Basin

- 4.1. NZTA's Strategic Network Plan is critical in confirming the next transport response, including corridor function, investment priorities, and the relationship between further roading expansion as well as bus-based and offline public transport options.
- 4.2. That work tests cumulative growth scenarios, including fast-track development, and helps identify network tipping points, staging requirements and investment triggers. It is anticipated to be completed by late 2026 and should inform the assessment of this proposal, including the cumulative transport effects, the mitigation required, and the staging and funding triggers for any approval.

## 5. School infrastructure

- 5.1. With cumulative growth now expected to exceed the secondary school trigger, Ministry of Education funding and delivery for both school provision and staging need to be confirmed. This is particularly important given existing pressure on local school capacity and the scale of consented and proposed development in Te Pūtahi Ladies Mile.
- 5.2. The Shotover Primary School is also nearing capacity. As a result, funding, staging and delivery of the primary school within Te Pūtahi Ladies Mile also need to be confirmed.

## 6. Fast track consenting in the Whakatipu Basin will result in cumulative adverse effects

- 6.1. Queenstown Lakes District is disproportionately affected by the fast-track consent process because the Proposed District Plan and Spatial Plan already enable more than 108,000 additional homes, far exceeding the projected demand for 24,000 additional homes by 2055. In that context, fast-track proposals in the Whakatipu Basin are not needed to meet projected housing demand. Despite this, more than 11,000 homes are proposed via fast tracks in the Whakatipu Basin.
- 6.2. In addition to these housing developments, there are also a number of Fast Track tourism proposals that would significantly increase visitor numbers and place further pressure on the transport network, including the Remarkables ski field expansion expected to require movements of up to 2,000 additional people per day at peak times. With around 17,000 existing homes already in the Whakatipu, the combined scale of residential and tourism-related fast-track development is substantial and highlights the need to take a cumulative, network-wide approach to assessing applications. Please refer to **Attachment A**, which highlights the number of fast-track proposals within the Whakatipu Basin.
- 6.3. Fast-track applications would add materially to growth pressure in the Whakatipu Basin, including further demand on transport and social infrastructure. This reinforces the need to assess cumulative effects at a network scale.
- 6.4. While there has been active engagement between NZTA, ORC, QLDC and MoE through City and Regional Deal negotiations, the cumulative implications for the state highway network, public transport, and school provision remain unresolved.

## 7. Overall Recommendation

- 7.1. Any approval needs to align with a coordinated infrastructure response, with clear triggers for delivery.

7.2. Subject to referral being accepted, and the matters outlined in the other technical reports being addressed, the application should be conditional on the following being funded and delivered:

- local upgrades specific to Te Putahi Ladies Mile identified as necessary within the Structure Plan,
- additional local upgrades identified as required due to the proposal delivering higher density faster than what was anticipated by the Structure Plan triggers, and
- network upgrades identified in existing business cases and confirmed in the Strategic Network Plan.

7.3. While the development offers a desirable housing typology in an appropriate location, the cumulative effects on the transport and education networks need to be planned for, and arrangements need to be incorporated to enable perpetual affordable housing under a similar model to that used by the Queenstown Lakes Community Housing Trust.

ENDS

Attachment A

# Technical Memo

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<b>To:</b>	QLDC Resource Consent Team
<b>From:</b>	<b>Andy Calder, Consultant Planner, Scott Wilkinson Planning</b>
<b>Date:</b>	Wednesday, 20 May 2026
<b>cc:</b>	
<b>Subject:</b>	<b>Fast-Track Approvals Act 2024</b> <b>Simplicity Living Te Pūtahi Ladies Mile: Referral Application (FTRA 2602)</b> <b>Planning – s 17 comment</b>

## 1. Executive Summary

- 1.1. The Simplicity proposal has been supported by a Referral application package that generally correctly identifies the planning framework relevant to the proposal, and correctly summarises the likely consents required and the key reasons for those.
- 1.2. From a planning perspective, there are several key ‘non-compliances’ with the planning framework that are more significant than others and which have impacts on whether the proposal can contribute to a well-functioning urban environment and achieve consistency with the planning framework that applies to the application site.
- 1.3. These non-compliances principally relate to the delivery, and timing, of transport and educational infrastructure to support future residents, and the degree to which Structure Plan outcomes are achieved through the alternatives offered in the proposal.
- 1.4. These matters are highlighted as they will require addressing by the applicant, whether in a Substantive application, or in a conventional resource consent application.

## 2. Introduction

- 2.1. This regulatory planning memorandum has been prepared by Andy Calder, Scott Wilkinson Planning on behalf of Queenstown Lakes District Council (QLDC), to summarise key planning framework matters relating to the Fast Track Approvals Act (**FTAA**) referral application made by Simplicity Living Limited (**SSL**) for a residential development at 12 Lower Shotover Road, and 435 Frankton – Ladies Mile Highway, Queenstown (the **proposal**).
- 2.2. This assessment is limited to the information available and listed below (refer paragraph 5.1).

- 2.3. The memorandum focuses on reviewing the planning framework analysis in the application package and identifying if there are any reasons that could support a decision to NOT refer the application under the FTAA, in particular under sections 21 and 22, and if there are any key matters that the council would seek the Minister specifically direct the applicant to address should a decision to refer the application to the substantive FTAA process.
- 2.4. I note that other technical experts are preparing technical memoranda that may overlap with the content of this memorandum, in terms of urban design, parks and transport matters. I have sighted the urban design technical memorandum and defer and rely upon that document as necessary in the following assessment.

### 3. Qualifications and Experience:

- 3.1. I have a Bachelor of Planning (Second Class Honours – First Division) from the University of Auckland. I have over 23 years' experience working as a planner, having worked in the United Kingdom for six years earlier in my career before returning to New Zealand to undertake a variety of local government roles at Auckland Council and Kaipara District Council, a private planning consultancy and more recently for a Crown entity. I am a member of the New Zealand Planning Institute.
- 3.2. More recently, I have been providing, and continue to provide, planning support to Queenstown Lakes District Council (**QLDC**) in relation to the processing (assessment and recommendations) of resource consent applications.
- 3.3. This has included applications within the Te Pūtahi Ladies Mile area, and of particular relevance has involved participation in earlier pre-application discussions between the applicant and QLDC for prospective resource consent applications under the Resource Management Act 1991 (**RMA**). It is noted that the Referral application relates to a larger site than what was considered at those early pre-application discussions, notably through the inclusion of an additional parcel of land on the eastern side the application site.
- 3.4. I have experience in the preparation of small to large scale residential and commercial resource consent applications. I have also managed a range of projects through consenting processes (including hearings).

### 4. Expert Witness Code of Conduct

- 4.1. I have prepared this memorandum in compliance with the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I confirm that this memorandum is within my area of expertise and that I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

4.2. I am aware of my role to assist QLDC as an independent planning expert. As such, the recommendations made in this memorandum are my own, based on my expertise.

## 5. Matters for Review

5.1. The following application documents were considered as part of my memo:

- a. Appendix 1 - Project Site
- b. Appendix 3 - Simplicity Living Capability Statement
- c. Appendix 4 - Project Delivery and Timeframe Report
- d. Appendix 5 - Architectural Plans
- e. Appendix 6 - Engineering Infrastructure Servicing Technical Memorandum
- f. Appendix 7 - External Infrastructure Concept Plans
- g. Appendix 8 - Scheme Plans
- h. Appendix 9 - Economics Report
- i. Appendix 10 - Geotechnical Report
- j. Appendix 11 - Transport Memorandum
- k. Appendix 12 - Urban Design Statement
- l. Appendix 13 - Consultation Report
- m. Appendix 14 - QLDC Consultation.
- n. Referral AEE
- o. Simplicity Living Rules Compliance Table for Referral (draft) (the **Compliance Table**)

5.2. In addition, the following legislative and planning frameworks have been considered

- a. The FTAA;
- b. The RMA;
- c. Relevant 'national direction' promulgated under the RMA, and of particular relevance, the National Policy Statement on Urban Development 2022 (**NPS-UD**);
- d. The Proposed Otago Regional Policy Statement 2021 (**ORPS**);
- e. The Queenstown Lakes Proposed District Plan (**PDP**) (the zone and district wide chapters applying to the application site, via the Te Pūtahi Ladies Mile Zone (**TPLM Zone**) and Structure Plan, are operative).

## 6. Background

6.1. The PDP was subject to a variation for the locality (the Ladies Mile variation) that sought to introduce the TPLM Zone into the PDP. This variation was process progressed under the RMA's streamlined planning process (**SPP**) provisions.

6.2. Before requesting Ministerial direction on the use of the SPP process in October 2022, QLDC undertook extensive consultation and engagement on the intended outcomes for the TPLM corridor, Ministerial direction was provided on 30 March 2023, with that followed by QLDC's administration of

the variation process through 2023 and 2024. This culminated a Minister decision on the variation on 16 November 2024.

- 6.3. The PDP's TPLM provisions were made operative on 6 December 2024.
- 6.4. The proposal contained in the Referral application include aspects that challenge / test the outcomes sought in the TPLM Zone, as articulated in the Structure Plan. The timing of the application relatively soon after the TPLM Zone becoming operative does raise plan integrity issues that, while not directly relevant to the consideration of the Referral application, QLDC acknowledge will likely challenge community expectations for the area covered by the TPLM Zone.
- 6.5. These issues relate to: development capacity constraints (i.e. does the proposal limit other land owners from realising their development potential), the allocation of densities across the TPLM Zone (i.e. should QLDC allow even more intense development in areas earmarked for higher density), and the magnitude of the building height infringement that allows for the building heights and intensity of development proposed.

## 7. Analysis of Referral Application Package

- 7.1. The particular elements of the package that provide commentary on planning framework and resource consenting matters are the Referral AEE and the Compliance Table.
- 7.2. I have reviewed both documents and consider that they reasonably reflect and identify the reasons for consent and activity status for the proposal under the PDP. At section 4 of the Referral AEE, the document confirms the different types of consent, and activity status, that the proposal requires. This includes 'district' and 'regional' land use consents, subdivision consent, and discharges permits relating to the discharge contaminants to water and air from land preparation activities.
- 7.3. Of particular importance, both documents confirm that the proposal has an overall activity status of 'non-complying' under the PDP's TPLM Zone. For completeness, there are no 'prohibited' activities in the TPLM Zone.
- 7.4. I note that the Referral AEE sets out that no consent is required under any national environmental standard. It is unclear how this has been demonstrated in relation to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (**NES-CS**). In the event that consent is required, this would not be determinative to overall activity status or the merits of the proposal.
- 7.5. The Compliance Table sets out the specific compliance / non-compliance status of the proposal against the TPLM Zone. Many of the non-compliances relate to more granular design and layout matters that are resolvable and not considered to be of importance to the Referral application, but will be in scope for any subsequent Substantive application should that eventuate.

- 7.6. The critical 'non-compliances', which include several that attract a 'non-complying' activity status, relate to Structure Plan alignment and infrastructure delivery triggers, and building height. In this instance, the infrastructure in question is principally transport infrastructure, but a specific rule relates to educational facilities across the precinct.
- 7.7. One key matter relates to the development potential realised in this particular proposal and the implications for wider TPLM Zone in terms of outcomes and plan integrity.
- 7.8. These matters are relevant to the consideration of whether or not the proposal can or will achieve consistency with the planning framework, and whether or not the proposal can achieve or contribute to a 'well-functioning urban environment' as sought by the NPS-UD.

## 8. Structure Plan alignment

- 8.1. As noted above, the TPLM Zone includes a Structure Plan, and this is then linked / referenced in particular rules and standards. Of particular relevance is Rule 49.5.21 Structure Plan, which requires resource consent as a non-complying activity where a proposal is not consistent with the Structure Plan.
- 8.2. The Structure Plan is copied at Figure 1 following, with the proposed site plan at Figure 2. The two key non-compliances set out in the Compliance Table are the location of the 'local shopping centre' and the provision / location of open space within the application site.
- 8.3. The local shopping centre is instead proposed to be located on the far western corner of the application site. While this is a deviation from the Structure Plan, it is acknowledged that the intent and extent of the area is being provided elsewhere within the application site.
- 8.4. The proposal seeks to locate the open space area on the northern side of the application site, at the foot of the northern foothills, as well through the provision of privately owned (but publicly accessible) spaces throughout the development. This has been a key issue between Applicant and QLDC during pre-application consultation in that the proposed open space may not align with QLDC's requirements for open space, and the privately owned space within the development may not be adequately mitigate the non-provision of public open space that does comply with QLDC requirements.

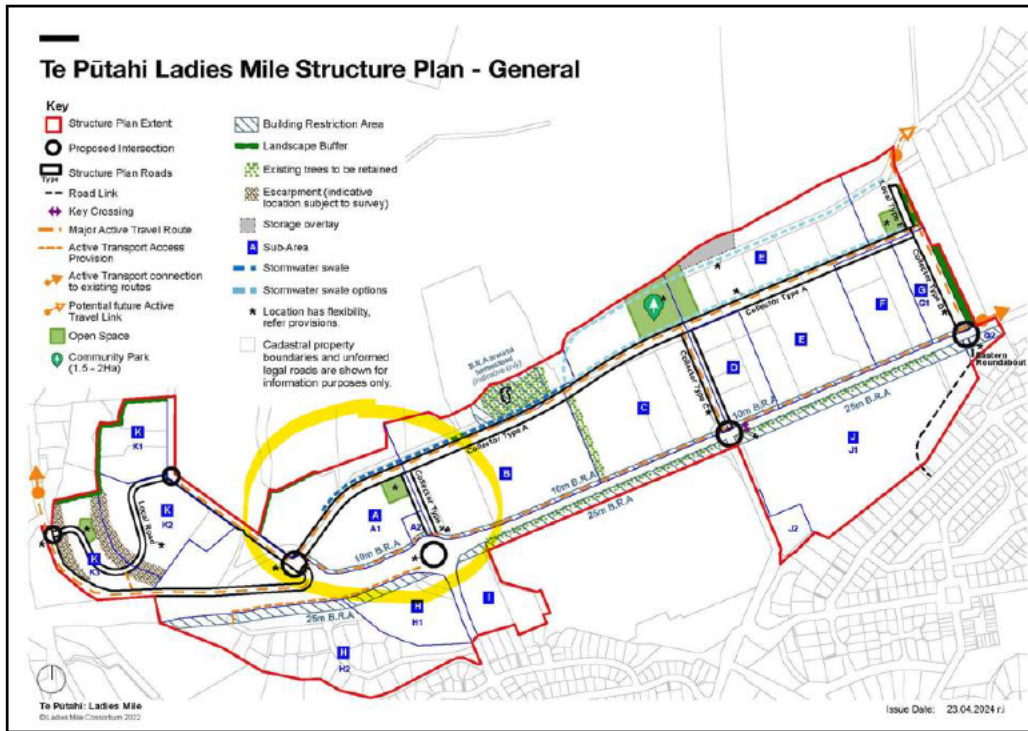


Figure 1: TPLM Structure Plan

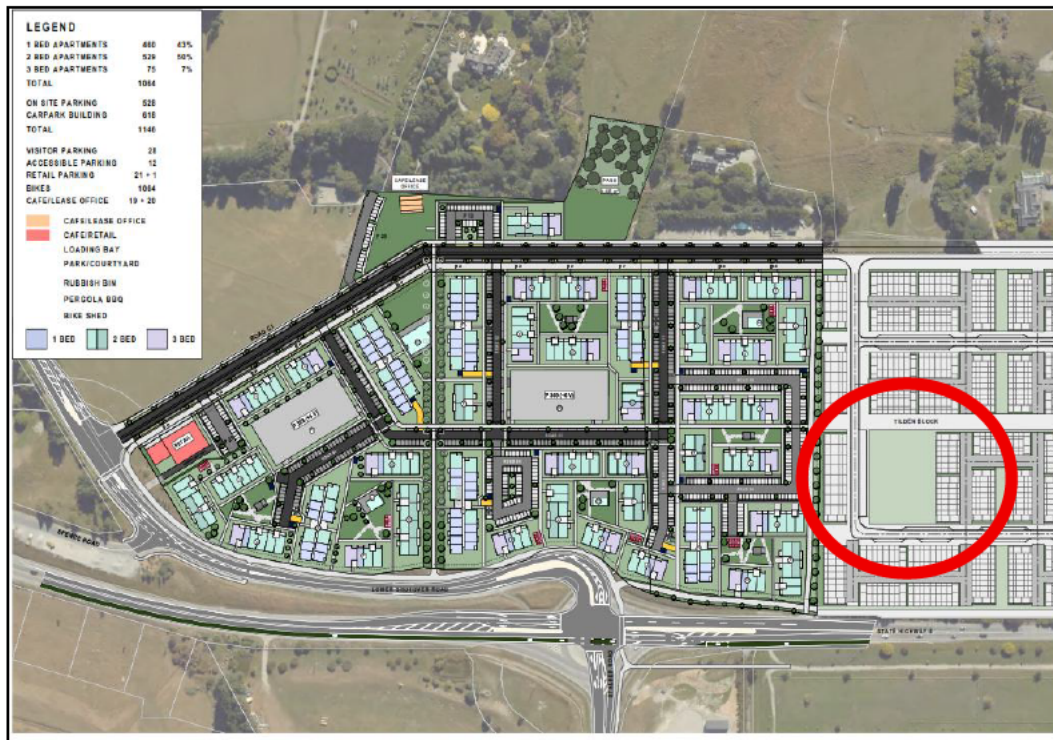


Figure 2: Proposed Site Plan

8.5. Additionally, it is relevant to note that the land to the east of the site is subject to a resource consent for a comprehensive residential development (QLDC reference: RM230721, approved 27 February 2024) and which is the subject of a s127 variation application (QLDC reference: RM251107). This undetermined application seeks to create a public open space in the location marked with a red circle in Figure 2 above and as indicated in the location shown with a red circle in Figure 3 following.

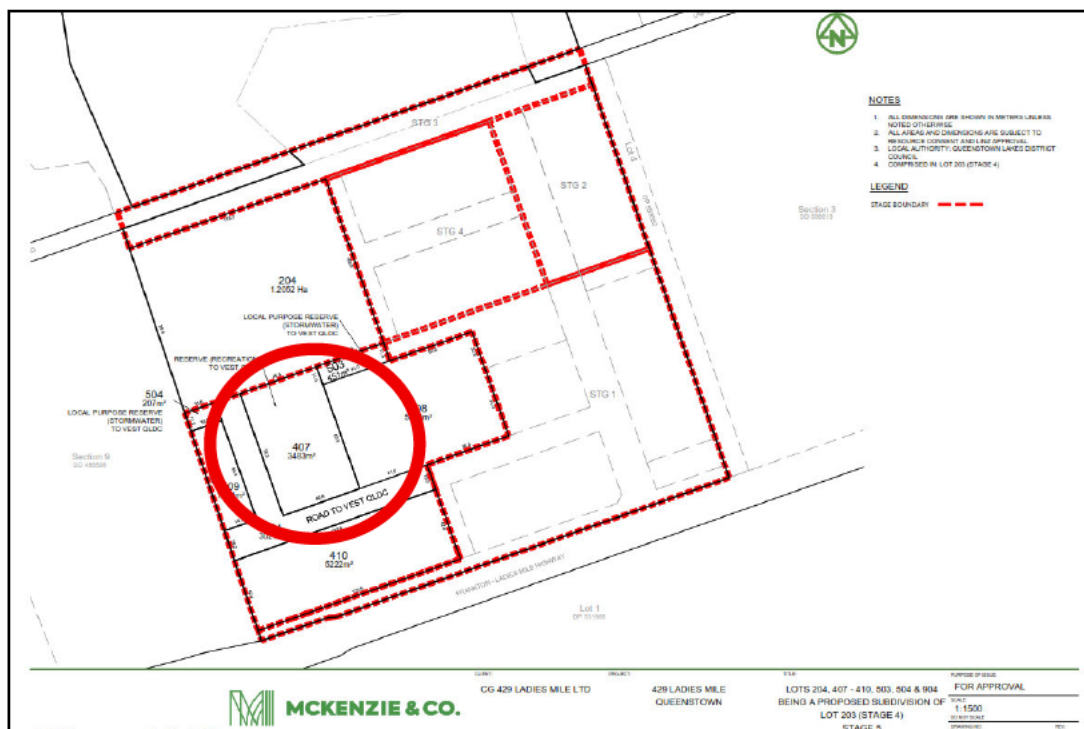


Figure 3: Scheme plan for RM251107

8.6. This proposed open space is close to where the Structure Plan requires it, albeit for the application site. While there may be an argument that this open space could undertake the 'open space' role that the Structure Plan anticipates, the proposal's increased residential intensity may counter against this open space, if delivered, being sufficient. Given this is outside of the applicant's control and the subject s127 application is undetermined, there is a risk in seeking to rely upon it as a justification for the applicant not providing the open space as required by the Structure Plan. Irrespective, I defer to the commentary provided in the parks specialist's technical memorandum for specific appraisal of the merits of the open space being provided, as well as the urban design technical memorandum for commentary on the arrangement of open spaces (public and private) throughout the proposal.

8.7. A third aspect is not addressed, which is the provision of a 'collector road' in a north south direction adjacent to where the open space and local shopping centres are set out. The proposal does provide for a corridor across the majority of that collector road's position but terminates prior to the existing Lower Shotover Road / Stalker Road junction on State Highway 6. I defer to the urban design technical memorandum for specific commentary here, noting the concerns raised around the specific alignment, design and tenure (ownership and/or public rights of way) for the collector road and, for completeness, other corridors within the proposal.

8.8. All three are linked insofar that the Structure Plan contemplated both the open space and the local shopping centre anchored to the collector road's alignment, and the proposal seeks to only provide the corridor (in part) only. The move away from the Structure Plan's anticipated arrangement of spaces and activities may have merit, but these remain untested.

## 9. Infrastructure Triggers and Delivery

- 9.1. Beyond inconsistency with the Structure Plan, the Referral AEE and the Compliance Table acknowledge that there are infrastructure timing and delivery issues associated with the proposal. On its own, the proposal's 1,064 units does not trigger the requirement for educational facilities, being 1,100 residential units. However, the rule trigger is to be taken across the TPLM zone and based on what is known to be consented, the threshold is exceeded. Resource consent as a restricted discretionary activity is required, with discretion limited to effects on the transportation network.
- 9.2. The Compliance Table refers to ongoing discussions with the Ministry of Education around their delivery pipeline, but there are no specific details provided when this would be delivered. This lack of certainty may be of significance to whether or not the proposal can achieve the outcomes sought by the TPLM Zone and associated Structure Plan, and given the matter of discretion, may result in significant impacts on the ability of the immediate and wider roading network to function safely and efficiently.
- 9.3. In relation to transport infrastructure, the Transport Assessment at Appendix 11 provides a high-level commentary around the funding (or lack thereof) from Crown and Council sources for specific projects over a 10 year horizon. The Transport Assessment does clarify the Compliance Table's statements insofar that several of the required transport projects can be delivered in accordance with the intent of the TPLM Zone's requirements, with others that cannot. This proposed arrangement may be of significance as to whether or not the proposal can achieve the outcomes sought, and whether or not the proposal has significant impact on the ability of the immediate and wider roading network to function safely and efficiently.

## 10. Other Zone Non-Compliances

- 10.1. The most contentious of the other TPLM Zone non-compliances is the extent to which the proposal seeks to infringe building height limits across the site. This is driven by several buildings across the wider development and is critical to the proposal achieving the densities that it seeks to achieve.
- 10.2. This issue is nuanced as the placement of the infringing building elements, and height and position of other buildings in the foreground and context relative to key vantage points, can assist with the mitigation of potential adverse effects on the wider environment.
- 10.3. It is also acknowledged that the site's site also allows for considerably more mitigation measures to be employed compared to a building height infringement on a small brownfield parcel of land. The merits of a building height infringement will be fact and degree based and dependent on the mitigation measures proposed and site circumstances.
- 10.4. I note and defer to the commentary in the urban design technical memorandum around the inability to properly assess the infringements sought and the need for additional information and analysis.

10.5. It is also noted, but not material to the Referral application, that the Structure Plan omits to define a building height in the original location of the 'local shopping centre'.

## 11. Summary

11.1. The proposal is of a scale and general arrangement that can meaningfully contribute to the outcomes anticipated for the TPLM Zone.

11.2. There remain matters around the sequencing and delivery of infrastructure and the lack of certainty, or delayed timing of delivery. This does raise questions of whether or not the proposal can adequately contribute to well-functioning urban environment, as well as achieving an adequate degree of consistency with the relevant planning framework.

11.3. While these matters do not appear unresolvable from a planning perspective, they will need to be addressed at any subsequent Substantive application stage.

# Technical Memo

<b>To:</b>	QLDC Resource Consent Team
<b>From:</b>	Jeannie Galavazi, QLDC Principal Parks and Reserves Planner
<b>Date:</b>	Wednesday, 20 May 2026
<b>cc:</b>	
<b>Subject:</b>	<b>Fast-Track Approvals Act 2024</b> <b>Simplicity Living Te Pūtahi Ladies Mile: Referral Application (FTRA 2602)</b> <b>Parks and Reserves technical comment – s17 comment</b>

## 1. EXECUTIVE SUMMARY

- 1.1. This memorandum provides QLDC Parks and Reserves (**P&R**) input to inform the Queenstown Lakes District Council's (**QLDC or Council**) response to the Minister under s 17 of the Fast-track Approvals Act 2024 (**FTAA**) for the Simplicity Living Te Pūtahi Ladies Mile Fast Track referral application (**Project**).
- 1.2. This memorandum provides:
  - 1.2.1. an outline of the Local Park requirements on Ladies Mile, specifically the Local Park shown on the District Plan's Te Pūtahi Ladies Mile Structure Plan located on the Project site.
  - 1.2.2. a high-level assessment of the alternative Local Park proposed by Simplicity.
  - 1.2.3. the requirements for a Local Park to meet the QLDC Parks and Open Spaces Strategy (2021), Future Parks Provisions Plan (2021) and the QLDC Development Contributions Policy (Updated for 2025-2026).
- 1.3. Overall, the Project does not provide sufficient or suitable open space. The proposed relocation of the Local Park is a poor outcome as the site is not universally accessible, will be shaded in winter and is constrained by stormwater infrastructure. The increased density and lack of public ownership of other open spaces will place additional pressure on the wider Ladies Mile Te Pūtahi Structure Plan open space network.
- 1.4. For the substantive application the applicant should provide Local Park open space that is (at least) consistent with the Ladies Mile Te Pūtahi Structure Plan found at 49.9 of the District Plan and on flat land that meets the criteria in the Future Parks Provision Plan.

## 2. QUALIFICATIONS AND EXPERIENCE

- 2.1. This report was prepared by Jeannie Galavazi, Principal Parks and Reserves Planner at QLDC.
- 2.2. I hold a Bachelor of Parks, Recreation and Tourism Management from Lincoln University. I have 25 years of professional experience. I have been a Parks and Reserves Planner at QLDC for nearly 11 years where responsibilities include authoring key Parks Strategies and Plans, presenting expert evidence at the Environment Court on behalf of QLDC and the assessment of development proposals and effects on the reserve and recreation network.

2.3. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical report has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

### 3. LOCAL PARK ANTICIPATED BY THE STRUCTURE PLAN

3.1. The Te Pūtahi Ladies Mile area has been identified through spatial planning, structure planning, and recent rezoning as a key growth area for the Queenstown Lakes District. Development within the area is anticipated to support significant residential growth alongside substantial investment in transport and three waters infrastructure.

3.2. One of the key objectives of the Ladies Mile Te Pūtahi Structure Plan at 49.9 of the District Plan (**Structure Plan**) is to achieve a range of quality open spaces, including a significant community recreational facility, to benefit the existing nearby communities as well as those to be accommodated in the new urban development. Once fully developed Ladies Mile (including the existing residential area to the south) will be one of the largest urban residential areas in the district.

3.3. The Structure Plan includes one centrally located Community Park of approximately 1.5-2 hectares, and three Local Parks of approximately 3000m<sup>2</sup> each (minimum), all to be vested as Recreation Reserves. This memorandum focuses specifically on the Local Park that is located on the Project site that this fast-track application relates to (Sub-Area A1). Figure 1 below shows the Structure Plan and the location of the three Local Parks and one Community Park.

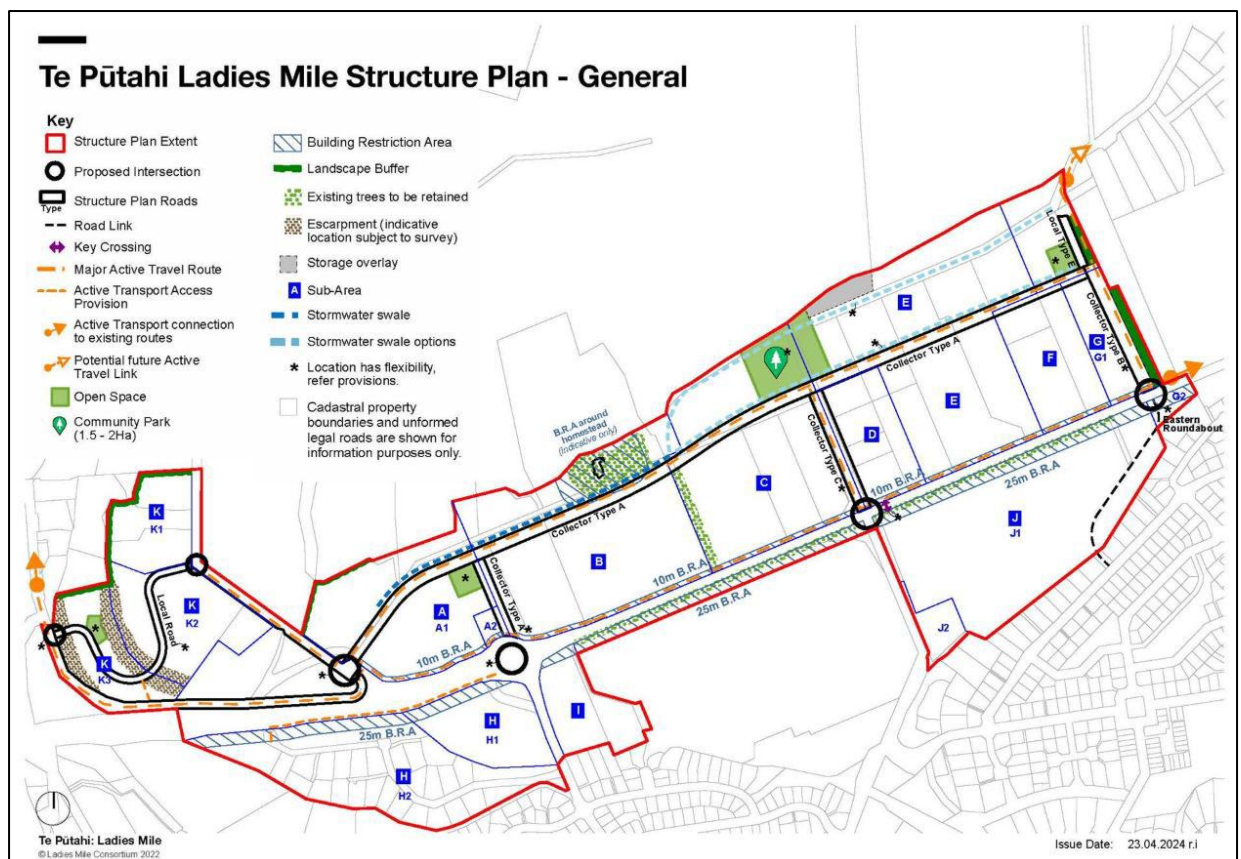


Figure 1: Te Pūtahi Ladies Mile Structure Plan, District Plan, 49.9

- 3.4. The Parks identified in the Structure Plan have been intentionally located to ensure they are central and easily accessible within the neighbourhoods. The Parks are also connected by high quality walking and cycle networks. The size and location of the parks have been determined through the QLDC Parks and Open Spaces Strategy (2021) and the Future Parks Provision Plan (2021)<sup>1</sup>.
- 3.5. The QLDC Future Parks Provision Plan defines a Local Park (refer to page 27 and Attachment 1) and sets the level of service for how much reserve land should be provided and where. Every resident in urban areas in the district should have a Local Park an easy 5-10 minute walk from where they live.
- 3.6. The Local Parks identified on the Structure Plan will be for the residents' recreation and open space needs, and it is anticipated that they will be heavily utilised given the anticipated higher density of development. The Park land must be a minimum of 3000m<sup>2</sup>, be large enough to provide community gathering spaces and to host small community events. It will be a public area where the residential community will connect, as private open space is limited in medium and high-density development. The reserve will serve all residents in the nearby vicinity, not just those living within the Project site.
- 3.7. To ensure the Local Park can achieve its intended purpose it must be predominantly flat, quality recreation land, that is not of a substantially different size or configuration as to that shown on the Structure Plan. It must be suitable for a variety of recreation activities and unconstrained by non-reserve related infrastructure, such as stormwater soakage, as it needs to accommodate structures and buildings such as multi-use hard courts, public toilets and playgrounds.

#### **4. PROJECT**

- 4.1. The Project is a high-density urban development within the Te Pūtahi Ladies Mile zone.
- 4.2. The key components of the Project include:
  - 1100 rental apartments in a mix of three level walk-up apartments and five to seven level apartment buildings;
  - Four resident community buildings, including work-from-home spaces, indoor recreation and family spaces;
  - A Local Park proposed to be vested to QLDC at the edge of the development at the toe of Slopehill (as shown in Figure 2);
  - The remaining open space provision in the development will be retained by Simplicity Living Limited in private ownership and comprises:
    - A triangular village green
    - A residents' pavilion adjacent to the triangular green.
    - Several smaller pocket parks (detailed information not provided with the referral application).

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<sup>1</sup> <https://www.qldc.govt.nz/your-council/council-documents/strategies-and-publications/>



Figure 2: Development layout including proposed vested reserve.

## 5. ASSESSMENT

- 5.1. The application proposes significantly more dwellings per hectare than was anticipated for the site at the time the Structure Plan was introduced to the District Plan, and subsequent reserve land quantity calculations. Under the QLDC Financial and Development Contributions Policy (DC Policy) and Future Parks Provisions Plan, 1100 dwellings generate a much higher amount of Recreation Reserve land required than the density anticipated from this site in the Structure Plan and this will put additional pressure on the open space network.
- 5.2. Where density is increased to provide a more varied mix of housing typologies for future residents, it is important that more vested high-quality public space is needed across Sub Area A/B to support the uplift in density proposed by the Project, particularly as individual private greenspace will be limited or unavailable. These public spaces need to be high performing, have decent size flexible flat areas that are useable in wet weather events, meet the changing needs of the community over time.
- 5.3. The Project does create a compact, walkable, neighbourhood with several private smaller open spaces (pocket parks). While these may have positive urban design outcomes, they do not provide sufficient open space to accommodate a range of recreation activities required for the level of density proposed, nor are they accessible to the wider Ladies Mile residents.

### Proposed Vested Local Park

- 5.4. The application states the Local Park, located in a different area than shown on the Structure Plan, is an improved outcome as it is slightly larger than the required 3000m<sup>2</sup> minimum, and is has a bush covered slope as a backdrop.

5.5. This reserve not a suitable replacement for the Local Park/Recreation Reserve required by the Structure Plan, for the reasons outlined below:

- Approximately 50% of the proposed Local Park is on a hill and is vegetated. This will not be accessible to all members of the community including elderly and young children who cannot access play equipment or reserve improvements on a hill.
- The Stormwater Layout Plan in the Simplicity Engineering Infrastructure Servicing Memorandum indicates the flat areas will almost entirely accommodate stormwater infrastructure (Attachment 2).
- When a reserve is constrained by stormwater infrastructure this does not allow for a flexible multipurpose space that can accommodate buildings or recreation infrastructure such as public toilets, playgrounds or hard courts.
- More information is required about the shading of the relocated Local Park will be predominantly shaded in the winter by Slope hill.

5.6. As such, while the Local Park shown in the application may contribute to the open space network on Ladies Mile and provide a point of difference as a walking track with an outlook, it is not a suitable substitute for the Structure Plan Local Park and consequently is a departure from the Structure Plan. Accordingly, the residents of the proposed 1100 dwellings will have no access to a quality multipurpose Local park that can support recreation infrastructure within the Project site. The proposed reserve could be vested as a Local Purpose (Stormwater) Reserve.

## **6. Private open spaces**

6.1. Private open spaces do provide relief from the built environment, provide amenity and a space for trees especially in higher density environments such as apartment buildings.

6.2. However, the private open spaces proposed by Simplicity appear to be too small for most recreation activities such as informal sports and community gatherings and they cannot support recreation infrastructure like hardstand courts and should therefore be supplemented by a larger publicly vested accessible green space.

6.3. The application shows easements in gross in favour of QLDC for some pedestrian and cycle connections. However, no easements are provided over the pocket parks. This means no legal access for the wider general public is available for access to the pocket parks. Although the pocket parks are intended for the residents, equitable access for residents of adjoining developments should be provided for.

6.4. Public open spaces are preferable, as QLDC vested recreation reserves are subject to the protections in the Reserves Act (1977), can be managed through council bylaws such as the Dog Control Bylaw and must provide for public recreation access as a primary purpose in perpetuity.


## **7. SUMMARY AND RECOMMENDATIONS**

7.1. The Project raises significant issues concerning the provision of open space that warrants consideration at the referral of the application stage.

7.2. Whilst the Structure Plan does allow for some flexibility for the exact location of Local Parks, the proposed location of the Local Park in the application is to a site that will be constrained by topography and stormwater infrastructure. This is not supported and needs to be amended in the substantive application.

- 7.3. The substantive application should provide for a suitable Local Park on flat land that meets the criteria in the Future Parks Provision Plan.
- 7.4. If the applicant decides not to amend the design to accommodate a suitable Local Park, QLDC will need to acquire a Local Park within the Structure Plan area to the north of the Project site and will need full Reserve Land development contributions for that purpose.
- 7.5. The reserve currently proposed to be vested, could be vested as Local Purpose (Stormwater) Reserve to reflect its primary purpose whilst also acknowledging the variety it could add to the wider open space network.
- 7.6. Private open space does provide amenity and relief from the built environment, but it has limitations for full public access and recreation for residents of the wider Te Pūtahi Ladies Mile area. All private open space should be available to the public through public access easements in favour of QLDC and adequately protected from future development through the implementation of land covenants to ensure they are held in perpetuity for open space/recreation purposes.

## Attachment 1: QLDC Future Parks Provision Plan 2021 Local Park Criteria

LOCAL PARK					
Purpose		Provision guidance		Indicative amenities	
 <p>Park that is easily accessible for the immediate community, within easy walking distance (5-10 minutes) to residents in the area.</p> <p>Provides a basic information recreation experience for nearby residents.</p> <p>Vested as Recreation Reserve under the Reserves Act 1977.</p>		<p>New developments in Residential Urban Growth Areas require a minimum 0.3ha of local park typically requires between <b>0.3ha – 0.5ha</b>.</p> <p><b>Residents shall have easy, safe access to a local park within a 400-600m walk (approximately 5 to 10 minutes).</b></p> <p>It shall be centrally located within the residential development. The exact size will be determined by the size of the subdivision and location and types of the other parks in the area. This shall be of a configuration that is predominantly flat quality recreation land, suitable for a variety of recreation activities and structures. It will provide a transition/buffer space from adjacent roads and housing, good street frontage and contains a flat kick-around space of approximately <b>30m by 30m</b>.</p>		<ul style="list-style-type: none"> <li>&gt; Play spaces/equipment</li> <li>&gt; Flat, kick around space 30m x 30m with buffers</li> <li>&gt; Flat space to be a maximum 6% gradient</li> <li>&gt; Areas for socialising and respite</li> <li>&gt; Landscaping</li> <li>&gt; Specimen trees</li> <li>&gt; Furniture</li> <li>&gt; Ability to place recreation infrastructure on the land</li> </ul> <p><i>Underground services and above ground infrastructure: Local park should be vested free of encumbrances unless otherwise agreed.</i></p>	
Development contributions – reserve land		Development contributions – reserve improvements			
Land provider	DC offsets available?	Asset provider	Offsets available?		
<p>Developer provided if it meets provision guidance.</p> <p>Council should look to acquire in larger developments if not provided or where cumulative impacts of developments require this.</p>	<p>Yes – only for land that can be vested as recreation reserve.</p> <p>(If part of the reserve has a stormwater function this must form a separate parcel and be vested as Local Purpose (Stormwater).)</p> <p>If land not provided Reserve Land DC payment required <b>if in Residential Urban Growth Area/and when changing from rural to residential zone and final lot sizes are less than 2000m<sup>2</sup>.</b></p>	<p>Developer provided – Can include defined/ agreed d assets.</p> <p><b>All developments</b> to pay Reserve Improvement Development Contributions.</p>	<p>Yes – UePlay equipment, park furniture, water fountains.</p> <p>No – Rubbish bins, footpaths and pathways, planting signage.</p>		

**Attachment 2: Simplicity Living Engineering Infrastructure Servicing  
Stormwater Layout Plan.**

Attention:

To | Queenstown Lakes District Council - Resource Consent Team

## Fast-Track Approvals Act 2024 – s17 Comment Technical Memorandum

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### Simplicity Living Application Te Pūtahi Ladies Mile

Location: 12 & 14 Lower Shotover Road, and 435 Frankton-Ladies Mile Highway, Queenstown

Written by:

Michael Lowe | Principal Urbanist | Studio Pacific Architecture.

18/05/2026

#### Executive Summary:

- I see this application is a real success story. The Te Pūtahi Ladies Mile (TPLM) Plan Variation Zone Purpose encourages maximisation of housing provision and density within a Council growth corridor. Simplicity Living Limited (SLL) have proposed a development that is ~2.5x – 3x the density that was expected for the Medium Density Zone of the TPLM Zone (based on my formula used during the original TPLM Hearings – refer paragraph 19). In this sense I consider there are benefits to the application by:**
  - addressing demand and supply issues in the region.
  - it is located within a planned Council spatial growth strategy the TPLM Zone.
  - having the potential to support climate change mitigation through locating density along a key SH6 public transport spine (potentially reducing transport emissions), and avoiding unplanned greenfield development.
- However, the increased density puts added pressure on the TPLM Structure Plan which did not anticipate this quantum of development yield. SLL's masterplan needs further design refinement to ensure the proposal is contextually appropriate within the wider TPLM Structure Plan framework. As such, in my opinion the decision-maker needs to consider how the proposal resolves and/or mitigates potential adverse urban design effects, including pressure on open space amenity provision, transport and social infrastructure (including schools), and increased building height which may affect views to the surrounding Outstanding Natural Landscapes and Outstanding Natural Features beyond that anticipated in the Structure Plan – Noting the Structure Plan was informed by Council-led public engagement.**

3. This urban design memorandum has been prepared by Michael Lowe of Studio Pacific Architecture on behalf of Queenstown Lakes District Council (QLDC), to summarise key urban design matters relating to the applicant's Simplicity Living Limited proposal within Te Pūtahi Ladies Mile.
4. This assessment is limited to the information available and listed below (refer paragraph 12).
5. The memo focuses on reviewing the higher-order structuring elements that underpin the applicant's overall site design. It is important to note that there is an inherent interrelationship between high-level and detailed design elements when assessing urban design matters, and in this regard I am limited in my assessment as I do not have sufficient information regarding the sub components such as the design of buildings, yards, streets, and open spaces.

#### *Qualifications and Experience:*

6. My qualifications and affiliations include a Bachelor of Architectural Studies (BAS) and Master of Architecture (Professional) MArch(Prof) from Victoria University Wellington. I am also a member of the New Zealand Urban Design Forum, and the New Zealand Institute of Architects.
7. I have worked in New Zealand for 13 years across architecture and urban design. My experience and specialisations include preparing plan change documents, structure planning, masterplanning, design guidance, development feasibility studies, architecture and landscape resource consent documentation, transport network and street design, and independent design reviews.
8. I have experience in complex medium density largescale greenfield and greyfield developments for private sector and central and local authorities/entities. I have also been involved in award-winning projects recognised by the NZ Institute of Architects and the NZ Institute of Landscape Architects. I have been on the design team in several Fast-Track Substantive Applications.
9. Of relevance to the applicant's proposal, I was involved in the Structure Plan design of the TPLM Plan Variation. I am currently engaged by QLDC as an Urban Design technical expert to review several applications within the TPLM Structure Plan.

#### *Code of Conduct:*

10. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code in the preparation of this evidence and will follow it when/if presenting evidence at a hearing. Unless I state otherwise, this assessment is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
11. I am aware of my role to assist the QLDC as an independent Urban Design expert. As such, the recommendations made in this memorandum are my own, based on my expertise.

## *Matters for Review*

12. The following documents were considered as part of my memo:

- *Appendix 1 - Project Site.pdf*
- *Appendix 3 - Simplicity Living Capability Statement.pdf*
- *Appendix 4 - Project Delivery and Timeframe Report.pdf*
- *Appendix 5 - Architectural Plans.pdf*
- *Appendix 6 - Engineering Infrastructure Servicing Technical Memorandum.pdf*
- *Appendix 7 - External Infrastructure Concept Plans.pdf*
- *Appendix 8 - Scheme Plans.pdf*
- *Appendix 9 - Economics Report.pdf*
- *Appendix 10 - Geotechnical Report.pdf*
- *Appendix 11 - Transport Memorandum.pdf*
- *Appendix 12 - Urban Design Statement.pdf*
- *Appendix 13 - Consultation Report.pdf*
- *Appendix 14 - QLDC Consultation.pdf*
- *Referral AEE (1).pdf Executive Summary:*

13. There are many positive urban design aspects to this proposal which I summarise here and do not revisit in detail:

- a) A comprehensively masterplanned development approach which efficiently utilises the land and exceeds the minimum density requirement.
- b) Development within a planned growth corridor (transport orientated development).
- c) The provision for long-term rental affordable housing supply.
- d) The development internally includes private amenity in the form of several pocket parks and resident community buildings.
- e) The use of consolidated car parking buildings to efficiently store cars.
- f) The inclusion of a commercial amenity.
- g) The provision for connections into the adjacent eastern landowner's site.
- h) A greater than minimum permeable landscaped area (40%) compared to the Zone requirement (25%).

14. I also see several salient urban design watch points that I will cover in greater detail. These are summarised as:

- i) Deviation from the TPLM Structure Plan in several areas including height plain breaches.
- j) Removal of Collector Type A from the TPLM Structure Plan.
- k) Location, extent of, and function of vested 'Open Space' required of the TPLM Structure Plan.
- l) How to enable free and unrestricted public access across important through-site linkages within a largely SLL owned privatised street and footpath network.
- m) Not meeting all the infrastructure trigger requirements of the TPLM Zone.
- n) Overall increase in density beyond that anticipated in the TPLM Structure Plan.

- o) The lack of public ownership of key through-site transport connections and public space.

## Discussion:

### *Clarification re the applicant's statements made in the Appendix 13 - Consultation Report.*

15. It's important to note that references in the *Appendix 13 – Consultation Report* relating to the *Urban Design Meetings* and my document '*High-Level Urban Design Commentary*' was not based on this Fast-track application. I reviewed an earlier masterplan on a smaller part of the site as part of a Pre-App Resource Consent. There has been no Council urban design engagement with me as part of the applicant's Fast-track application masterplan scheme.

### *Programme Phasing and Infrastructure Triggers*

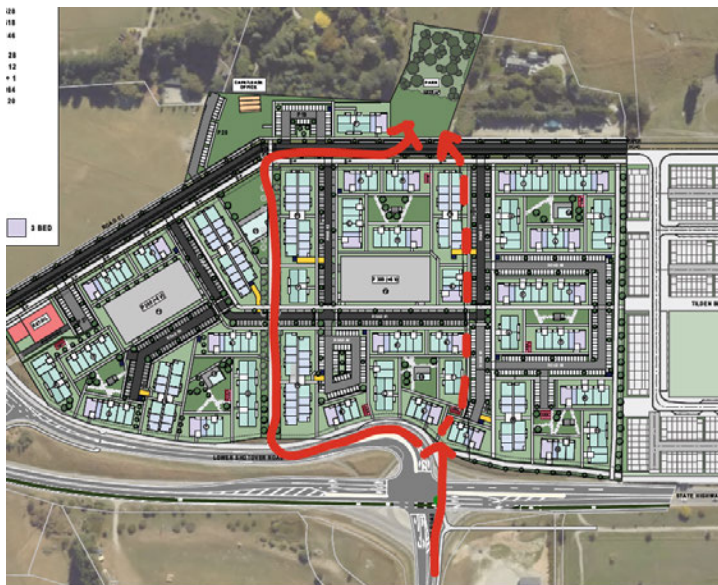
16. The *Programme Phasing* document does not mention how the programme will be delivered and aligned with the requirements of the *TPLM Zone Rules 49.5.39 Transport infrastructural works* for the applicant's site Sub Area A (listed below). The ones highlighted in bold do not appear to be met in this application.
  - Access intersection from at least one of Lower Shotover Road / Spence Road or Collector Road A at Stalker Road
  - Upgraded Lower Shotover Road at Spence Road intersection
  - Bus stops on State Highway 6, Stalker Road intersection (one on each side of State Highway 6)
  - Signalisation of Stalker Road / State Highway 6 intersection, including at-grade pedestrian and cycle crossings across both roads.
  - Active Travel link to State Highway 6 bus stops at Stalker Road Intersection.
  - **Dedicated westbound bus lane on State Highway 6 from Howards Drive to Shotover Bridge (part of Queenstown Package)** - *The applicant delivers this in part only.*
  - State Highway 6 eastbound bus lane from State Highway 6A to Hawthorne Drive and State Highway 6 westbound bus lane from Hardware Lane to State Highway 6A (part of Queenstown Package)
  - **Stalker Road northbound bus priority lane south of State Highway 6**
17. I am unclear how the applicant achieves TPLM Zone Rules 49.4.6 with regards to the 'High School' trigger at 1,100 dwellings. Note the applicant's scheme is for 1,064 dwellings. However, I am aware of several other Resource Consent applications also within the TPLM Zone that are in the process of being lodged (i.e. are at pre-app stage with Council). If a small fraction of those projects were to be realised along with the applicant's masterplan then the number of dwellings in TPLM well exceed the Zone's 1,100 threshold.
18. It is also unclear of the phasing timeframes to deliver the proposed vested Open Space.

### Increased Density

19. The application is for approximately 1,100 dwellings on a ~10Ha site. For context the *TPLM Plan Variation Yield Calculation Methodology*<sup>1</sup> modelling formula would anticipate only ~289 – 346 dwellings (@40 – 48 dwellings/Ha as per the Medium Density Residential Precinct). This was based on an 85% Gross Developable Area development efficiency assumption where 15% of the site would be firstly excluded for site stormwater allowances which are excluded from the calculation. The applicant has achieved ~3–4x the density anticipated.
20. On one hand, the increased density represents a significant success story for accommodating growth within a planned growth corridor, and SLL is responding to a clear housing demand and supply issue in the region. However, this density uplift places greater pressure on a Structure Plan that did not anticipate development at this intensity. Accordingly, in an urban design review, the decision-maker needs more information to determine whether the proposal adequately resolves or mitigates potential adverse effects relating to provision of social amenities (schools and public community spaces), vested open space and connectivity, and transport infrastructure.

### Removal of 'Collector Road A' from the TPLM Structure Plan

21. The applicant's masterplan needs to enable active transport and micro-mobility connectivity to a level of service (lighting, safety, after hours access etc) equal to that intended by the 'Collector Road A' of the TPLM Structure Plan. There is a clear pedestrian desire line from Stalker Road intersection north/south through the site giving access to the proposed vested park at the base of Slope Hill. However, without the 'Collector Road A' the public would need to pass through the applicant's private property. However, there is no public easement included in the *Appendix 8 - Scheme Plans.pdf* to enable the connection dashed in red in the figure below.



<sup>1</sup> *TPLM Yield Calculation Methodology – 4 December 2024* (<chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.qldc.govt.nz/media/xddfmwy0/tplm-yield-updated.pdf>)

22. From a road-user safety perspective, shared paths along ‘Collector Road A’ are not considered a suitable outcome for pedestrians, cyclists, and mobility-impaired users within a higher-density urban environment. This issue has become increasingly relevant with the rise of e-micromobility, where users of electric bicycles and scooters are able to travel at significantly higher speeds than conventional bicycles. While shared paths may function adequately as recreational connections, they are less suitable in situations where footpath space needs to accommodate multiple user groups and functions, including frequent lateral movements associated with people crossing the road, accessing parked vehicles, entering properties, and moving between adjoining public open spaces. Collectively, these activities create numerous conflict points on shared paths between pedestrians and faster-moving cyclists and micromobility users.

### Open Space

23. More information is needed to prove if the vested park in the proposed location will meet functional requirements of Council, i.e.: will it have sufficient universal access given the sloping nature of the site? Is there a large enough flat and flexible multi-purpose space given 50% of the park looks to be within a sloped planted area? Does the park space receive sufficient sunlight and is not overshadowed by Slope Hill or the proposed trees to the North. The comments of Council’s Parks and Recreation team address this issue in more detail from a parks perspective.

24. Whilst the applicant’s provision of private pocket parks within the development is commendable. These spaces are not vested and freely usable by the public. For context the TPLM structure plan yield modelling was expecting significantly less density than the applicant’s proposal (refer point 19 above). Clearly extra open space provision beyond the Structure Plan minimums is needed to support the density uplift. In this sense I am very supportive of the inclusion of pocket park and community spaces throughout the development. However, I consider the proposed 4,000m<sup>2</sup> on a part sloping site is insufficient from Council’s perspective. More vested high-quality public space is needed across Sub Area A/B to support the uplift in density. These spaces need to be high-performing, have decent size flexible flat areas that are useable in wet weather events, and resilient to be adapted by Council to meet the changing needs of the community over time.

### Height

25. There looks to be multiple breaches to the TPLM Zone Building Heights Plan resulting in potentially up to 3 storeys above the permitted height. I need to see more information to understand the measured extents (including relative to the proposed modified ground), and the prevalence of these breaches when viewed from key surrounding public areas whether they are highly visible. For example: Along the SH6 – will the tallest towers distract from the TPLM Structure Plan’s overall legibility which expects the greatest building height to be in the High Density Precinct where it would be logically closest to the Commercial Precinct. First person visualisations like drawing *UD012 in Appendix - Architectural Plans.pdf* is most helpful in this regard.

26. It would be helpful to understand how the proposal compares against the baseline development capacity enabled by the TPLM Zone. In particular, is the SSL proposal, when considered holistically across their land holding, generally working within or

exceeding the plan-enabled capacity when balancing proposed exceedances and underutilisation relating to height, recession planes, yards, site coverage, and maximum building length? For example, favourably for the applicant there may be areas where their proposal has not maximised the full enabled height.

#### *Sustainability and resilience 49.8.1(f)*

27. More information is required on how the proposal will meet the TPLM Plan requirement to demonstrate design initiatives to reduce carbon emissions (embodied, operational energy, and end of life emissions), and operational water use. Is there an overarching sustainability certification being sought such as Green Star or Homestar?

#### *Accessibility 49.8.1(g)*

28. It is unclear how the vested open space achieves reasonable 'universal access' given the applicant's proposed park straddles a large portion of topographic incline at the base of Slope Hill.
29. Furthermore, it is unclear how free and unrestricted public access along key active transport through-site connections is achieved in the proposed private ownership model. There are broader connectivity movements across the TPLM Zone that need to be provided for – refer paragraph 21.

#### *Car Parking and Travel Demand Management:*

30. I am concerned that the proposed allocation between private and visitor parking is inadequate, particularly given only 28 visitor parking spaces are proposed for 1,064 dwellings. In my view, this raises questions as to how the development will accommodate visitors to residents. It is also relevant that the scale of the proposal appears to be new territory for the applicant, with a yield approximately 300% greater than its current largest development, the Waiatarua project in Remuera (refer Appendix 3 – *Simplicity Living Capability Statement*). A more robust technical assessment is needed about the expected visitor parking demand and the applicant's methods proposed to manage that demand.
31. While visitor parking is not expressly required by the Zone Rules, I consider the issue remains relevant in assessing whether the proposal will adequately support day-to-day residential and visitor activity. In particular, the proposal's extensive internal private roading network results in few roads being vested in Council. Consequently, Council would have reduced ability to implement demand-responsive parking management measures, such as time-restricted parking, resident parking schemes, or other on-street parking controls that may aid in mitigating parking pressure.
32. While ideally many visitors may arrive via non-car modes of transport, I am not satisfied there is sufficient evidential basis to conclude that the proposed level of visitor parking will support a well-functioning urban environment for residents and their guests. Inevitably, some visitors will have no option but to travel by private vehicle. Given there appears to be limited opportunity for informal on-street parking along SH6 or Lower Shotover Road, it is still unclear where such visitors are expected to park. This issue is of most relevance during periods of concentrated visitor demand, such as

social gatherings (e.g. a birthday gathering) occurring within the applicant's proposed communal spaces.

33. Bicycle parking - More information is needed around the evidential basis for only 1 long-term bike park per dwelling. Noting that a 1-bedroom unit can hold two residents, 2-bedroom unit can hold three residents, and a 3-bedroom unit can hold four or more residents. How many people does the applicant expect to live within this development based on SLL's learnings from their other developments, and based on comparable case-study developments in the wider Queenstown area?
34. More information is needed about the applicant's travel demand management and mode-shift measures which would reduce car dependency. For example, on a development of this scale and with wrap around management (that is of the applicant's capability and delivery model) why isn't there a car-share scheme integrated into the development to help lessen household car ownership?

## Discussion/ Conclusion

35. The application proposes a significantly greater density than anticipated by the TPLM Structure Plan. This is a positive outcome that will increase the supply of much-needed affordable long-term rental housing in the region. However, the applicant's masterplan requires further refinement so that it successfully integrates into the TPLM Structure Plan and Zone. In my view, it is imperative that:
  - a) all infrastructure trigger conditions of the TPLM Zone are met (noting they currently do not appear to be – e.g., the school and northbound bus lane);
  - b) the quality and provision for amenity (including vested open space and community facilities provided within the development) exceeds that originally anticipated by the TPLM Structure Plan in recognition of the increased density proposed. This will help ensure both residents of the development and the wider surrounding area are adequately served by amenity;
  - c) free public access through the site is enabled along key active travel desire lines; and
  - d) the other matters raised in this memorandum, including height breaches, sustainability, universal access, visitor parking, bike parking, and travel demand management are satisfactorily addressed;

**Further information is required regarding how the matters raised in this memorandum will be addressed to enable a robust assessment of the proposal. At the referral application stage I can support the application from an urban design perspective but there are a number of important issues that need to be satisfactorily addressed in the substantive application, as set out in this memo.**



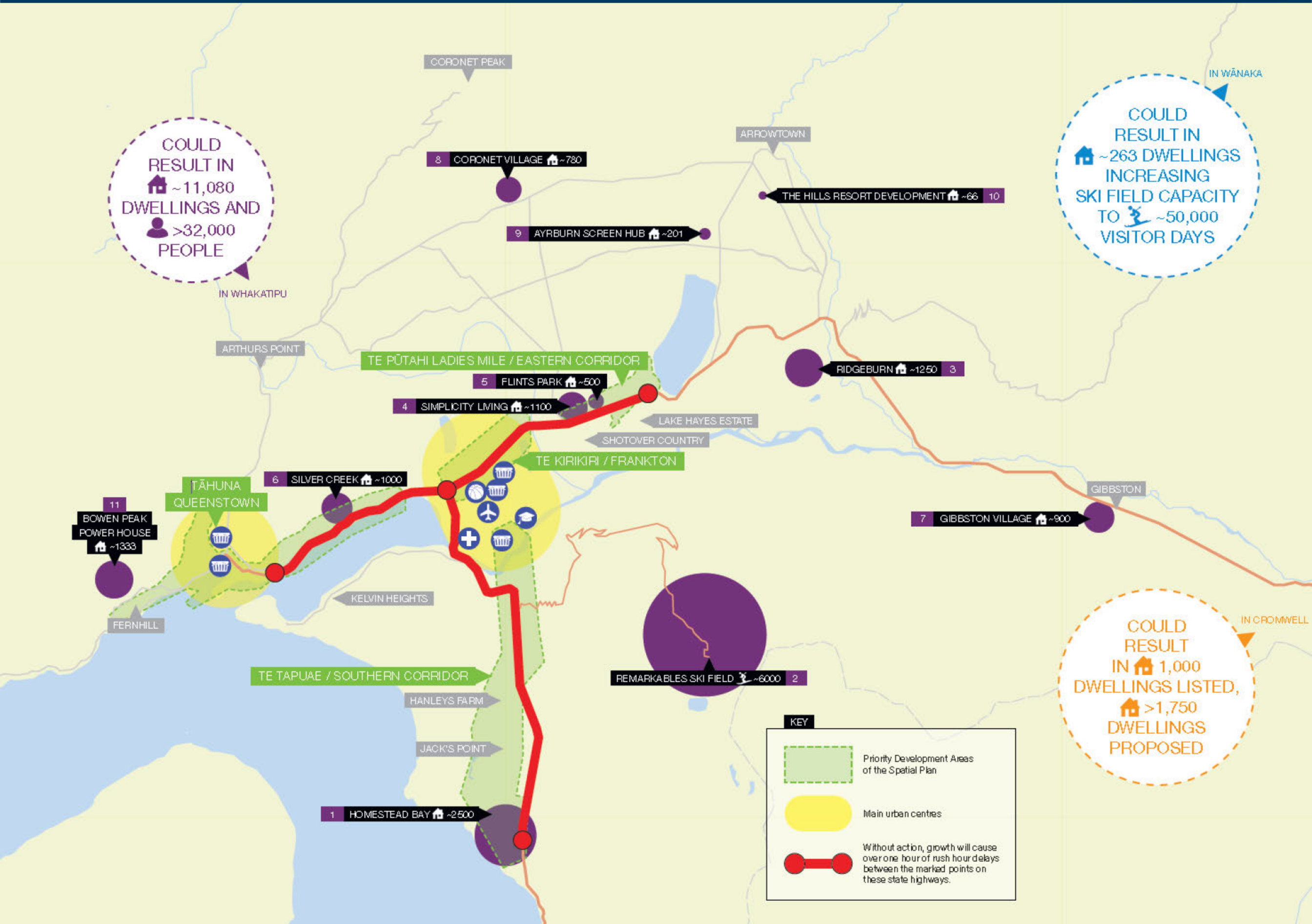
**Michael Lowe**

**Principal | Urbanist**

*For and on behalf of Studio of Pacific Architecture Ltd.*



# Queenstown Lakes - A network approach to fast tracking & growth



# Otago Central Lakes (OCL) - A network approach to fast tracking & growth

## Housing Growth & Fast track consenting

**Fast-track consenting works best when it follows a clear plan.** Without looking at the overall effects on roads, schools, and services, it can end up costing more and slowing things down.

In response to significant growth in residents, visitors, housing and commercial development OCL **has consistently approved the highest number of new residential housing consents per 1,000 residents in NZ.** With the total number of building consents approved only surpassed by Auckland and Christchurch.

QLDC already has plans in place to support growth where it makes sense. The District and Spatial Plans allow for **around 108,000 new homes**, but only about 24,000 are projected to be needed by 2055 – roughly a quarter of what's already zoned. QLDC has used every planning tool available to enable a pipeline of housing and a range of housing choices.



## Whakatipu Roding Network is already constrained from existing developments

The Queenstown Lakes road network is already under heavy pressure and congestion from existing development and growth. **All major growth routes are on state highways, so NZTA is responsible for the planning & delivery upgrades.** The busiest routes run between Te Pūtahi Ladies Mile, the Southern Corridor, Frankton, and Queenstown Town Centre. **A peak times all these routes are significantly congested. Without intervention growth is forecasted to result in greater than one hour delays on these key routes.**

People use these roads to reach work, school, the hospital, shops, and the airport – almost all in Frankton or Queenstown. **Frankton is the centre of the urban area and transport network, making it a key destination and connection point.** QLDC and its Way to Go partners have developed transport plans to manage growth, but many **projects haven't gone ahead due to limited funding. Central government money hasn't come through the usual channels, despite strong plans and business cases.** The main investments so far have come from special programmes like CIP, NZUP, and the Queenstown Package. As a result, planned transport upgrades are falling further behind schedule.

## A different approach to transport planning and investment is required

- **QLDC is one of the areas most affected by fast-track.** Despite existing plans already allowing for major growth, more than 11,000 extra homes are proposed in Queenstown Lakes and 2,500 in Cromwell through fast-track.
- Fast-track applications are assessed **one by one**, not as a whole. This means there is **no proper assessment of the combined impacts** on roads, public transport, schools, health, and other services.
- **Key state highways and bridges** (SH6A, Shotover Bridge, Kawarau Bridge) are **already at capacity** with existing development. The fast-track proposals don't address these transport limits. The network impacts are not being adequately considered.
- **Social infrastructure like schools needs much higher priority & investment.** For example, fast-track developments along Te Putahi / eastern corridor would bring forward the need for a new primary school and a high school. Planning must look at the whole picture.
- **Central and local government need better ways** to fund and build infrastructure where and when it's needed, and to ensure that the costs of building this infrastructure are borne by new developments. Right now, infrastructure is **not keeping up with growth** – and this will get worse if development happens in the wrong places.
- **Zoning or approving fast-track developments alone won't deliver affordable housing.** Policies like **inclusionary zoning** are needed so new developments actually include affordable homes.

## Fast Track Approvals Act 2024- Individual Elected Member Statement

### COUNCIL REFERENCE NUMBER: FTRA2602 Simplicity Living Ltd

#### SUMMARY OF APPLICATION

A master-planned development comprising approximately **1,064 build-to-rent dwellings**, community facilities, and a local shopping centre on a **10-hectare site** at the western end of Ladies Mile.

The development includes **39 apartment buildings**, ranging from **three to seven storeys**, delivering approximately **1,064 residential units**.

#### SUMMARY OF INFO PROVIDED WITH APPLICATION

1. *Project Site, Urban Design Statement, Project Delivery and Time Frame*
2. *Architectural plans, scheme plans*
3. *Engineering Documents: Engineering infrastructure servicing Technical Memorandum, external infrastructure concept plans*
4. *Expert Reports – geotechnical report, transport memorandum, economic report, AEE*
5. *Consultation reports*

#### IMPORTANT INFORMATION REGARDING THIS ELECTED MEMBER STATEMENT

**ELECTED OFFICIAL NAME – MELISSA WHITE - COUNCILLOR | ARROWTOWN – KAWARAU WARD**

#### ELECTED OFFICIAL STATEMENT:

I wish to raise concerns regarding the proposed Simplicity Living Te Pūtahi Ladies Mile development being considered through the fast-track approvals process.

Firstly, I acknowledge the significant housing pressures facing Queenstown Lakes and the importance of increasing housing supply and housing choice. However, I am concerned about the scale and intensity of this proposal relative to the recently completed Ladies Mile planning process and master planning work, which involved extensive community consultation over a considerable period of time.

That process was intended to provide certainty and confidence to both the community and developers about the future form and scale of development in this area. It represented a carefully considered balance between enabling growth while managing infrastructure, transport, amenity and environmental effects. I am

concerned that approving a development which significantly exceeds previously anticipated or consented limits at such an early stage risks undermining both the integrity of that process and public confidence in future planning consultations.

This proposal would effectively become the first major test case for the Ladies Mile area, and therefore sets an important precedent for future developments. It is critical that any initial developments align closely with the expectations, outcomes and infrastructure assumptions that were established through the master planning and consultation process.

I also have significant concerns regarding parking and transport effects. While the proposal references public transport integration and walkable urban design principles, the practical reality within Queenstown Lakes is that private vehicle use remains extremely high due to existing public transport limitations, commuting patterns, family needs, visitor pressures and seasonal conditions. The proposed density and scale of development, combined with limited parking provision, is likely to create substantial overspill parking issues within surrounding streets and neighbouring areas.

The cumulative transport impacts on State Highway 6, Lower Shotover Road and the wider Frankton/Ladies Mile corridor also require very careful scrutiny. While infrastructure upgrades are proposed, there remains legitimate concern about whether roading and public transport networks are sufficiently advanced to support development of this intensity in the near term.

In summary, while I support the need for additional housing supply, and strongly support the Simplicity Living model itself as exactly the type of long-term housing solution this district needs, I believe this particular proposal requires further refinement. It is essential that development within Ladies Mile proceeds in a manner that remains consistent with the outcomes of the recent community-led planning process, appropriately manages parking and transport effects, and does not establish an unsuitable precedent for future development in the corridor.

# Hon Tama Potaka

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



15 May 2026

Hon. Chris Bishop  
Minister for Infrastructure  
[infrastructure.portfolio@parliament.govt.nz](mailto:infrastructure.portfolio@parliament.govt.nz)  
Parliament Buildings  
Private Bag 18041  
WELLINGTON 6160

Tēnā koe Hon. Bishop,

Thank you for your invitation to comment on the fast-track consent application for the Simplicity Living - Te Pūtahi Ladies Mile project. The proposal includes approximately 1,100 residential units across a mix of three storey walk-up apartments and apartment buildings of five to seven storeys, and supporting physical and community infrastructure. It is located in Frankton, Queenstown.

Queenstown Lakes is one of the most expensive places in New Zealand to buy or rent a home. Despite high rates of housing construction, strong population growth makes it difficult for working households to secure affordable long-term rentals. Additional housing supply, particularly the build-to-rent model proposed, would help ease pressure on the local housing market.

Te Pūtahi Ladies Mile was identified in the Queenstown Lakes Spatial Plan as a future urban area. While the proposed height and density exceed those outlined in the district plan, the project aligns with the broader objectives of the Spatial Plan and Te Pūtahi Ladies Mile Masterplan. There is extremely limited greenfield capacity in central Queenstown, and the proposal would maximise the potential of a well-located development site.

There are transport infrastructure constraints in the area during peak hours which will need to be considered by the panel if the application is referred. The applicant has included several upgrades to transport infrastructure, including a bus lane that will support public transit provision for the surrounding area.

Overall, I am very supportive of this application being referred for consideration by the expert panel. This project would be the first large-scale build-to-rent development in Queenstown and could serve as a model for further developments.

Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in blue ink that reads 'Tama Potaka'.

Hon Tama Potaka  
**Associate Minister of Housing**

# Hon Nicola Willis

Minister of Finance  
Minister for Economic Growth  
Minister for Social Investment



11 May 2026

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

REQ-0032017

Dear Chris

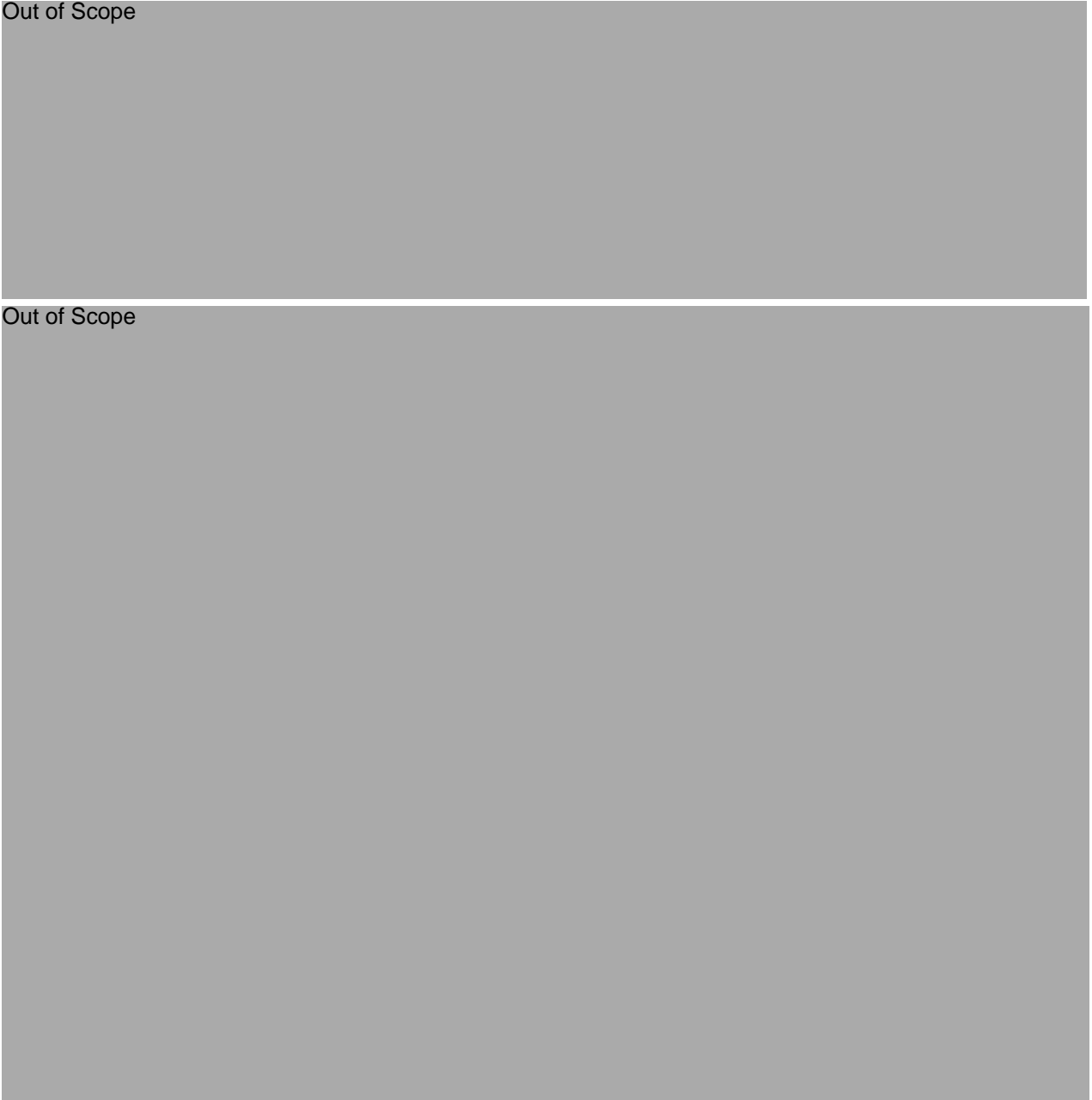
Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the following referral applications: Out of Scope [redacted]  
[redacted] Simplicity Living – Te Pūtahi Ladies Mile (FTAA-2603-1203), Out of Scope [redacted]  
[redacted]

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether the applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided.

Out of Scope



Out of Scope



Out of Scope

***Simplicity Living – Te Pūtahi Ladies Mile, FTAA-2603-1203***

This application seeks approval for a build-to-rent residential development at Te Pūtahi / Ladies Mile in Frankton, Queenstown, on approximately 10 hectares of land. The proposal comprises around 1,064 permanent rental apartments in a mix of three-storey walk-up apartments and apartment buildings of five to seven storeys, supported by neighbourhood retail, public open space to vest in Queenstown Lakes District Council, internal roads and associated infrastructure works, including upgrades to Lower Shotover Road, a new signalised intersection on State Highway 6, and three waters connections.


According to the economic evidence memorandum, the project has an approximate total development cost of \$570 million, comprising \$61.5 million for land, \$431 million for construction, \$39 million for statutory and development contributions, and contingency. The construction phase is estimated to generate \$1,006 million in total economic activity across New Zealand over 2025–2030, with employment peaking at 860 full-time equivalents

nationally in 2029. The memorandum reports total local spend of \$471.9 million, excluding land purchase. With \$753 million of the \$1,006 million (cumulative to 2030) total activity occurring within the district, this indicates that approximately 75 per cent of economic activity and employment is retained within the Queenstown Lakes District. The memorandum reports a cumulative construction-phase employment impact of approximately 3,036 full-time equivalent positions nationally across 2025–2030 (expressed as annual FTEs summed over the construction period), comprising around 1,205 direct, 1,174 indirect and 658 induced FTEs. Of these, approximately 2,277 FTEs are retained within the Queenstown Lakes District over the period.

While the quantified economic benefits are primarily concentrated during the construction phase, the project would add approximately 1,064 permanent rental apartments to the district, equivalent to 4.7 years' worth of rental supply. Upon completion, the project would support 40–50 permanent management and maintenance positions and an estimated \$381 million of broader ongoing social and economic benefits.

On this basis, the proposal appears likely to deliver significant regional economic benefits, driven primarily by the scale of construction activity and associated employment and economic activity effects, with longer-term value arising from the delivery of a substantial quantum of permanent rental housing and associated urban infrastructure.

Out of Scope



Out of Scope

Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis  
**Minister for Economic Growth**



15 MAY 2026

NGCOR2660

Hon. Chris Bishop  
Minister for Infrastructure  
[c.bishop@parliament.govt.nz](mailto:c.bishop@parliament.govt.nz)

Dear Minister,

Thank you for the invitation to provide comments on the application for referral of the Simplicity Living - Te Pūtahi Ladies Mile project to an expert panel (the Panel) under section 17 of the Fast-track Approvals Act 2024 (FTAA).

I note that the site of the proposal is near the Shotover River, which is protected by the Water Conservation (Kawarau) Order 1997 (WCO) under Part 9 of the Resource Management Act 1991. The WCO requires water quality in the Shotover River mainstem to be managed to contact recreation standards. The project will increase development in the area and proposes infrastructure solutions that could result in wastewater discharges to the Shotover River.

The referral application has not identified the potential applicability of the WCO and there is some risk if the substantive application also does not include an assessment, there may be delays to the Panel's deliberations.

You may wish to use your discretion to specify information that is required to be provided with the substantive application under section 27(3)(b)(ii) of the FTAA, including:

- a. Assessment of the proposal's consistency with the requirements of the Water Conservation (Kawarau) Order 1997.

In light of the current concerns raised by the community about Queenstown Lakes District Council's management of the Shotover Wastewater Treatment Plant<sup>1</sup>, you may also wish to invite additional parties to comment on the proposal at the substantive stage under 27(3)(b)(iii), including:

- a. Lake Hayes and Shotover Country Community Association
- b. Queenstown Lakes Community Action
- c. Aotearoa Water Action

Requiring additional analysis against the WCO early will reduce the risk of unanticipated significant matters being identified late in the process and support the smooth and efficient conduct of the Panel's decision-making.

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<sup>1</sup> <https://www.rnz.co.nz/news/environment/593449/community-group-alarmed-by-shotover-river-s-spike-in-e-coli-council-opens-investigation>

Thank you again for the opportunity to provide comments on this referral application.

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Hon Nicola Grigg  
**Minister for the Environment**

## Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Simplicity Living - Te Pūtahi Ladies Mile
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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](mailto: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.		
<b>Organisation name</b>	Department of Conservation	
<b>*First name</b>	Emily	
<b>*Last name</b>	Bayliss	
<b>Postal address</b>	PO Box 10420, Wellington 6140	
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>
<b>*Email</b>	<a href="mailto:Fast-track@doc.govt.nz">Fast-track@doc.govt.nz</a> ; s 9(2)(a)	

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

### Manager's signoff

Jenni Fitzgerald

18 May 2026

## Director-General of Conservation s17 comments

<b>Project name</b>	Simplicity Living - Te Pūtahi Ladies Mile
<b>Applicant name</b>	Simplicity Living Ltd
<b>Application number</b>	FTAA-2603-1203
<b>Project summary details</b>	<p>Establish a comprehensively master-planned residential neighbourhood that will deliver a 'Build To Rent' development community in Queenstown. The Project will deliver approximately 1100 new homes supported by community facilities, transport infrastructure, open space, and a local commercial centre.</p> <p>The subject site has an area of approximately 10.01 hectares, and is located at 12 Lower Shotover Road, along Te Pūtahi Ladies Mile, Queenstown. The application includes works external to the site including upgrades to SH6 and surrounding roading network, and the installation of three waters infrastructure on Crown land.</p>



FIG 1: PROJECT SITE, INCLUDING INFRASTRUCTURE WORKS ON CROWN LAND, DERIVED FROM APPLICATION (APPENDIX 1)

## 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(e) of the Fast-track Approvals Act 2024 (the Act).
- 1.1.2 The applicant undertook limited engagement with DOC on the identified relevant aspects of the application prior to lodging their referral application. The Applicant first approached DOC 20 March and advice was provided on 2 April (with the referral application being lodged 31 March). As such, the period available to respond and engage did not enable DOC to provide in-depth feedback prior to the applicant lodging the referral application.
- 1.1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels in relation to approval(s).
- 1.1.4 The referral application indicates the project may require approvals under the Conservation Act 1987 for works within Crown owned reserves, and the Wildlife Act 1953 for activities related to lizards, vegetation and birds.

## 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. Based on the information available, DOC has not identified any reason why this project should not be referred.
- 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, as outlined in the tables below.

Section 21(3), (4) and (5) 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 s 5 of the FTAA. DOC has specifically considered ss 5(1)(i), (j) and (k) and has not directly identified any aspect of the project that would meet the definition.
21(3)(c)	Is there adequate information to inform a decision	DOC considers there is adequate information to inform a referral decision in relation to the concession and wildlife approval aspects of the application.
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: <ul style="list-style-type: none"> <li>• a Treaty settlement;</li> <li>• Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019;</li> <li>• Marine and Coastal Area (Takutai Moana) Act 2011.</li> </ul>	DOC has not identified any inconsistency with any relevant settlement or other obligation, subject to any comments from Treaty partners under s 17(1)(d). However, there may be considerations relevant to the project under the Ngāi Tahu Claims Settlement Act.
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 approvals referenced should not be considered under the FTAA process.
21(5)(c)	Would the project have significant adverse effects on the environment	In relation to the conservation approvals sought, DOC considers adverse effects can likely be managed through conditions and management plans. In relation to the conservation approvals sought, DOC considers adverse effects can likely be managed through conditions and management plans.
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 in relation to conservation Acts. The applicant has included a record of compliance history with respect to a Resource Management Act 1991 breach in Section 1.4.2 of their Referral Application
21(5)(g)	Would a substantive application have any competing applications	DOC has not identified any competing applications for the conservation approvals relating to the DOC administered areas in our BAU permissions system. It is noted that Queenstown Cable Car, was accepted to the Fast-track in April 2026 (ref FTAA-2510-1124) and intends to undertake works within the same parcel of PCL.

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

## UNCLASSIFIED

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 conservation approvals of this nature would typically take three to four months to process, which is not significantly longer than the FTAA process is expected to be. 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?	The project does not address a significant environmental issue.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	Relevant local or regional documents include the Otago Conservation Management Strategy 2016. The concession sought as part of this application does not appear inconsistent with that strategy.  In principle the broader proposal does not appear inconsistent with the CMS, however analysis of this in more detail would be undertaken as part of reviewing substantive application documents.
22(b)	Any other matters the Minister may consider as relevant?	None identified. Given the high level of affects assessment supplied at referral stage, DOC encourages the applicant's engagement with DOC in relation to all conservation approvals prior to the lodgement of any substantive application.



Jenni Fitzgerald  
Fast-Track Applications Manager

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

Date: 18 May 2026

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

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

<b>Project name</b>	Simplicity Living – Te Pūtahi Ladies Mile
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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](mailto: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.			
<b>Organisation name (if relevant)</b>	NZ Transport Agency		
<b>*First name</b>	Nicola		
<b>*Last name</b>	Foran		
<b>Postal address</b>			
<b>*Contact phone number</b>	§ 9(2)(a)	<b>Alternative</b>	
<b>*Email</b>	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application
<p>The New Zealand Transport Agency Waka Kotahi (NZTA) thanks the Minister for the opportunity to comment on the referral of this application in to the fast-track approvals process.</p> <p><b>Te Putahi Ladies Mile Zone Density Discussion</b></p> <p>The Te Pūtahi Ladies Mile Zone (TPLM) chapter does not specifically state a maximum number of dwellings that can be constructed within the TPLM Zone; however, the Final Report and Recommendations dated 29 April 2024 stated that the provisions would enable around 2,100 – 2,400 dwellings to be established within the TPLM Zone. It is noted that the applicant is proposing 1,100 dwellings which is approximately half of the volume of dwellings anticipated within this Zone, however the proposed site is significantly less than half of the area of the Zone.</p> <p>The transport infrastructure upgrades as required by this chapter were developed to service the anticipated 2,100-2,400 dwellings as per the Final Report and Recommendations. NZTA has significant concerns that if this level of density was to be proposed across the entirety of the Zone (anticipated 5000-6000 dwellings), then the existing SH6 infrastructure, with the additional transport infrastructure upgrades required by this chapter, cannot function efficiently and effectively without further significant mode shift and trip capture interventions. NZTA has significant concerns that the vehicle movements associated with this higher level of density will cause congestion and result in vehicles being unable to exit developments onto the state highway network. The unanticipated cumulative effect of high-density residential development within the TPLM zone is that development will gridlock the state highway and result in people being unable to get to required locations, noting this would also result in emergency</p>

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services being unable to freely navigate the state highway to attend incidents. NZTA considers this could have a major effect on Queenstown's economy and in particular the tourism sector if people are unable to get access to the state highway network and subsequently to desired locations

NZTA requests that the substantive application includes an assessment of the potential effect of the proposed yields on the existing and proposed transport infrastructure and whether this is sufficient to service the proposed development, including the cumulative impacts of a higher density than was anticipated and assessed in the TPLM Zone provisions.

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roading Powers Act 1989 (GRPA). The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest. While the proposed development as per this application does not exceed the anticipated 2,100-2,400 dwellings, however if granted, this application would set a precedent for acceptable yields in the TPLM Zone. NZTA requires that any development beyond the anticipated 2,400 dwellings within the TPLM Zone provide an assessment of the potential effects of the development on the functionality of the local road and state highway network and propose robust mitigation measures, including the opportunity for mode shift, to address these concerns.

### **Proposal**

NZTA has had previous engagement with the Simplicity Living regarding this proposal, this has occurred in the form of pre application meetings with the applicant's planning consultant and email correspondence. The information provided at the time was also assessed by internal NZTA subject matter experts.

### **NZTA Comments**

#### Transport Infrastructure Upgrades

The AEE and the ITA have conflicting information as to what transport infrastructure upgrades are to be constructed by the applicant as a part of this proposal. NZTA notes that the applicant should deliver all transport infrastructure upgrades relevant to the sub area as identified Standard 49.5.39 of the TPLM chapter. These include the following:

- Access intersection from at least one of Lower Shotover Road / Spence Road or Collector Road A at Stalker Road
- Upgraded Lower Shotover Road at Spence Road intersection
- Bus stops on State Highway 6, Stalker Road intersection (one on each side of State Highway 6)
- Signalisation of Stalker Road / State Highway 6 intersection, including at-grade pedestrian and cycle crossings across both roads.
- Active Travel link to State Highway 6 bus stops at Stalker Road Intersection.
- Dedicated westbound bus lane on State Highway 6 from Howards Drive to Shotover Bridge (part of Queenstown Package)
- State Highway 6 eastbound bus lane from State Highway 6A to Hawthorne Drive and State Highway 6 westbound bus lane from Hardware Lane to State Highway 6A (part of Queenstown Package)
- Stalker Road northbound bus priority lane south of State Highway 6

The substantive application should clearly identify all of the relevant transport infrastructure upgrades required and proposed to be delivered by Simplicity Living.

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It is noted that Standard 49.5.39 requires the bus lane to be constructed from the intersection of Howards Drive intersection to the Stalker Road intersection, and the applicant is proposing to partially construct this bus lane. NZTA has previously been sent an infrastructure plan which identifies that Clarke Group shall be responsible for the construction of the bus lane from the Stalker Road intersection to the Howards Drive intersection. NZTA would require that the applicant include within the substantive application a formal agreement between the two parties which identifies who is responsible for delivering which sections of the bus lane. Additionally, NZTA notes, that from the Stalker Road intersection west to the Shotover Road bridge the bus lane shall consist of painting the bus lane lines on the existing carriageway. However, the bus lane from the Stalker Road intersection west towards Howards Drive shall require an assessment to confirm that the pavement is of suitable strength for the proposed traffic types and volumes. Should this assessment identify that the pavement is not suitable, then the applicant shall be responsible for the repaving and painting of the bus lane to a suitable standard.

The development plans show the active travel link along the frontage of the property, extending south over SH6 and connecting to the existing shared use path located on the southern side of SH6. It also shows the active travel link continuing down to the proposed upgraded intersection of Lower Shotover and Spence Road. It is presumed that cyclists would then continue down Spence Road and connect to the existing Queenstown Trail to get access to Frankton. NZTA notes that QLDC should consider whether there is sufficient infrastructure down Spence Road to ensure that this active travel link is continued as this connection is essential to ensure cyclists will be directed away from the state highway network.

Appendix 4 – Project Delivery and Timeframe Report does not specify when the transport upgrades will be delivered in the context of the wider project timeline. The QLDC Proposed District Plan requires that these upgrades are to be completed prior to any development on site. NZTA considers that it is necessary for these transport upgrades to be completed prior to any physical occupation of either a retail or residential dwelling. NZTA would require that the applicant propose a condition which ties the requirement for the transport upgrades to be completed to the appropriate trigger, such as code of compliance or a certificate of occupation etc.

In order to deliver the above, the applicant will need to enter into a developer agreement with NZTA. The developer agreement will outline both the applicant's and NZTA's roles and responsibilities. The applicant shall be financially responsible for the design, physical works, quality assurance, safety audit and any consenting, statutory approvals associated with this process and any additional requirements and NZTA will be responsible for review and sign off of the design and statutory approval processes as the road controlling authority and the implementation of the construction within the state highway.

#### Subdivision Design

The applicant should consider the approved subdivision and residential development plans on Lot 2 Deposited Plan 463532 which is located on the eastern boundary of the subject site. The subdivision design should provide for connectivity to neighbouring development to provide for throughfare and reduce congestion on the collector road.

#### High School Provision

In accordance with the QLDC Proposed District Plan more than 1,100 residential dwellings within the zone prior to the operation of a high school within the zone is a restricted discretionary activity. It is noted that 287 dwellings are consented on Lot 2 Deposited Plan 463532 and various existing dwellings within the Zone and therefore this development will trigger this rule. The applicant has advised that consideration has been given to this rule.

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The requirement for a high school means that trip generation from the TPLM Zone would be lower as less traffic will be existing and entering the site during peak hours for school drop off. NZTA considers the operation of a high school is important to address congestion concerns as a result of high-density development of the Zone.

The applicant shall provide an assessment of all consented dwellings with the zone, and should the proposed development go beyond the 1,100 dwelling trigger, NZTA would require an assessment of potential effects of the development on the transport infrastructure should a high school not be provided. Alternately, the applicant can provide proof that an agreement with the Ministry of Education that a high school has been committed to and/or designated.

#### Servicing Infrastructure

NZTA has had previous discussions with the applicant regarding a new wastewater pipe to be installed on Lower Shotover Bridge. Based on the infrastructure memo it appears that the development is no longer proposing a new pipe and will connect to the existing wastewater line along the bridge. NZTA would be required to review a detailed design of the connection including trenching, backfilling and reinstatement works where these impact on the state highway. The design must be reviewed and approved by NZTA prior to any works occurring.

#### Additional Information Required

NZTA would expect that the substantive application includes a comprehensive Integrated Transport Assessment; that includes, but is not limited to the following:

- (i) Identifies the existing capacity of the local road network and SH6 to service traffic associated with both the project while it is carried out and the resulting development; and
- (ii) Identifies potential cumulative effects of the higher density development than was anticipated and assessed in the TPLM Zone provisions on the local road network and SH6; and
- (iii) Identifies any upgrades to the local road network and SH6 that are required to service the traffic identified in (i) and mitigate any cumulative effects identified in (ii), and whether these are sufficient to deal with increased yields above what was anticipated and assessed in the TPLM Zone provisions; and
- (iv) Identifies any funding required to carry out those upgrades (including who will provide that funding); and
- (v) Contains information on discussions held, and agreements made, between the authorised person and QLDC or NZTA (or both) about transport infrastructure (including discussions and agreements about the matters referred to in subparagraphs (i) to (iv))"

NZTA welcomes the opportunity to discuss the proposal further with the Applicant and 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 18 May 2026

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