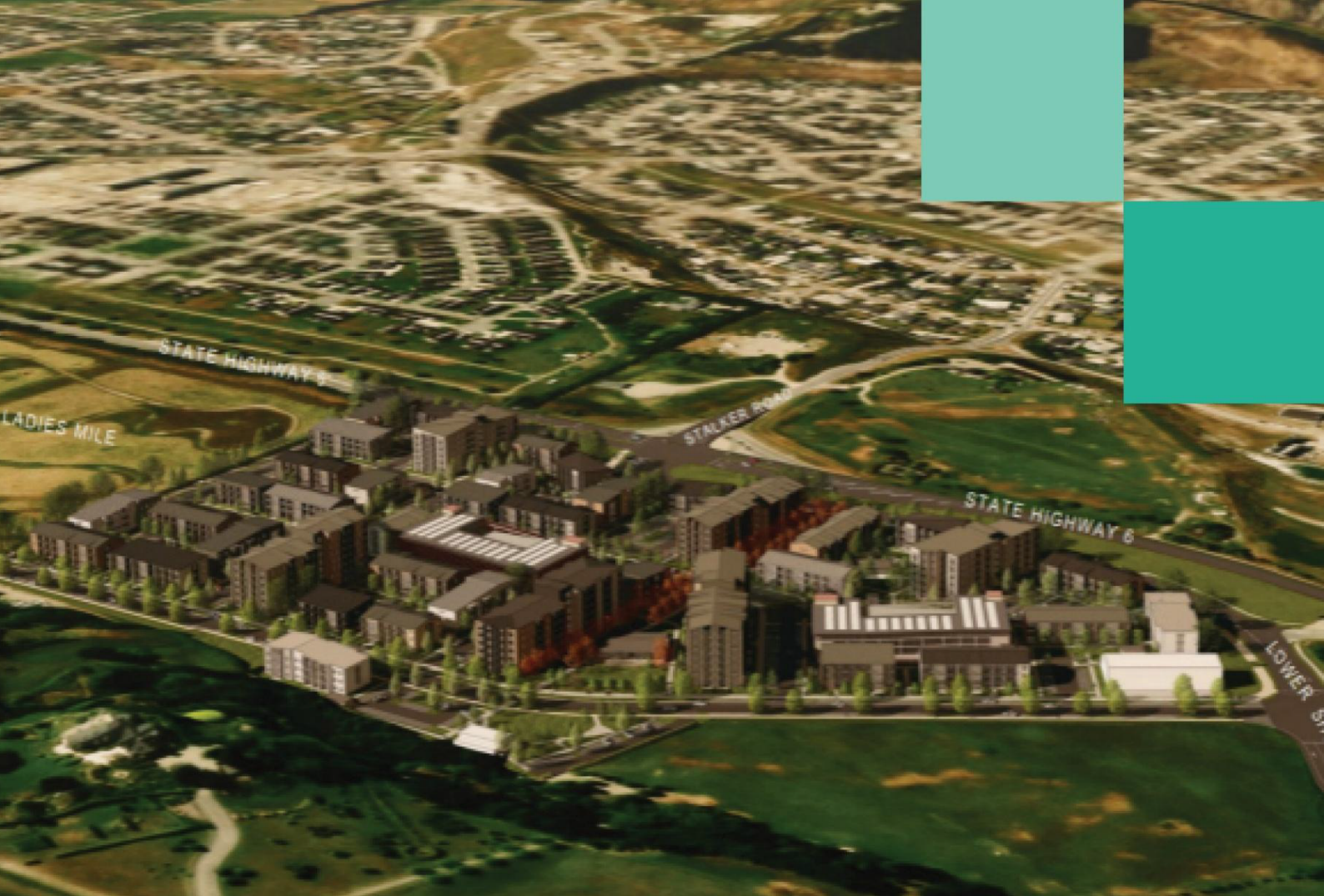




Fast-track Approvals Act 2024 Substantive Application

Simplicity Living Te Pūtahi Ladies Mile

Prepared for Simplicity Living Limited • August 2026

Quality control

Title:	Fast-track Approvals Act 2024 Substantive Application
Client:	Simplicity Living Limited
Job number:	720422
Prepared by:	Summer Denize, Senior Planner
Signature:	
Reviewed by:	Joanne Skuse, Principal Planner
Signature:	
Legal Review:	Russell McVeagh

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PART 1 – APPLICATION OVERVIEW

1 APPLICANT & PROPERTY DETAILS

	Fast Track Approvals Substantive Application
Applicant:	Simplicity Living Limited
Agent:	Jo Skuse Principal Planner The Property Group Limited (TPG) 027 498 1745 jskuse@propertygroup.co.nz
Address for service:	The Property Group Limited PO Box 349 Queenstown, 9348 Attention: Jo Skuse
Site address:	12 Lower Shotover Road
Legal description:	Lot 3 DP 606744; Section 9 SO 485598; Lot 2 DP 617529
Owner of site:	Simplicity Living Limited; Donald Neil Jackson, Grant William Stalker
Consent for:	Fast-track approvals for the 'Simplicity Block' development for the following activities: • Subdivision consent • District land use consent for: ○ Residential development ○ Buildings ○ Three waters infrastructure ○ Earthworks for external infrastructure ○ Transport • Regional land use consent for carrying out residential earthworks including discharging stormwater run-off and contaminants onto land • Certificates of Compliance for permitted activities under the Otago Regional Plans • A concession under the Conservation Act 1987 for the installation, operation and maintenance of a public water supply pipeline within DOC-administered marginal strip land • A Wildlife Approval under the Wildlife Act 1953 for the capture, handling, temporary holding and relocation of indigenous lizards associated with the public water supply infrastructure works

Enclosed:

Application

Legal Considerations

Appendix A - FTAA Referral Application Notice of Decision

Appendix B - Capability Statement

Appendix C - Architectural Drawing Set

Appendix D - Architect's Statement

Appendix E - Strategic-level Urban Design Assessment

Appendix F - Landscape Effects Assessment

Appendix G - Landscape Drawings

Appendix H - Acoustic Assessment

Appendix I - Integrated Transport Assessment

Appendix J - Transport Peer Review

Appendix K - External Infrastructure Report and Drawings

Appendix L - Civil Engineering Infrastructure Report

Appendix M - Economic Impact Assessment

Appendix N - Geotechnical Interpretive Report

Appendix O - Operational Waste Management Plan

Appendix P - Lizard Habitat Assessments

Appendix Q - Records of Title, Consent Notices and Easements

Appendix R – Site Ownership Confirmation

Appendix S - Resource Consent Decision RM260467

Appendix T - Adjacent owners and occupiers

Appendix U - Consultation Report

Appendix V - TPLM PSI

Appendix W - Earthworks district/regional application RM260566 / RM26.282

Appendix X - Project Delivery and Timeframe Report

Appendix Y - Proposed Conditions of Consent

Appendix Z - Rule Compliance Assessment

Appendix AA - Objectives and Policies Assessment SD update numbering in application

Appendix BB - TPLM Heritage and Archaeological Values Assessment

Appendix CC - s30 letter and ORC response

Appendix DD - Letter authorising TPG

2 STATEMENT OF QUALIFICATIONS

The following is a statement of the qualifications and experience of the Planners involved in preparing this Substantive Application.

The qualifications and experience of the specialists involved are set out in their respective individual reports.

Joanne Skuse

I am a Principal Planner with the Property Group Limited and an Associate Member of the New Zealand Planning Institute. I hold a LLB Honours Law Degree from the University of Exeter, UK.

I have over nine years of professional planning experience across local government and consultancy roles, with work spanning policy development, resource consent processing, and the preparation of planning evidence for hearings and the Environment Court. My experience includes contracting to Gore District Council, Southland District Council, Invercargill City Council, and Queenstown Lakes District Council, where I worked within complex planning environments involving both urban areas and sensitive landscape settings. This has required consistent application of higher-order planning instruments, including National Policy Statements and National Environmental Standards, across a wide range of consent types.

My resource consent and Fast Track consenting experience covers large-scale and technically complex proposals such as solar farm infrastructure, medium-density residential development, and subdivision applications. In my council roles, I have been responsible for processing subdivision consents and issuing Section 223 and 224(c) certificates under delegated authority. My role as a Principal Planner, has included providing advice to councils during resource consent hearings and Environment Court mediation proceedings, and preparing substantive decisions under delegation.

My work has also included master planning for large development proposals, involving engagement with communities, councils, and key stakeholders. I have experience leading notified applications, supporting multi-disciplinary teams, and managing joint applications to regional councils.

I confirm that, in my capacity as an author and reviewer of this Substantive Application, I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with the Code in the preparation of this report.

Summer Denize

I am a Senior Planner with The Property Group Limited and an Associate Member of the New Zealand Planning Institute. I hold a Bachelor of Science from the University of Otago, majoring in Geology and Ecology.

I have over eight years' experience as a planner in New Zealand, working in both local government and planning consultancy environments. My experience includes resource consent processing, preparation of resource consent applications, planning advice, and assessment of projects under a range of resource management legislation and planning frameworks.

Throughout my career, I have worked within unitary, regional and district planning environments, including experience with Christchurch City Council, Marlborough District Council and Environment Canterbury. I have also provided planning consultancy services to public and private sector clients on a wide range of residential, commercial, infrastructure, environmental and urban development projects.

I confirm that, in my capacity as an author of this Substantive Application, I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with the Code in the preparation of this report.

3 EXECUTIVE SUMMARY

3.1 Purpose of the Application

This report, supported by Legal Considerations, forms part of the Substantive Application lodged on behalf of Simplicity Living Limited (“SLL” or “the Applicant”) for the referred Project, Simplicity Living - Te Pūtahi Ladies Mile (the Project). It has been prepared in accordance with sections 42, 43 and 44 of the FTAA to support the Substantive Application.

The Project will deliver an integrated residential development, including subdivision and associated land use for a comprehensively designed multi-unit development at 12-14 Lower Shotover Road, Queenstown, together with associated transport and three waters infrastructure. The Project includes subdivision, residential development, a local shopping centre, and associated enabling works.

For the purpose of this Application, the Site comprises all land subject to the approvals sought, including the residential development area legally described as Lot 3 DP 606744, Lot 2 DP 617529 and Section 9 SO 485598 (total area 10.0053ha), together with areas of legal road and Crown land required for the associated transport and infrastructure works.

The Project is a referred Project that was accepted under section 21(1) of the Fast-track Approvals Act 2024 (FTAA). A copy of the Notice of Decision is attached as **Appendix A**. This report has been prepared by The Property Group Limited on behalf of SLL, who is the authorised person under section 42(1) of the FTAA.

This Substantive Application seeks to progress a uniquely community focused development at Te Pūtahi Ladies Mile (TPLM), centred on SLL's build-to-rent model and delivered at a scale that can make a meaningful difference to Queenstown's housing pressures. The Project will have significant regional benefits for Queenstown and will significantly increase housing supply and housing choice in the area. If fast-track approvals are granted, SLL intends to commence construction immediately and deliver the Project by 2030. The Project is anticipated to generate expenditure of approximately \$919 million in total economic activity across New Zealand over 2025-2030. The Project will also contribute 912 FTE years over the construction period. Post-construction, the Project is expected to support 40–50 permanent full-time staff through ongoing property management and maintenance associated with the build-to-rent model.

The Project seeks approvals through the FTAA process for activities that would otherwise require authorisation under the Resource Management Act 1991 (RMA), Conservation Act 1987 and Wildlife Act 1953. The approvals sought comprise district and regional consents for the proposed residential development, subdivision, transport and three waters infrastructure, and associated external infrastructure earthworks. The application also seeks a concession for a public water supply pipeline within Department of Conservation (DOC) administered marginal strip land, and a Wildlife Approval relating to the management of indigenous lizards.

The actual and potential effects of the Project are assessed within this application and are supported by a comprehensive suite of technical reports prepared by appropriately qualified specialists. The proposed conditions have been developed with input from those technical specialists to ensure the adverse effects of the Project are appropriately managed. With the

mitigation and conditions proposed, all adverse effects will be appropriately avoided, remedied or mitigated to be no more than minor overall.

The Project will generate significant positive effects and significant regional benefits through the delivery of 1,085 long-term rental homes, increased housing choice, substantial investment in transport and three waters infrastructure, and significant economic benefits during both the construction and operational phases of the development. The Project will also support the efficient use of urban land and infrastructure within a strategically identified growth area and contribute to a well-functioning urban environment.

The Project has been assessed against the relevant statutory documents, including national policy statements, regional and district planning documents, the Water Conservation (Kawarau) Order 1997, and relevant iwi management plans. Overall, the Project is considered to be consistent with the strategic direction of these documents and gives effect to the planned urban growth outcomes anticipated for TPLM. The assessment also concludes that the Project is consistent with relevant iwi planning documents and would not breach obligations arising under Treaty settlement legislation.

Overall, the Project will deliver substantial regional benefits through the provision of housing, infrastructure and economic investment. Having regard to the purpose of the FTAA, the Project's adverse effects are not considered sufficiently significant to be out of proportion to those benefits. The Project is therefore considered appropriate for approval under the FTAA.

SLL is seeking approvals for this Project through the fast-track process to provide greater certainty around timing and delivery. The Project is already well advanced in its design, infrastructure-aligned, and genuinely shovel-ready - thereby enabling construction to commence at pace as soon as approvals are secured.

3.2 The Applicant

The Applicant and authorised person for the Project is SLL. SLL develops affordable housing designed for long-term residency in a build-to-rent model. The company's core objective is to increase the supply of well-designed homes that support community wellbeing while maintaining long-term ownership and stewardship of its developments. This approach enables a consistent focus on quality, liveability, and long-term performance of residential environments rather than short term market outcomes. This development model incentivises careful design, robust construction, and ongoing investment in the quality of the living environment for residents.

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

- Kupenga Apartments, located in Point England, Auckland. 132 apartments offering one-three-bedroom units on a 1.125 hectare site. Fully leased.

- Reiputa Apartments, located in Mt Wellington, completed mid-2026. 297 apartments offering one- to three-bedroom units on a 1.326 hectare site. Available for rent now (80% already leased).
- Morningside Apartments located Morningside Drive, Auckland. Consent has been granted for the construction of 264 apartments offering one-three-bedroom units, scheduled for completion in late 2027.

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

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

3.3 Project Overview

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

- 1,085 residential units in a mix of three-level walk-up apartments and five to eight-level apartment blocks
- Four resident community buildings and a communal space on the top level of building 30, including work-from-home spaces, indoor recreation and family spaces
- Various pergola and BBQ spaces
- Two car parking buildings, providing 600 carparks including 6 electric vehicle (EV) charging stations, in addition to 505 on-street carparks
- Resident and visitor cycle parking
- A leasing office and café
- A commercial / retail lot for a local shopping centre
- A local park with the possibility of being publicly ¹_{OBJ} and available
- Internal roading, pedestrian and cycle connections, and landscaping
- New and upgraded transport and three waters infrastructure

¹ This refers to the proposed Lot 7 which is intended to be used for recreation purposes. This lot may be vested in Queenstown Lakes District Council (QLDC) if it is eligible for development contribution credits.

- Fee simple subdivision to create development lots, park, and roads to vest

The Project masterplan is shown in Error! Reference source not found. below.



FIGURE 1: THE PROJECT MASTERPLAN. SOURCE: ARCHITECTURAL DRAWING SET. SEE APPENDIX C FOR FULL PLAN SET.

3.4 Summary of Approvals Sought

This application seeks all approvals that would otherwise be required under the RMA, the Conservation Act, and the Wildlife Act. These approvals comprise resource consents under section 42(4)(a) of the FTAA, certificates of compliance under section 42(4)(c), a concession approval under section 42(4)(e), and a Wildlife Approval under section 42(4)(h).

The approvals sought are summarised below in **Table 1** and are addressed in further detail in the relevant sections of this report.

TABLE 1: SUMMARY OF APPROVALS SOUGHT

FTAA section	Equivalent legislation	Approval sought	Activity status
s42(4)(a)	RMA s9(2)	Regional land use consent for earthworks that contravene the Otago Regional Plan: Water for Otago	Restricted discretionary
s42(4)(a)	RMA s15(1)	Discharge permit for discharges associated with earthworks that contravene the Otago Regional Plan: Water for Otago	Restricted discretionary
s42(4)(a)	RMA s9(3)	District land use consent for activities that contravene the QLDC Proposed District Plan (PDP)	Non-complying

s42(4)(a)	RMA s11(1)	Subdivision consent under the QLDC PDP	Non-complying
s42(4)(c)	RMA s139	Certificates of Compliance for regional activities that comply with the permitted activity standards of the Otago Regional Plan: Water for Otago and Otago Regional Plan: Air for Otago	Permitted activity
s42(4)(e)	Conservation Act 1987	Concession to construct, install, operate, maintain and access a public water supply pipeline within DOC-administered marginal strip land adjoining the Shotover River	N/A
s42(4)(h)	Wildlife Act 1953	Wildlife Approval for the capture, handling, temporary holding and relocation of indigenous lizards associated with the proposed works	N/A

To avoid uncertainty, this application seeks all approvals necessary for the Project.

3.5 Structure of the Application

This Application has been structured to align with the requirements of sections 42, 43 and 44 of the FTAA, while avoiding unnecessary duplication between the various approvals sought.

The Application is structured into three main parts:

Part 1 – Application Overview provides the common information relevant to all approvals sought, including details of the Applicant, Site and surrounding environment, the proposed development, and the supporting technical assessments.

Part 2 – Approval-Specific Requirements addresses each approval sought through this Substantive Application. Separate sections are provided for the resource consents sought under the RMA, the concession sought under the Conservation Act 1987, and the Wildlife Approval sought under the Wildlife Act 1953. These sections address the relevant statutory information requirements and include the assessment of effects relevant to that approval.

Part 3 – Integrated Assessment provides a consolidated assessment of the Project as a whole, including consultation, proposed conditions of consent, and assessment of the Project against the FTAA decision-making framework.

This structure has been adopted to ensure that information relevant to more than one approval is addressed in a single location, providing a clear and efficient assessment framework while satisfying the relevant information requirements of the FTAA, the RMA, the Conservation Act, and the Wildlife Act.

3.6 Technical Reports/ Plans

SLL has engaged a team of experienced technical specialists to assess the potential effects of the Project and support this Substantive Application. The following technical reports and design plans have been prepared and are included as part of this application:

- Architectural Drawing Set, prepared by Brewer Davidson, dated 30/07/2026 (**Appendix C**)
- Architect's Statement, prepared by Brewer Davidson, dated 25 July 2026 (**Appendix D**)
- Strategic-level Urban Design Assessment, prepared by Boffa Miskell, dated 21 July 2026 (**Appendix E**)
- Landscape Effects Assessment, prepared by Boffa Miskell, dated 15 July 2026 (**Appendix F**)
- Landscape Drawings, prepared by Greenwood Associates, dated 17/07/2026 (**Appendix G**)
- Acoustic Assessment, Revision 2.1, prepared by Bladon Bronka Acoustics, dated 28/07/2026 (**Appendix H**)
- Integrated Transport Assessment, prepared by Bartlett Consulting, dated July 2026 (**Appendix I**)
- Transport Modelling Technical Memorandum, prepared by BBO, dated 22 July 2026 (included within **Appendix I**)
- Transport Peer Review, prepared by Don McKenzie Consulting, dated 3 August 2026 (**Appendix J**)
- External Infrastructure Report and Drawings, prepared by BBO, dated 26 June 2026 (**Appendix K**)
- Civil Engineering Infrastructure Report, Civil Engineering Drawings and Environmental Management Plan, prepared by McKenzie & Co, dated 14 July 2026 (**Appendix L**)
- Economic Impact Assessment, prepared by Shamubeel Eaqub, dated 28/06/2026 (**Appendix M**)
- Geotechnical Interpretive Report, prepared by ENGEO, dated 16/07/2026 (**Appendix N**)
- Operational Waste Management Plan, prepared by WM New Zealand (**Appendix O**)
- Lizard Habitat Assessments, prepared by Wildlands Consultants Limited, reference 8026 and 8026b, dated July 2026 (**Appendix P**)

3.7 Key Findings

The Project will deliver a comprehensive build-to-rent residential neighbourhood within the TPLM urban growth area, comprising 1,085 long-term rental homes, a local shopping centre lot, resident community facilities, open space, internal transport connections, subdivision, earthworks, and associated three waters and transport infrastructure. The development is intended to respond directly to Queenstown's identified housing pressures by providing a substantial supply of professionally managed, long-term rental accommodation in a strategic urban growth location. The key findings are as follows:

- The Project will provide a significant increase in housing supply and choice, including approximately 45% one-bedroom, 48% two-bedroom, and 7% three-bedroom apartments. The build-to-rent model is intended to provide secure, long-term rental accommodation for permanent residents rather than short-term or visitor accommodation.

- The Project will deliver substantial positive economic effects, including approximately \$919 million in total economic activity across New Zealand over 2025–2030, approximately 912 FTE local jobs during the construction period, and 40–50 permanent full-time roles associated with ongoing property management and maintenance.
- The Project will increase pressure on the surrounding transport network, with modelling showing increased traffic volumes and delays on State Highway 6 (SH6) and nearby intersections. These effects have been mitigated as far as practicable through the proposed package of transport upgrades, including the signalised intersection upgrades, bus priority measures, and active travel improvements. SLL's transport experts consider that SLL is making a fair and reasonable contribution towards the infrastructure required to support development in TPLM. While some residual traffic delays are expected to remain, any adverse transport effects are considered to be outweighed by the substantial positive effects and regional benefits of the Project, including significant housing delivery, infrastructure investment, economic benefits, and the establishment of a well-connected urban neighbourhood within a strategic growth area.
- Several of the proposed three waters upgrades are already identified within QLDC's wider infrastructure planning for TPLM. The Project will bring these works forward by enabling SLL to fund and deliver the necessary upgrades ahead of QLDC's current programme. Public infrastructure delivered as part of the Project will be vested in QLDC, providing long-term infrastructure benefits for the wider growth area.
- Landscape, open space and amenity outcomes are central to the design. The Project includes a central north-south green spine, interconnected network of pocket parks, pergola and BBQ areas, communal buildings, shared paths, and a larger local park with the potential to vest with QLDC.
- The commercial component will provide a neighbourhood-scale local shopping centre lot at the corner of Lower Shotover Road and proposed east-west collector Road C1, together with the reuse of an existing residential unit to the north of Road C1 as a leasing office and café. These elements are intended to support day-to-day needs of residents and contribute to a walkable mixed-use neighbourhood.
- Construction-related effects, including noise, vibration, sediment, dust and construction traffic, are proposed to be managed through conditions and management plans, including an Environmental Management Plan (EMP), Erosion and Sediment Control Plan (ESCP), Construction Noise and Vibration Management Plan (CNVMP) and Traffic Management Plan (TMP).
- The subdivision is intended to follow the comprehensive land use development and will create six superlots, comprising five fee simple development lots, a commercial development lot, five road lots, and a local purpose reserve with the potential to vest in QLDC, together with easements to secure public access, infrastructure and internal access arrangements.
- Overall, the assessment concludes that the Project's adverse effects can be appropriately avoided, remedied or mitigated through the proposed design measures, infrastructure upgrades, management plans and conditions of consent. Having regard to the scale of housing delivery, strategic infrastructure investment, economic benefits and community outcomes the Project will provide, any residual adverse effects are not considered

sufficiently significant to outweigh the Project's benefits. The Project is therefore considered consistent with the purpose and intent of the FTAA.

4 SITE CONTEXT

4.1 Site Description

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

The residential development area is situated northeast of the commercial centre of Frankton, Queenstown, along SH6. Error! Reference source not found. below shows the residential development area within the existing environment. The residential development area is 10.0053ha and is predominantly covered by pastoral grasses, with scattered shrubs and trees, shelterbelts, and an established line of liquidambar trees associated with an existing internal accessway. The landform is generally flat to gently undulating. An earth bund extends along parts of the frontage to Lower Shotover Road and Frankton-Ladies Mile Highway. The land is currently utilised for grazing and contains an existing building to the north (also referenced as a 'barn' in the expert reports).

Access to the residential development area is currently provided via vehicle crossings from Lower Shotover Road and Frankton-Ladies Mile Highway. Both crossings are proposed to be removed and the kerb line reinstated as part of the development. An unformed legal road traverses the northern portion of the residential development area in an east-west direction.

In addition to the residential development area, the Site includes land required for transport and three waters infrastructure works. These works are located within formed and unformed legal road, and Crown land, comprising marginal strip adjoining the Shotover River. The location and extent of these areas are shown in **Figure 3**.

The Site does not contain any rivers, streams, watercourses, wetlands, lakes or other waterbodies. The residential development area is currently largely undeveloped and contains limited internal infrastructure. Existing infrastructure within and adjoining the residential development area is described in the Civil Engineering Infrastructure Report attached as **Appendix L**.

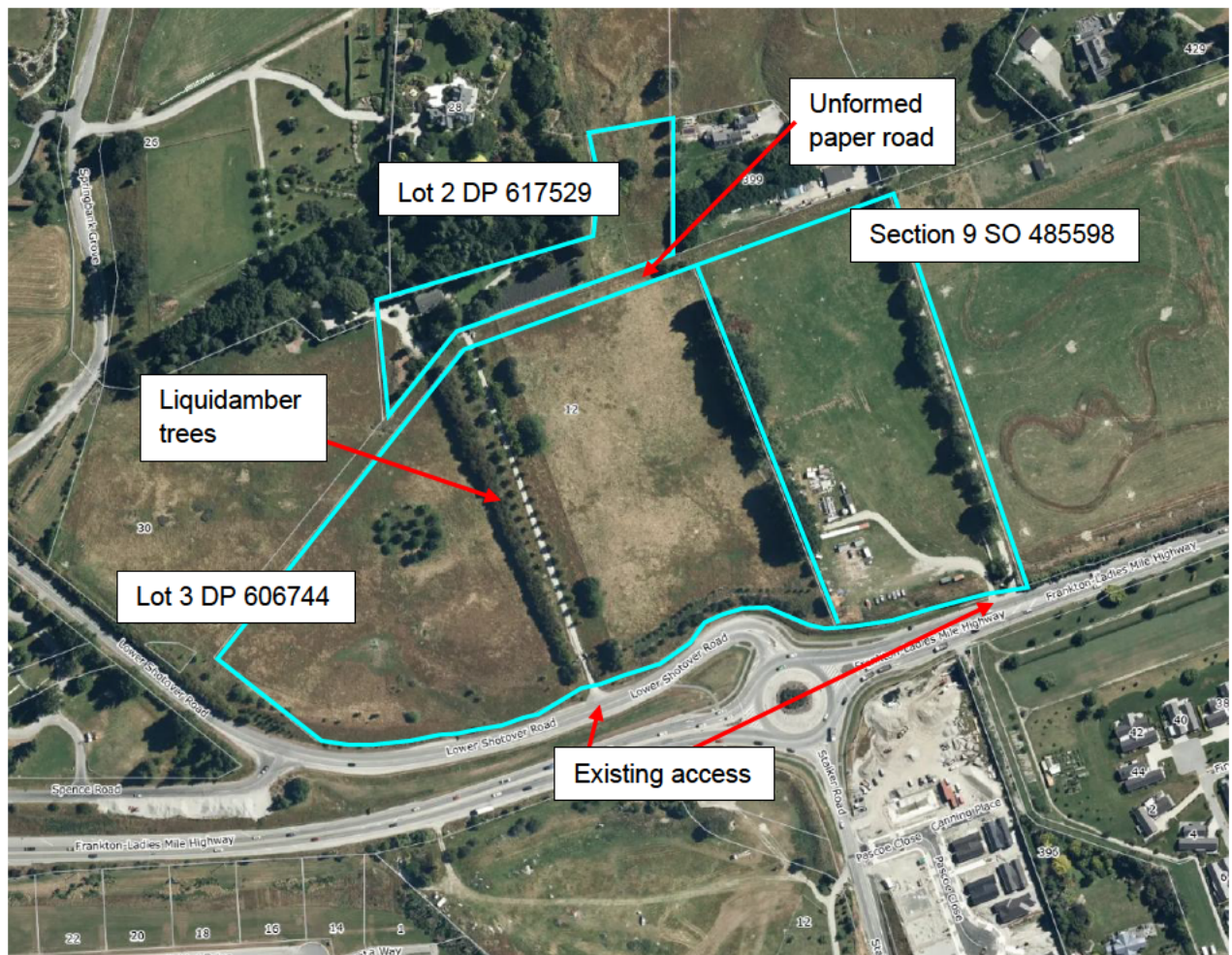


FIGURE 2: PRIMARY DEVELOPMENT AREA OUTLINED IN BLUE. SOURCE: GRIP MAPS.

TABLE 2: LAND PARCELS WITHIN THE SITE

Record of Title Details				
<i>Title Reference</i>	<i>Legal Description</i>	<i>Area (Ha)</i>	<i>Owners</i>	<i>Occupiers</i>
1194482	Lot 3 DP 606744	6.1412	Simplicity Living Limited	Vacant
1142422	Section 9 SO 485598	2.9467	Donald Neil Jackson, Grant William Stalker	Vacant
1238571	Lot 2 DP 617529	0.9174	Simplicity Living Limited	Vacant
N/A – Parcel ID 3128172	Crown Land Block III Shotover Survey District	19.8711	Crown Land, marginal strip managed by DOC	Vacant
N/A – Legal Road (SH6)	N/A	N/A	NZTA as asset owner	Vacant
N/A – Legal Road	N/A	N/A	QLDC as asset owner	Vacant
1194481	Lot 2 DP 606744	2.3898	Roman Catholic Bishop of the Diocese of Dunedin	Vacant
1194483	Lot 4 DP 606744	0.0292	Jameson NZ Holdings Limited	Vacant

4.1.2 Legal Instruments

Several legal instruments are registered on the respective titles. These are summarised below, and are attached within **Appendix Q**. None of these instruments preclude development of the Site. Where removal or amendment is required, this will be addressed through separate legal processes.

As the removal of consent notices cannot be achieved through the FTAA process, a separate resource consent application (reference RM260566) has been lodged with QLDC seeking the removal of the relevant consent notices. As of the date of this application RM260566 is still being processed by QLDC.

Consent Notices

A number of consent notices currently apply to the development area, reflecting earlier subdivision approvals and the former planning context of the land. In particular:

- Consent Notice 12669287.3, registered against Lot 3 DP 606744 (RoT 1194482) currently requires all future residential units to be contained within a single residential building platform, reflecting the land's former rural lifestyle zoning. With the recent (2024) TPLM Plan Variation rezoning the land for urban development, this restriction is now outdated. Removal of this consent notice is therefore being sought under RM260566.
- Consent Notice 13434438.6, registered against Lot 2 DP 617529 (RoT 1238571) requires future development to provide a site-specific stormwater design, participate in any private infrastructure management entity, ensure continuity of that entity, and install compliant firefighting water supply. These conditions relate to an earlier subdivision consent and are tied to interim, private-serviced development. They are not relevant to the Project, which will be fully connected to public reticulated water, wastewater, and proposes an integrated stormwater network. Once the wider development proceeds under new consents and all services are vested or connected to QLDC infrastructure, this consent notice will effectively become obsolete and/or can be complied with.
- Consent Notices 7620262.11 and 876500, registered on Section 9 SO 485598 (RoT 1142422) have carried over from earlier subdivisions. They are not relevant to the land within the project area, and their removal is being sought under RM260566.

Easements

Subdivision of the TPLM development requires part of the land to vest as public road with QLDC. Vested road and reserve land must be free of encumbrances. LINZ cannot deposit the subdivision plan unless every dominant owner of any covenant or easement affecting the road land gives their consent.

The instruments registered over the residential development area include:

- **Deed 834400.3** – Water Supply Covenant (653 titles)
- **Transfer 834400.2** – Easement to convey water (20 titles)
- **Deed 838259.3** – Water supply covenant (651 titles)
- **Transfer 838259.2** – Easement to convey water (645 titles)
- **Deed 850246.4** – Water supply covenant (646 titles)
- **Transfer 850246.3** – Easement to convey water (18 titles)
- **Deed 850246.7** – Water supply covenant (646 titles)
- **Transfer 850246.6** – Easement to convey water (18 titles)

All relate to the same historic water schemes.

The historic water covenants and easements were created in the early 1990s to operate a private rural water supply scheme serving land south of SH6. The scheme relied on a bore, pump, tank and pipework located on land now owned by SLL north of SH6 (Section 9 SO 485598). Water was pumped uphill to a tank and gravity-fed back under SH6 to rural properties that lacked QLDC reticulation. This scheme has been fully decommissioned following installation of QLDC's reticulated network for Shotover Country, and the infrastructure on Section 9 SO 485598 no longer functions. The covenants and easements are therefore obsolete but remain registered over hundreds of titles, preventing the collector road from vesting. SLL will apply to

the High Court to extinguish the instruments so the collector road can vest in QLDC free of encumbrances.

Additional easements exist on the Site, providing provision of access and water supply to properties to the north. With the inclusion of vested Road C1, containing new trunk infrastructure, easements can be re-routed and the same level of service, or improved service will be provided to the currently benefited land.

The removal of all necessary easements to enable vesting is included as a condition of consent.

4.1.3 Adjoining Landowners

In accordance with clause 5(1)(d) of Schedule 5 of the FTAA, a list of the owners of land adjacent to the Site is provided in **Appendix T**. A map of the land adjoining the Site is illustrated in **Figure 4**.

The Applicant has identified the owners of adjacent land using publicly available property records. Occupier information is not publicly available through LINZ or council databases. Reasonable enquiries have been undertaken, including site observation and review of publicly accessible records.

As detailed in Section 12, engagement has been undertaken with the relevant landowners, local authorities, and administering agencies, including QLDC, New Zealand Transport Agency Waka Kotahi (NZTA), ORC and DOC, in relation to these works. A summary of the consultation undertaken is included with this application at **Appendix U**.

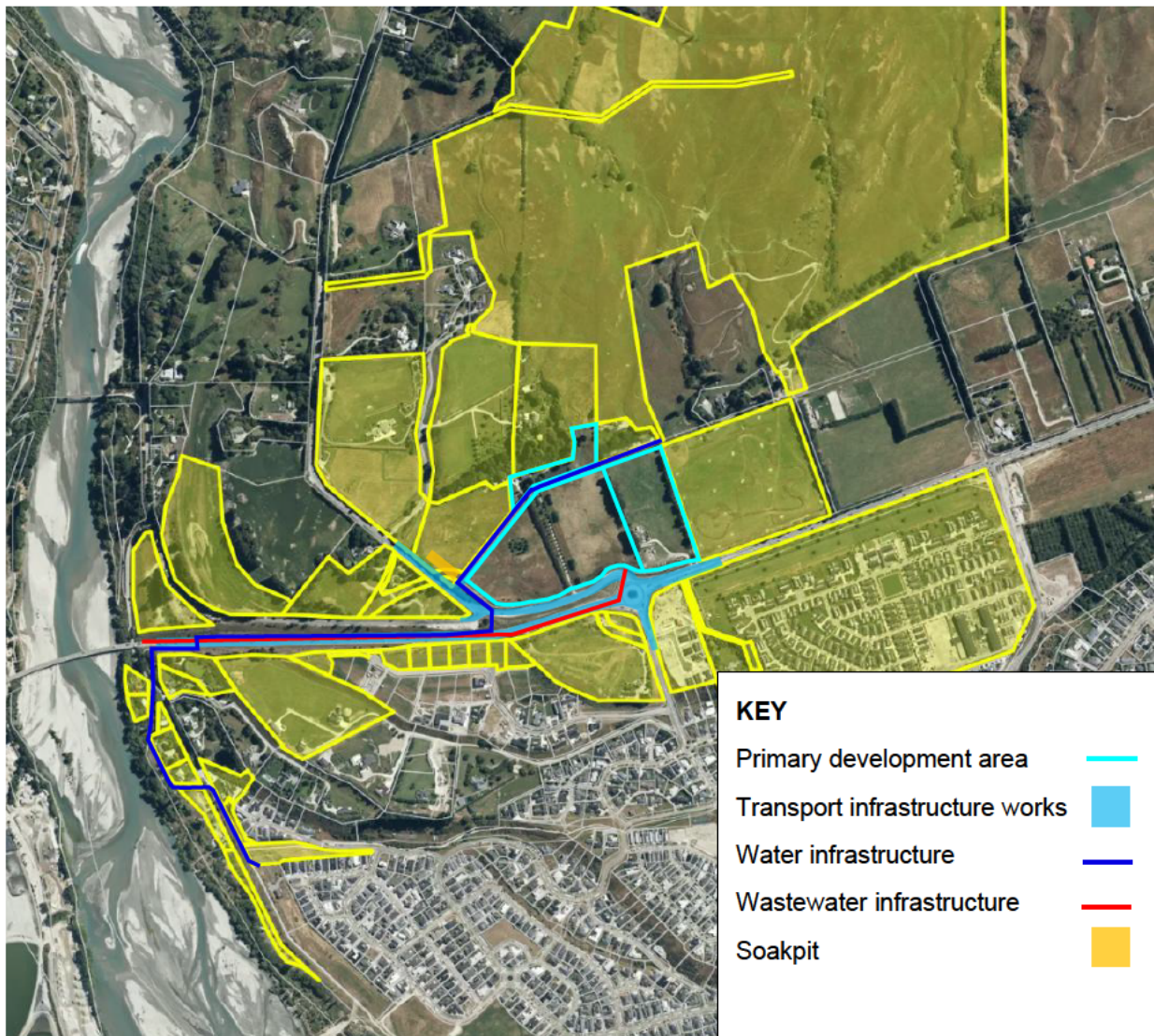


FIGURE 4: ADJOINING SITES HIGHLIGHTED IN YELLOW. SOURCE: GRIP MAPS.

4.2 Location Context

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

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

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

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

The environment is therefore anticipated to change significantly in anticipation of extensive urban expansion, as part of a broader strategic development framework. The surrounding environment comprises similarly sized lots within the TPLM Zone which are subject to their own designs and consenting processes.

4.3 Cultural Environment

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

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

- A Crown apology restoring the relationship between Kāi Tahu and the Crown
- Formal acknowledgment of Kāi Tahu's relationship with, and the significance of, Aoraki
- Cultural redress through legal instruments that recognise customary associations and enable Kāi Tahu participation in environmental management
- Economic redress, including asset transfers, purchase options, and a perpetual Right of First Refusal over specified Crown assets within the Kāi Tahu takiwā

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

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

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

4.4 District Plan Context

4.4.1 Overview

The residential development area sits within the TPLM area, a special-purpose zone established through the TPLM Plan Variation to the QLDC PDP. This rezoning covers around 120 hectares of former rural, rural lifestyle, and large lot residential land along both sides of SH6 between the Shotover River and Waiwhakaata Lake Hayes. It enables predominantly low, medium and high density residential development, as well as smaller local commercial areas specifically intended to support Queenstown's strategic growth needs by increasing housing supply, improving housing diversity, and contributing to greater affordability across the district.² This is further supported by the expansion of the urban growth area that now includes the TPLM Zone.

TPLM has long been identified as a strategically important growth area due to its proximity to Queenstown, access to SH6, and capacity to accommodate urban development *at scale*.

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

The overarching purpose of the TPLM Plan Variation is to facilitate significant residential growth to address Queenstown's housing shortage. The TPLM Plan Variation establishes a clear and deliberate shift in land use within the TPLM Zone, especially on the northern side of SH6, recognising that a transition from predominantly pastoral landscape to a dense urban environment is both anticipated and necessary to meet the minimum density requirements of the area.

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

The TPLM Structure Plan (Error! Reference source not found. and Error! Reference source not found. below) provides a clear strategic framework that not only enables development within TPLM, but actively encourages high quality, high density, integrated urban outcomes. Development within this area is a key component of the district's growth strategy and plays an essential role in delivering new housing, supporting community wellbeing, and shaping a sustainable urban environment for the future.

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

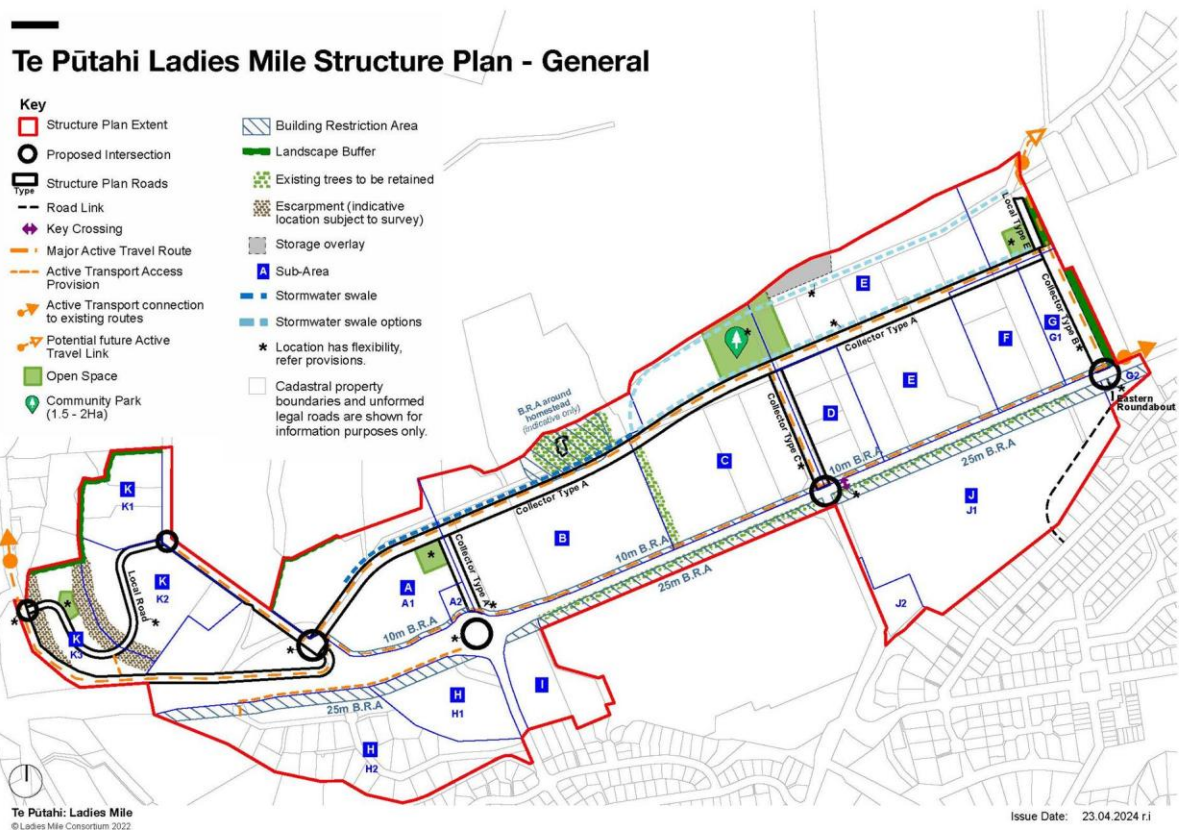


FIGURE 5: TPLM STRUCTURE PLAN. SOURCE: QLDC PDP



FIGURE 6: TPLM STRUCTURE PLAN – BUILDING HEIGHTS. SOURCE: QLDC PDP

4.4.2 Zoning and Overlays

The majority of the proposed residential development is within the TPLM Zone, a Special Purpose Zone within the PDP, with a small section of the development area on the southern boundary identified as a Local Shopping Centre Zone. Infrastructure and transport works are proposed on land within the Rural Zone, and unzoned road parcel. See **Figure 7** below for the extent of zoning over the Site.

In addition, the majority of the proposed residential development area is identified as TPLM – Medium Density Residential Precinct, Sub-area A and Sub-Area B as identified within the TPLM Structure Plan, and is partially subject to a Building Restriction Area overlay affecting the section of the Site adjacent to Lower Shotover Road and SH6. See **Figure 8** below which shows the extent of the Medium Density Residential Precinct and Building Restriction Area.

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

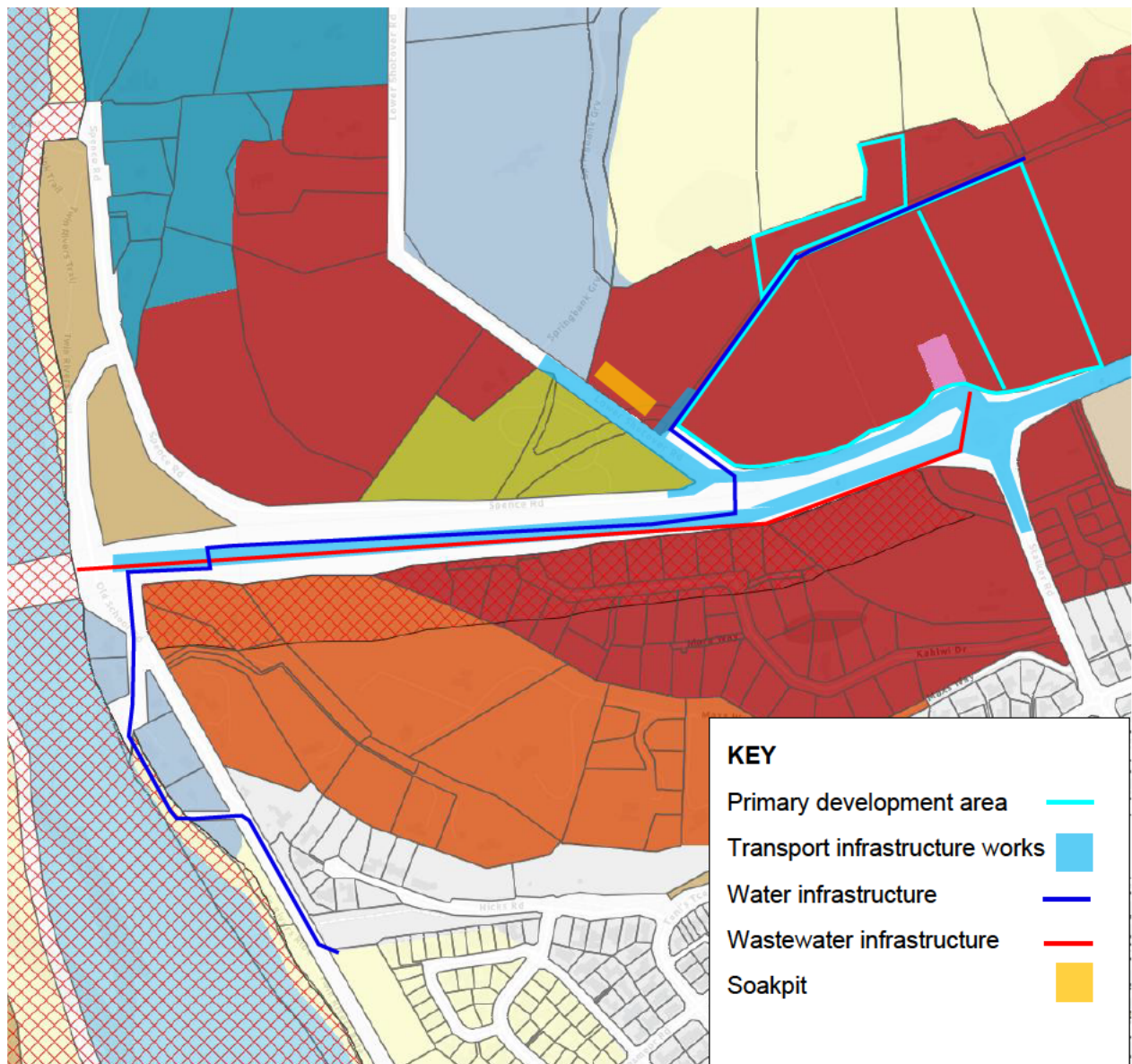


FIGURE 7: PDP ZONING. RED = TPLM ZONE, PINK = LOCAL SHOPPING CENTRE ZONE. LIGHT YELLOW = RURAL ZONE. WHITE = UNZONED ROAD. SOURCE: QLDC PDP.

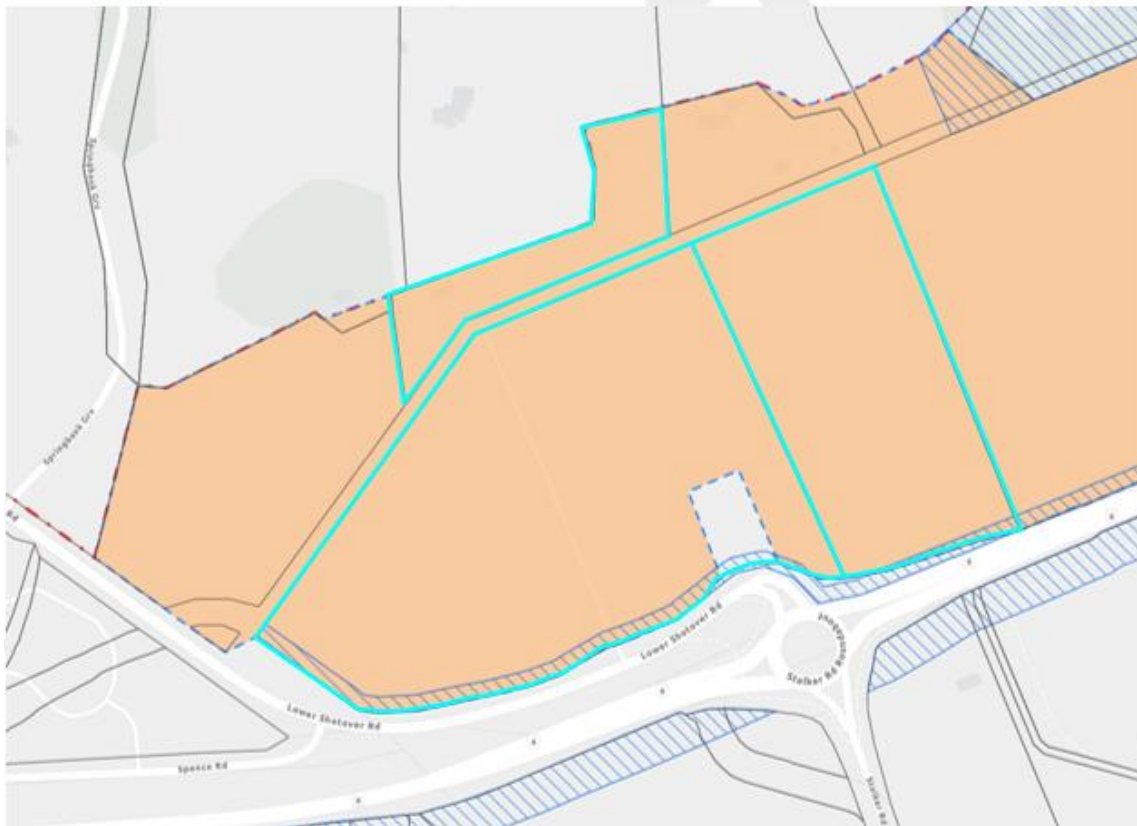


FIGURE 8: SUBJECT SITE OUTLINED IN LIGHT BLUE. ORANGE = TPLM – MEDIUM DENSITY RESIDENTIAL PRECINCT, BLUE DASH = BUILDING RESTRICTION AREA. RED DASHED LINE = URBAN GROWTH BOUNDARY. SOURCE: QLDC PDP.

4.5 Strategic Planning and Housing Context

4.5.1 QLDC Spatial Plan (2021)

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

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

enable increased height and density in locations with good access to public transport or where there is relative demand for housing.

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

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

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

4.5.2 Queenstown Lakes Homes Strategy (2021)

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

The Homes Strategy identifies that despite high levels of residential construction, the housing being delivered is predominantly higher-value dwellings, and the current market is lacking in sufficient affordable or workforce housing to meet community needs. It recognises the critical role of planning and development in improving housing outcomes, including through enabling a broader mix of housing typologies and supporting increased densities in appropriate locations.

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

4.5.3 Queenstown Lakes Joint Housing Action Plan 2023-2028

The Queenstown Lakes Joint Housing Action Plan 2023–2028 (the Action Plan) builds on the Homes Strategy and was prepared by the Grow Well Whaiora Partnership, which is a

partnership between Central Government, Kāi Tahu, Otago Regional Council (ORC) and QLDC. The Action Plan provides a coordinated, multi-agency response to the district's housing challenges.

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

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

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

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

4.5.4 Housing and Business Development Capacity Assessment (2025)

The Queenstown Lakes District Housing and Business Development Capacity Assessment 2025 (HBA) provides an important evidence base for understanding housing demand, housing supply, and development capacity within the district. While the HBA identifies sufficient plan-enabled housing capacity in the medium and long term, it also identifies a short-term shortfall of approximately 1,000 dwellings, driven primarily by infrastructure constraints within the Whakatipu Ward, where the Project sits.

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

The Project will deliver housing within a strategic growth area identified as suitable for more intensive urban development. It contributes to addressing the short-term housing shortfall identified in the Whakatipu Ward, and coordinates development with infrastructure delivery in

an accessible location. The Project is designed as a build-to-rent model for long-term rental occupation, and provides a range of housing sizes, supporting increased housing choice, market competition and affordability.

QLDC's referral comments considered that aspects of the Project, including transport infrastructure, education, open space provision and certain elements of the development layout, are not fully aligned with the TPLM Structure Plan. These matters are addressed in the relevant sections of this application. Notwithstanding those matters, the Project remains consistent with the broader housing outcomes identified by the HBA through the delivery of a substantial increase in housing supply, housing choice and supporting infrastructure within a strategic growth area. When considering the broader TPLM the wider development, SLL will help facilitate the success of the wider TPLM, including facilities such as schooling and commercial areas. The key purpose of the TPLM is to provide for an increase in housing density, which is met by this Project.

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

4.6 Natural Hazards

Extensive review of potential natural hazards was undertaken by QLDC at the time of the plan variation to re-zone the TPLM.

In addition, natural hazard investigations have been undertaken to inform the proposed development, including site-specific geotechnical and flood assessments. The proposed residential development area is not subject to any significant natural hazard constraints identified in the ORC Natural Hazards Portal. The entire development area is identified within the ORC *Liquefaction Awareness Area – Domain A: Liquefaction Potential: Low to None* and contains areas mapped as Ground Classification D (deep or soft soil) and Ground Classification B (rock). Site-specific investigations indicate that groundwater occurs at significant depth below the ground surface and that the residential development area is generally underlain by loess, alluvial sands and gravels.

A Geotechnical Interpretive Report prepared by ENGEO is attached as **Appendix N**. The assessment included geotechnical investigations, laboratory testing and geotechnical hazard assessments. The Geotechnical Report addresses matters including subsurface ground conditions, liquefaction susceptibility, slope stability, foundation conditions, earthworks and groundwater. The assessment concludes that liquefaction and lateral spreading are not considered a risk to the residential development and confirms that the development area is suitable for the proposed development subject to implementation of the recommended engineering measures.

The 2D flood modelling and stormwater assessment undertaken by McKenzie & Co (included within the Civil Engineering Infrastructure Report attached as **Appendix L**) identifies existing overland flow paths across the residential development area and inform the proposed stormwater management approach, including attenuation, disposal and exceedance flow management measures. The flood and stormwater assessments demonstrate how flood hazards will be managed through the detailed design of the development.

Further details regarding natural hazards and the management of hazard-related effects are provided in the Geotechnical Interpretive Report and Civil Engineering Infrastructure Report contained in **Appendix N** and **L**.

4.7 Contaminated Land

A review of available contaminated land information has been undertaken, including the ORC Selected Land Use Register (SLUR) and the Preliminary Site Investigation (PSI) prepared as part of the TPLM Plan Variation process (attached as **Appendix V**). The PSI was undertaken across the wider TPLM growth area to assess the suitability of the land for future urban development. The investigation reviewed available SLUR and Hazardous Activities and Industries List (HAIL) records, historical aerial photography, and current and historic land uses to identify any areas potentially affected by contamination.

The PSI concluded that no HAIL activities were identified within the residential development area or transport infrastructure works associated with this application. The residential development area, along with the transport infrastructure works is therefore not considered to be actually or potentially contaminated land for the purposes of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS).

A review of the SLUR undertaken as part of this application identified several recorded HAIL sites in the vicinity of the proposed water supply infrastructure works, as shown in **Figure 9**.



FIGURE 9: HAIL SITES RELATIVE TO THE SITE SHOWN AS RED SHADING. EXISTING WELLS SHOWN AS TRIANGLES. SOURCE: ORC SLUR.

These sites include:

- **54 Old School Road (HAIL.01119.01)**, associated with the storage of machinery, where limited investigations identified slightly elevated arsenic concentrations.
- **22 Hicks Road (HAIL.01236.07)**, where an arsenic hotspot was previously identified and subsequently excavated and remediated.
- **16-21 Hicks Road (HAIL.01236.02)**, where previous investigations identified elevated arsenic concentrations and low levels of historic pesticides, including DDT and dieldrin.

While these sites are located in the vicinity of the proposed watermain works, they are adjacent to, rather than within, the proposed alignment. The proposed watermain corridor does not traverse any recorded HAIL site and based on the available information, the likelihood of contaminated material being encountered is considered low.

Notwithstanding this, given the proximity of the proposed watermain works to several recorded HAIL sites, a condition of consent requires works to cease and an unexpected contamination discovery protocol to take place, to manage the unlikely event that contaminated material is encountered during earthworks. Refer to Section 11 for the proposed conditions of consent.

4.8 Existing Infrastructure

Stormwater

The residential development area is currently largely undeveloped from a three waters servicing perspective and does not contain existing stormwater infrastructure. In the absence of an established on-site stormwater network, stormwater is understood to generally follow existing ground levels and natural drainage patterns. There are no rivers, watercourses or wetlands within the Site, and the existing stormwater context is therefore limited to overland flow and downstream receiving environments beyond the Site boundaries.

Wastewater

The residential development area is not currently connected to public wastewater infrastructure. QLDC GIS information identifies an existing public wastewater network on the southern side of SH6, approximately 60 metres from the residential development area. This includes a 375mm diameter main, together with 150mm and 300mm mains in the same general location, which convey wastewater flows west towards the Shotover Wastewater Treatment Plant. A 150mm diameter rising main stub is also located within Section 9 SO 485598, near the SH6 / Stalker Road roundabout. The existing 300mm diameter rising main on the southern side of SH6 is understood to operate intermittently at approximately half capacity due to the degraded condition of the eastern corridor³.

Water

The residential development area does not currently have a connection to the public water supply network, and there are no existing fire hydrants within the immediate vicinity. QLDC GIS information identifies a 150mm principal water main south of the Stalker Road roundabout, and an existing 63mm lateral within an adjacent site. Some bores are also located within the Site. Additional water supply infrastructure, including fire hydrants, will therefore be required to service the development and provide appropriate firefighting coverage.

4.9 Surrounding Environment, Key Infrastructure & Existing Consents

4.9.1 Existing Environment

The existing environment comprises the Site and its wider surroundings, including existing land uses, built form, landscape character, transport connections, infrastructure and amenity values that may influence, or be affected by, the Project. This section establishes the receiving environment against which the Project's actual and potential effects are assessed.

The Site and its physical characteristics are described in detail in the preceding sections. In summary, the residential development area remains predominantly undeveloped and retains a

³ The TPLM/Eastern Corridor is the wider urban growth area east of the Shotover River comprising TPLM and the established communities of Shotover Country, Lake Hayes Estate and Bridesdale Farm.

largely open, pastoral character, with existing vegetation comprising principally pasture, shelterbelts and established exotic trees. Existing built development within the Site is limited, although the wider area includes established rural-residential development, transport infrastructure and the expanding urban area of Frankton to the west.

The residential development area forms part of TPLM, an identified urban growth area extending along the northern side of SH6. Although much of the area currently retains its former rural appearance, its planning context has materially changed. The land is zoned and structurally planned for urban development, and physical development and infrastructure construction are beginning to occur within adjoining parts of the growth area.

SH6 forms the principal transport corridor along the southern edge of TPLM. Lower Shotover Road, Stalker Road and Spence Road provide the existing local-road connections relevant to the Site. Existing walking, cycling and public-transport facilities are presently limited relative to those required to support the urban development anticipated within the area.

The residential development area is not currently connected to a comprehensive public three-waters network. Existing public wastewater and water-supply infrastructure is located principally to the south of SH6, as described in the Existing Infrastructure section above. Stormwater currently follows the Site's existing contours and natural overland-flow paths, with no established on-site public stormwater network.

The existing landscape and amenity context reflects the transition occurring within TPLM. The residential development area retains an open character and a visual relationship with Slope Hill, while the wider environment is increasingly influenced by existing urban development, SH6 and the infrastructure and development activities associated with the planned urbanisation of the corridor.

The above matters establish the factual receiving environment. In addition, a series of resource consents has established a strategic infrastructure and development framework for adjoining land.

As some of those approved works have not yet been fully implemented, they are addressed separately in the following section rather than being treated collectively as part of the existing physical environment.

4.9.2 Consented Development and Strategic Infrastructure Integration

TPLM is an emerging urban growth area in which development and the delivery of strategic infrastructure are already underway. A series of resource consents, particularly for the land at 429 Frankton–Ladies Mile Highway, known as Flint's Park, has progressively established the subdivision, transport, active-travel and three-waters framework for the wider area.

Not all approved works have yet been constructed and, accordingly, they are not treated collectively as part of the existing physical environment described above. Nevertheless, the approvals establish an important and sufficiently developed infrastructure framework that informs the design and delivery of the Project and where consented, form part of the existing environment. The Project must connect with, complement and avoid compromising this framework to ensure the coordinated development of TPLM.

The principal matters requiring integration are:

- the east–west collector road, Road C1, identified in the Structure Plan as Collector Type A;
- the active-travel route identified by the Structure Plan building restriction area;
- SH6 and its associated intersection, public-transport and active-travel upgrades;
- the consented water-supply network, including the Slope Hill reservoir; and
- the wastewater and other bulk infrastructure required to service the wider growth area.

The relevant consent history and each of these integration matters are addressed below.

4.9.3 Relevant Resource Consents

The adjoining Flint’s Park land at 429 Frankton–Ladies Mile Highway has been the subject of a series of resource consents that progressively provide for its subdivision, servicing and comprehensive urban development. These approvals are not isolated proposals. Each successive application has relied upon or refined elements of the subdivision and strategic infrastructure authorised by the preceding approvals.

The first significant approval was RM230721. Although primarily providing for a bulk-title subdivision to facilitate future urban development, the consent also authorised substantial enabling and servicing works. These included earthworks for internal roads, the Slope Hill water reservoir and a wastewater pump station, together with the installation of bulk infrastructure required to service the anticipated development.

Subsequent approvals amended the subdivision layout, staging and detailed delivery of that development without displacing the underlying strategic servicing framework. More recent applications have progressed from bulk subdivision and enabling infrastructure to comprehensive residential and mixed-use development. Collectively, the approvals establish the points at which the Project must connect with adjoining roads, active-travel routes and three-waters infrastructure.

The principal approvals for the neighbouring site at 429 Frankton-Ladies Mile Highway are summarised in the following **Table 3**.

TABLE 3: PRINCIPLE APPROVALS AT 429 FRANKTON-LADIES MILE HIGHWAY

Consent	Description	Outcome
RM230721	10 lot bulk title subdivision to facilitate future urban development, construction of principle infrastructure including the Slope Hill water reservoir, wastewater pump station, bulk servicing infrastructure	Granted 27 February 2024
RM240476	Section 127 amendments to subdivision layout, staging and infrastructure delivery	Granted 21 August 2024
RM241049	Flint’s Park comprehensive land use and subdivision	Granted (EPA/Fast Track)

RM251107	Further amendments to subdivision layout and bulk lots	Granted June 2026
RM260587	Integrated Land use and Subdivision for 443 Dwellings, commercial and Community Facilities	Awaiting Further Information.
RM260477	Subdivision to create 71 units and 53 residential units	Awaiting Further Information

The relevance of these approvals extends beyond the development authorised within the adjoining land. They establish or refine infrastructure that is intended to form part of the wider TPLM network. The particular relationship between that infrastructure and the Project is addressed in the following subsections.

4.9.4 East–West Collector Road (Road C1)

Road C1 is the principal east–west collector road identified in the TPLM Structure Plan as a Collector Road Type A. It is intended to provide a continuous movement corridor through the northern part of the growth area, connecting Lower Shotover Road with the adjoining Flint’s Park development and providing an alternative east–west route to SH6.

The eastern portion of Road C1 has been authorised through the Flint’s Park consent framework. While its detailed design, width, treatment and staging have been refined through successive approvals, its strategic function as part of the wider TPLM transport network has remained consistent.

The Project provides the western continuation of Road C1 through the residential development, extending from Lower Shotover Road to the boundary with Flint’s Park. Road C1 will form the principal movement spine through the Project and will accommodate vehicle movements, walking and cycling connections, street trees, and the associated underground services.

Integration with the consented section of Road C1 requires the respective road formations and infrastructure to connect at the common boundary. Relevant matters include:

- horizontal and vertical alignment;
- carriageway, footpath and shared-path widths;
- stormwater management and overland-flow paths;
- underground services and service corridors;
- finished ground levels;
- landscaping and street-tree treatment; and
- construction timing and temporary boundary treatments.

The Project has been designed to provide a direct connection with the adjoining road corridor and to maintain the continuous east–west function anticipated by the Structure Plan. Accordingly, the Project does not introduce an independent or competing east–west route. It completes the western section of a collector road that has already been established through the

Structure Plan and adjoining consent framework, supporting coordinated access, servicing and movement across the wider growth area.

4.9.5 Active-Travel Route and Building Restriction Area

The TPLM Structure Plan identifies a 10m-wide Building Restriction Area (BRA) extending across the relevant parts of the residential development area and adjoining land along the southern boundary. In addition to managing the location of buildings, this corridor provides an important opportunity to establish a continuous active-travel connection through the wider growth area.

The adjoining Flint's Park approvals recognise and provide for an integrated walking and cycling network, including internal footpaths, connections to Road C1 and SH6, and future connections with neighbouring land. The Project must therefore ensure that its active-travel network connects logically and safely with these approved and planned facilities.

The Project retains the Building Restriction Area free from buildings and incorporates the corridor into the wider pedestrian and cycling network. The route will connect with the adjoining development and provide access to Road C1, SH6, public-transport facilities, open spaces and the internal movement network within the Project.

Integration across the common boundary requires coordination of:

- the location and width of the shared path;
- path levels, gradients and surface treatment;
- connections with adjoining footpaths and cycle facilities;
- accessibility and passive-surveillance outcomes;
- lighting, landscaping and wayfinding;
- stormwater and overland-flow requirements; and
- the timing of construction and any interim boundary treatment.

Where adjoining sections of the route are delivered at different times, the Project will preserve the ability for the continuous connection to be completed. The Project therefore treats the Building Restriction Area as part of the wider movement framework rather than simply as an area in which buildings are excluded. This approach maintains the continuity of the active-travel network and supports safe and convenient walking and cycling between the Project, Flint's Park and the wider TPLM area.

4.9.6 SH6 Works

SH6 forms the principal transport corridor along the southern boundary of the site and provides the primary connection between the eastern corridor, Frankton and the wider Wakatipu Basin. The scale of urban development anticipated within TPLM requires coordinated upgrades to the

State Highway corridor, including intersection, public-transport, pedestrian and cycling improvements.

The transport approvals associated with Flint's Park have progressed beyond providing a conventional access to an individual development. They include multimodal improvements intended to support the wider urbanisation of TPLM, including intersection upgrades, pedestrian-crossing facilities and active-travel connections along and across SH6.

The Project includes further works within and adjoining the State Highway corridor. These include upgrades at the SH6/Lower Shotover Road/Stalker Road intersection and associated walking, cycling and public-transport infrastructure. These works must integrate with the infrastructure already approved or planned for Flint's Park and the wider corridor.

The principal integration matters include:

- the design and operation of the State Highway intersections;
- pedestrian and cycle connections along and across SH6;
- connections with existing and planned public-transport facilities;
- traffic-signal design and coordination;
- the relationship between the State Highway works and Road C1; and
- the timing of infrastructure delivery relative to occupation.

The Project's transport design has been developed through consultation with NZTA and QLDC and informed by modelling of the wider TPLM transport network. This ensures that the assessment accounts for existing traffic, the Project and the development anticipated on adjoining land, rather than considering the Project as an isolated addition to the State Highway network.

The proposed State Highway works therefore form part of a coordinated corridor response to the planned urbanisation of TPLM. The Project will contribute to the progressive delivery of a safer and more integrated multimodal transport network capable of supporting development across the wider growth area.

4.9.7 Water Supply and Slope Hill Reservoir

The future urban development of TPLM requires substantial upgrades to the public water-supply network. A key component of that network is the proposed Slope Hill reservoir, which is authorised under RM230721 as part of the bulk servicing infrastructure for the adjoining Flint's Park development.

RM230721 authorises the earthworks and infrastructure necessary to establish the reservoir and associated bulk water-supply works. The reservoir has been retained through the subsequent section 127 amendments and continues to form part of the consented strategic servicing framework for the wider eastern corridor. We understand that the Consent Holder

intends to deliver this reservoir in accordance with its resource consent, noting this forms part of the existing environment.

The reservoir is intended to provide storage, network pressure and firefighting capacity for urban development within TPLM. Its function therefore extends beyond servicing an individual subdivision and is directly relevant to the water-supply strategy for the Project.

The Project includes the bulk watermain and associated infrastructure required to connect the residential development area with the Slope Hill reservoir and the wider QLDC water-supply network. Integration will require coordination of:

- reservoir capacity and the allocation of capacity between developments;
- the location, sizing and alignment of the bulk watermain;
- connection points and interface specifications;
- network pressure and firefighting requirements;
- pump, valve, metering and control infrastructure;
- easements and access for operation and maintenance;
- commissioning and vesting requirements; and
- the timing of the reservoir and bulk-main construction relative to occupation.

The detailed design and delivery of this infrastructure will be coordinated with QLDC and the adjoining developer to ensure that the reservoir, bulk main and internal reticulation operate as an integrated public water-supply system.

The Project does not propose a separate water-supply solution that duplicates the consented infrastructure. Instead, it relies upon and contributes to the coordinated water-supply framework being established for the wider eastern corridor. Occupation will be staged to ensure that the water-supply infrastructure necessary to service each stage, including adequate potable and firefighting supply, is operational. The proposed workers accommodation will be established prior to the infrastructure being constructed and operational, with either a connection to existing services or a truck in and truck out infrastructure solution proposed.

4.9.8 Wastewater and Bulk Services

The urban development of TPLM requires a coordinated wastewater network capable of servicing development across the wider growth area and conveying flows to the Shotover Wastewater Treatment Plant.

RM230721 authorises earthworks for a wastewater pump station and associated bulk servicing infrastructure within the adjoining Flint's Park development. Subsequent approvals have retained and refined the servicing framework for that development. These consented works form part of the wider infrastructure context within which the Project's wastewater solution has been developed.

The Project will establish an internal gravity-reticulation network serving the proposed residential, commercial and community activities. This infrastructure will comprise a combination of private infrastructure and public infrastructure to be vested in QLDC.

Integration between the Project, adjoining development and the wider public network requires coordination of:

- the location and capacity of connection points;
- the relationship between the proposed gravity network, pump-station infrastructure and trunk mains;
- pipe alignments, levels and crossing arrangements;
- easements and access for operation and maintenance;
- vesting and asset-acceptance requirements;
- commissioning and operational responsibilities; and
- the sequencing of infrastructure delivery relative to development and occupation.

The proposed wastewater infrastructure has been developed in consultation with QLDC Property and Infrastructure. A development agreement or equivalent delivery arrangement may be required to address funding, construction, vesting and any development-contribution implications associated with the Applicant delivering public trunk infrastructure.

Other bulk services, including electricity and telecommunications, will be installed within coordinated service corridors and connected to the relevant existing or planned networks. Their detailed design will be coordinated with the road, water, wastewater and active-travel infrastructure to avoid conflicts and enable future connections to adjoining development where required.

The Project's wastewater and bulk-servicing strategy therefore forms part of the coordinated infrastructure response required to enable the urbanisation of TPLM. The necessary wastewater infrastructure will be completed and commissioned before permanent occupation of the development it is required to service.

4.9.9 Other Consents Relating to the Site

The Applicant is separately progressing district resource consent RM260566 and regional resource consent RM26.282 for earthworks within the residential development area, comprising Lot 3 DP 606744, Section 9 SO 485598 and Lot 2 DP 617529. RM260566 also seeks the cancellation or variation of existing consent notices affecting the Site, which cannot be addressed through this Substantive Application.

A copy of the district and regional resource consent application is included as **Appendix W**.

Those resource consents are separate from the approvals sought through this Substantive Application. The earthworks included in this application are limited to works outside the

residential development area associated with the construction or upgrading of transport, water-supply, wastewater, stormwater and other infrastructure required to service the Project.

Consent RM260467 has also been recently obtained to amalgamate Section 9 SO 485598 with Lot 3 DP 606744. A copy of the decision RM260467 consent is included in **Appendix S**. The amalgamation is currently in progress, however at the date this Application was lodged the RoT has not yet been updated.

These approvals form part of the wider implementation framework for the Project but do not duplicate the activities for which approval is sought through this application.

4.9.10 Infrastructure Integration Summary

The consent history demonstrates that TPLM is being developed through a series of interrelated projects rather than isolated subdivisions. The Project forms part of that wider urban-development programme and has been designed to connect with and contribute to the strategic infrastructure already consented or planned for adjoining land.

The principal integration requirements relate to the continuation of Road C1, the active-travel network, the coordinated upgrading of SH6, connection to the Slope Hill reservoir and bulk water-supply network, and delivery of the wastewater infrastructure required to service the wider growth area.

Detailed design and construction will require continued coordination between the Applicant, QLDC, NZTA, adjoining developers and relevant infrastructure providers. This coordination will ensure that:

- infrastructure connects physically and operationally across property boundaries;
- sufficient network capacity is available for each stage;
- the Project does not prevent or compromise the delivery of adjoining infrastructure;
- construction sequencing accommodates works undertaken by different parties; and
- the infrastructure required to service each stage is operational before permanent occupation of the units, with the exception of the workers accommodation.

Accordingly, the Project is consistent with and contributes to the coordinated infrastructure framework being established for TPLM.

5 PROJECT DESCRIPTION

5.1 Overview

The Project seeks approvals under the FTAA for a comprehensively master-planned residential neighbourhood that will make a significant contribution to housing supply in the Queenstown Lakes District. The development has been purposefully designed as an integrated build-to-rent community and will be the first of its kind in Queenstown.

SLL aims to respond directly to Queenstown's acute housing challenges by increasing the supply of managed long-term rental accommodation in a market where rental options remain limited. This approach is intended to increase housing supply and improve housing choice and provide a stable, high-quality rental offering designed for long-term occupation. Subject to approvals being granted, SLL intends to deliver the apartments within an approximately four-year construction programme, enabling homes to be brought to market at pace.

The Project will deliver 1,085 new homes as part of an integrated residential neighbourhood supported by community facilities, transport infrastructure, open space, and a local shopping centre. Of the residential units, 45% will be 1-bedroom apartments, 48% 2-bedroom, and the remaining 7% will be 3-bedroom units. In addition to the residential component, the Project includes the coordinated delivery of subdivision, earthworks, roading, and three waters infrastructure, together with associated public and private open space. These elements have been planned as a single, comprehensive development to ensure the neighbourhood functions efficiently, provides a high standard of amenity for future residents, and contributes positively to the district's long-term urban growth and housing objectives.

The following sections describe the Project and provide a summary of its key elements in accordance with Schedule 5, clause 5(1)(a), and Schedule 6, clause 3(1)(a) of the FTAA.

5.2 Masterplan

The Masterplan provides the spatial framework for the comprehensive residential development. It illustrates the proposed built form, open space, transport and access network across the development area.

The Masterplan should be read alongside the supporting technical assessments and plans included with this application, which inform the design and layout of the Project.

The Project masterplan is illustrated in **Figure 10** below, and attached within the Architectural Drawings attached as **Appendix C**.



FIGURE 10: THE PROJECT MASTERPLAN. SOURCE: ARCHITECTURAL DRAWING SET PREPARED BY BREWER DAVIDSON. SEE APPENDIX C FOR FULL DRAWING SET.

5.2.1 Masterplan Approach

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

The masterplan is organised around two intersecting pedestrian spines, the existing liquidamber trees will be retained as far as practicable to maintain the defining landscape feature along the central north-south spine. Some trees will be relocated to form a triangular village green that acts as the central communal space. A residents' pavilion will anchor this green, which is visually connected to the lawn in front of the retained building on the northern side of Road C1, creating a linked sequence of open spaces.

5.3 Construction, Staging and Delivery

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

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

This approach is enabled through early infrastructure provision and a rolling construction methodology rather than traditional stop start staging. Initial works will focus on establishing key enabling infrastructure, including the primary collector road and associated services, to provide the framework for subsequent development. Once these core elements are in place, earthworks will be undertaken on a block-by-block basis to prepare individual development areas. Building construction will then commence progressively across the residential development area, with different blocks advancing at slightly different times to allow a rolling delivery program. This approach provides flexibility and supports efficient use of resources. For the avoidance of doubt, this is not intended to suggest that SLL is relinquishing the flexibility to stage or sequence different aspects of construction.

For completeness it is noted that SLL is also progressing RMA consents with the district and regional Councils for enabling works limited solely to earthworks across the residential development area under RM260566 and RM26.282. These consents are being sought so SLL can commence physical works as soon as practicable and make full use of the 2026/27 summer construction season. The enabling works will ensure the residential development area is prepared in time to begin building activity in 2027, maintaining programme certainty and avoiding seasonal delays. This will ensure the development can progress at pace, should consents for this Project be approved under the FTAA.

Construction Staging

The construction programme reflects timing for site establishment, fast-track approval, and building consent, and is structured to seek to achieve:

- Earthworks commencing October 2026 under separate earthworks consents RM260566 and RM26.282
- Construction starting in January 2027, subject to Fast-track approval
- The first five buildings underway within the first three months of Fast-track approval, subject to building consent
- External wastewater and water infrastructure works commencing Q3 2027
- Major SH6 intersection and local road upgrade works commencing Q4 2027 and completing by April 2028
- Sequential construction of subsequent buildings to maintain a consistent, steady-state level of labour and resourcing

Occupancy Sequencing

Occupation of the site and buildings will occur in two distinct stages, sequenced to ensure suitable infrastructure is operational.

- Stage 1 – temporary worker accommodation
- Stage 2 – permanent occupation

Stage 1 follows the completion of the first five buildings. SLL contractors will begin living on site, utilising these buildings as workers accommodation. This stage will be supported by temporary infrastructure (water, wastewater and service connections) sufficient to service construction personnel rather than the full permanent infrastructure network.

Dwellings will not be made available to rent to the public under Stage 2 until the major infrastructure upgrades have been completed. The collector road, external wastewater and water works and the SH6 intersection upgrade will have been delivered and be fully operational ahead of any permanent occupation.

5.4 Stage 1 - Temporary Worker Accommodation

SLL proposes to utilise approximately the first 100 completed units as temporary worker accommodation to support the staged delivery of the wider development. These units will be occupied by SLL employees, contractors, and construction personnel involved in the Project. This approach enables an early on-site workforce presence, reduces travel and accommodation pressures within Queenstown, and supports efficient construction sequencing.

Servicing for these initial units may not be connected to the reticulated QLDC network if capacity upgrades are not yet available at the time of occupation by temporary workers. In that circumstance, SLL will provide compliant temporary servicing solutions to ensure all wastewater, water supply, and stormwater requirements meet applicable codes, sanitary standards, and environmental management expectations. Temporary systems will be designed, installed, and monitored in accordance with best practice and decommissioned once permanent reticulated services are available.

This temporary worker accommodation is limited in scale, temporary, and integrated within the construction programme. It will not generate adverse effects beyond those anticipated for the construction phase and will facilitate the efficient and orderly completion of the remaining stages of the development.

5.5 Built Form

5.5.1 Residential

5.5.1.1 Apartment buildings

The Project proposes 1,085 residential units across 40 apartment buildings as part of the comprehensively planned neighbourhood. The residential built form comprises a combination of three-storey walk-up apartment buildings and larger five- to eight-storey apartment buildings, providing a variation in built form across the development. Of the 40 apartment buildings proposed, 33 are three storeys in height, with the remainder ranging from five to eight storeys. This mix of building heights supports a varied urban form while enabling a relatively high yield of housing. The built form is largely organised around the two intersecting central pedestrian spines, being north to south and east to west. The north to south spine is characterised by the existing liquidamber trees which will be retained as a defining feature that reinforces the development's identity, whilst framing spectacular mountain views to the north and south.

The development provides a wide range of apartment sizes to support housing diversity and choice within the Queenstown rental market. The apartment typologies have been designed as modular components, enabling units to be combined in multiple configurations to form different building layouts across the development. This modular approach supports design efficiency, consistency in construction quality, and flexibility in how buildings are arranged, allowing the development to respond to both market needs and the spatial structure of the TPLM Zone.

Apartment building heights range from 9.5m to 27.4m, with the taller buildings generally positioned along the central pedestrian spines and towards the rear of the development, while lower buildings are positioned closer to the highway boundaries. This arrangement helps to manage the interface with adjoining land, reduces the potential dominance at the perimeter, and concentrates greater density within the heart of the development where it can best be supported by open space, pedestrian connections, and community facilities. The placement of taller buildings along the central green spines also enables residents to benefit from outlook, sunlight, and convenient access to high quality communal areas, while the overall height transition assists in integrating the development into its surrounding context.

Built Form

The built form is generated through the assembly of three standardised apartment typologies, one-bedroom, two-bedroom, and three-bedroom units, each with slight layout variations depending on whether they are used within walk-up buildings or apartment buildings. The modular design enables each building to incorporate a different mix and arrangement of unit types, resulting in variation in frontage lengths, balcony placement, and building orientation. Although overall building heights remain consistent, the way units are combined produces three-dimensional modulation across façades, including changes in balcony expression, recesses, projections, and outlook. This approach avoids repetitive built form, creates visual interest, and enables each block to respond appropriately to its immediate context within the development. Minor variations in unit size occur depending on whether balconies are recessed or projecting, further contributing to architectural diversity while maintaining a coherent design language. The modular design of each unit typology is shown in **Figure 11** through **Figure 13** below.



FIGURE 11: ONE BEDROOM APARTMENT TYPOLOGIES



FIGURE 12: TWO BEDROOM APARTMENT EXAMPLES



FIGURE 13: THREE BEDROOM APARTMENT EXAMPLES

Building typologies

The masterplan shown in **Figure 10** identifies how apartment buildings are distributed across the residential development. The three apartment typologies are combined in modular configurations aligned around each building's circulation core. At the building scale, the placement of stairs and lifts establishes the primary framework, with modular units arranged horizontally and vertically to form the building footprint and height. Variations in how these modules are assembled create differences in massing, orientation, and façade expression between buildings, resulting in a visually diverse built form that responds to its immediate context.

Quadplex

A quadplex block is comprised solely of two-bedroom apartments organised around the stairwell stacked vertically to form a three storey apartment block with four residential units on each level and all accessed via a central stairwell. Refer to **Figure 14** below.

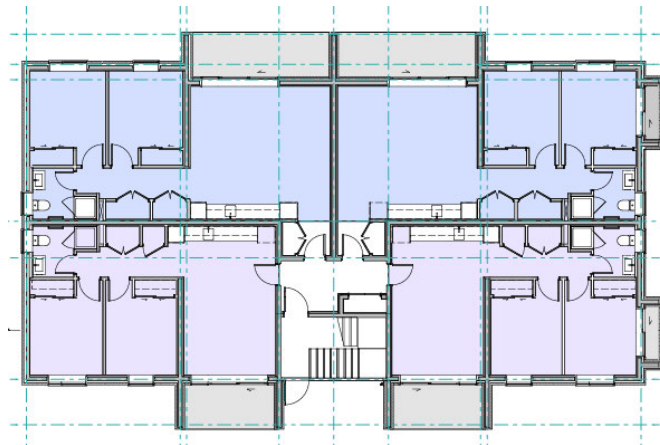


FIGURE 14: FOUR TWO-BEDROOM UNITS

As a more complex example, the below example portrays a building comprising all three unit typologies. Each unit is organised around a connecting stairwell, which are located on alternating elevations to provide external variation of the building. As shown below in **Figure 15**.

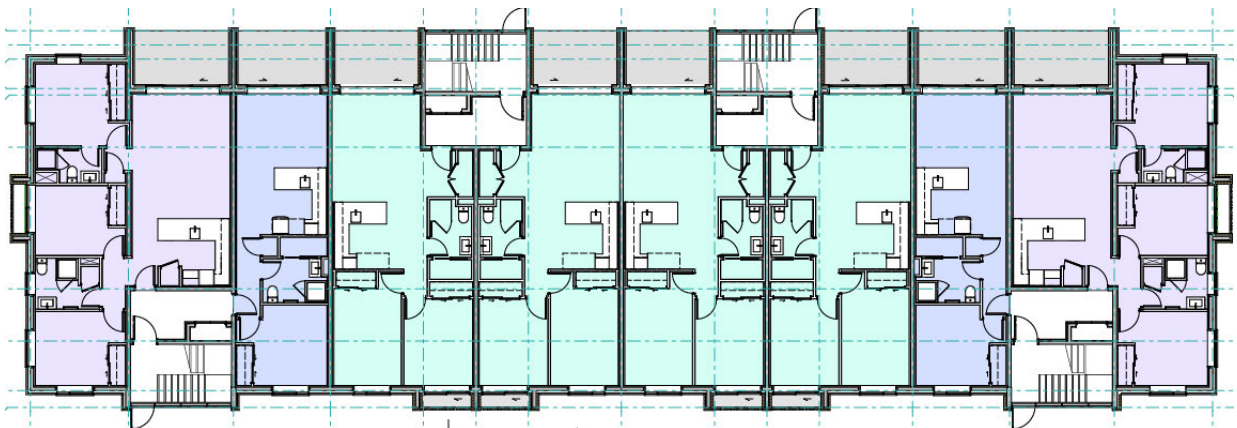


FIGURE 15: 8 UNIT FLOOR PLAN (SINGLE FLOOR IN AN APARTMENT BUILDING)

5.5.1.2 Car parking

Car parking for the development has been intentionally planned to support a high quality living environment while encouraging a shift towards alternative transport modes to align with the TPLM Zone policy intent. Parking infrastructure within the development will be consolidated largely within two centrally located, four-level parking buildings. The parking buildings separate vehicles from the residential apartment blocks with the aim of minimising visual and functional dominance of cars within the residential environment. The two integrated parking garages reduce the need for extensive surface parking, enabling a more generous landscaped environment, space for recreation and supporting pedestrian and cycling priority.

Each parking building can accommodate up to 300 resident car parks inclusive of 3 visitor/EV charger spaces and will be designed with articulated façades and high-quality external materials to integrate appropriately with the surrounding built form. Extensive street level landscaping,

including tree planting, will be implemented around the perimeter of the buildings. In addition, the development provides 505 residential on-street car parks for residents and 1,085 bicycle parks in covered bike sheds across the development.

The collector Road C1 will contain on-street car parks spaces for the public, and a further 22 visitor car parks and 12 mobility car parks are provided across the development.

5.5.1.3 Community Buildings and Spaces

Each internal open space area will be supported by community infrastructure designed to serve the day-to-day needs of residents and strengthen the social function of the open space network. These facilities include a combination of pergola and BBQ areas, as well as multi-functional community buildings. In addition to the park pavilions, building 30 incorporates a shared community space on the upper floor for communal use. These vary in size and functionality, with C1 being the primary and largest communal building (shown in **Figure 16**Figure 16) and C2-C4 being smaller buildings (shown in **Figure 17**). These facilities have been deliberately distributed throughout the development so that residents have convenient access to shared amenities within a short walking distance of their homes. Their location within the internal pedestrian and open space network ensures they are highly accessible, visible, and well-integrated with the wider movement framework of the development.

The multi-functional communal buildings provide flexible indoor spaces that can accommodate a range of shared activities and resident needs. These buildings are expected to include meeting rooms, work-from-home and study areas, informal lounge spaces, and associated kitchen and bathroom facilities. The design supports a mix of uses, ranging from of day-to-day remote working and study spaces, to areas that provide for hobby groups and small social gatherings. The buildings will complement the private living spaces within individual apartments by providing additional shared spaces that support different household types. Where connected to outdoor areas, these facilities will also help activate adjacent parks and courtyards, supporting a strong relationship between indoor community facilities and the wider landscaped environment.

The pergola and BBQ areas provide smaller-scale shared facilities within the open space network. These have been positioned in easily accessible location and designed to serve as community hubs to support passive recreation, incorporating seating, communal tables, and landscaped gathering areas that encourage informal interaction. They are intended to support passive recreation and informal social use. These facilities will contribute to the overall amenity of the development and help foster a sense of belonging among residents.



FIGURE 16. C1 PAVILLION FLOOR PLAN AND ELEVATIONS. SOURCE: ARCHITECTURAL DRAWINGS, SHEET SK87 (APPENDIX C)

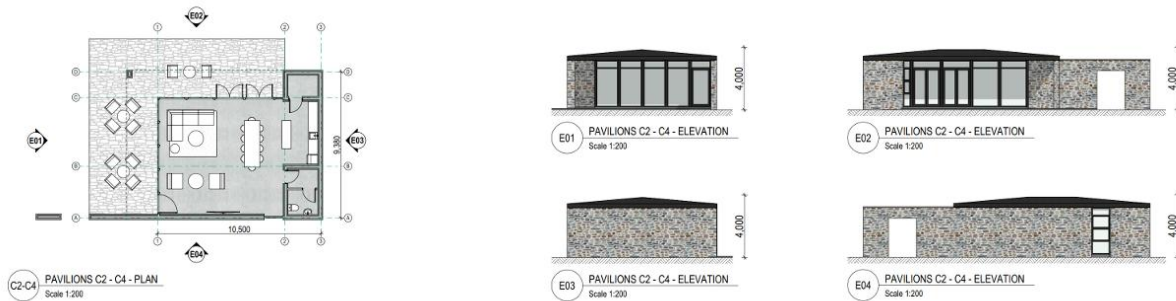


FIGURE 17. C2-C4 PAVILLION FLOOR PLAN AND ELEVATIONS. SOURCE: ARCHITECTURAL DRAWINGS, SHEET SK87 (APPENDIX C)

5.6 Commercial

The commercial component of the Project is provided for within a commercial development lot (Lot 5) which will function as a Local Shopping Centre, located at the corner of Lower Shotover Road and Road C1. This location has been selected to provide a visible and accessible local-scale retail node at a prominent gateway to the development, while also responding to the revised movement network and the need for convenient access, kerbside parking, and strong pedestrian and cycling connections.

The retail offering is intended to operate at a neighbourhood scale, supporting the day-to-day needs of residents and the surrounding community rather than functioning as a destination centre. Its position on the Lower Shotover Road corner will help activate the street edge and provide a clear interface between the residential neighbourhood, Road C1, and the wider TPLM movement network. The commercial lot will enable a range of local commercial and retail activities that complement the residential development and support a walkable, mixed-use neighbourhood.

Consent is sought for the commercial activity on this lot, however no buildings are proposed as part of this application. Instead, SLL will service the commercial development lot with all applicable infrastructure for it to be developed at a later date. A consent notice will manage the

future built form standards for this lot as well as the scale of commercial activity to align with the QLDC PDP Local Shopping Centre Zone standards.

In addition, the Project retains the existing residential unit on the northern side of Road C1 for adaptive reuse as a leasing office and café. The café will provide a local food and beverage offering for residents and visitors, while the leasing office will support the ongoing operation and management of the development. Together with the commercial development lot, these activities will contribute to the activation of the central open space network and support the establishment of a vibrant and self-sufficient neighbourhood.

5.7 Open Space

The core design ethos for the development has been shaped by the evolving urban form of the TPLM corridor, balancing residential intensification with amenity and functional open space. Increasing building height enables a larger quantity of green space and the design responds to this balance through a strong emphasis on landscape integration, ensuring that open space is embedded throughout the development and contributes to a distinct and cohesive sense of place. Refer to **Figure 18** below which illustrates.

The TPLM Structure Plan proposes an open space area (Local Park) at the corner of the collector road, although the legend asterisk indicates that there is flexibility in the final location. SLL propose to /local park on the northern side of Road C1 as part of the Project, provided it is eligible for development contribution credits. The park will be approximately 4,000m² containing both flat active open space and a bush covered slope as a backdrop. The open space will be developed in consultation with QLDC. The remaining open space provision in the development will be retained by SLL in private ownership.



FIGURE 18: RECREATION AND PLAY SPACES. SOURCE: LANDSCAPE DRAWINGS, DRAWING 2570/04 OPEN SPACE - 01 (APPENDIX G)

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

A legible and interconnected network of footpaths and cycle paths will be established throughout the development, connecting to the active travel route adjacent to the SH6 and the neighbouring developments to the east and north. An easement in gross in favour of QLDC is proposed over the green corridor to connect the SH6 active travel route to collector Road C1. An additional easement in gross is proposed vertically along the eastern boundary of the development, providing another north south connection and the ability to connect into the neighbouring site to the east; and horizontally connecting this pathway to the green corridor. Refer to **Figure 19** below for the proposed easement plan.



FIGURE 19. PROPOSED EASEMENT PLAN. SOURCE: ARCHITECTURAL DRAWINGS, SHEET SK82 (APPENDIX C)

Distributed throughout the development, a series of pocket parks and shared open spaces are integrated between apartment buildings (**Figure 20**). These smaller-scale green spaces provide accessible and convenient amenity for residents within close proximity to their homes. Pocket parks are designed to support passive recreation, incorporating seating, communal tables, barbeque facilities and landscaped gathering areas that encourage informal interaction.



FIGURE 20. GREEN SPACES AND POCKET PARKS LOCATED THROUGHOUT THE DEVELOPMENT

5.8 Access and Transportation

The access and transportation strategy for the Project has been developed to support a compact, well-connected residential neighbourhood that integrates with the wider TPLM movement network. The design is intended to provide safe and efficient access to the development, with a strong emphasis on encouraging walking, cycling and public transport use as practical everyday travel options for future residents.

Vehicle access to the development will be provided solely from the new collector Road C1. Road C1 will connect to Lower Shotover Road in general accordance with the movement network anticipated by the TPLM Structure Plan. This intersection will be constructed as a 3-arm signalised intersection and will form the primary public road connection through the TPLM development.

The internal movement network has been designed to support a compact, walkable neighbourhood that reduces reliance on private vehicle travel. Internal private roads will connect to Road C1 in three locations and provide access to the residential buildings, parking buildings, community facilities, and the local shopping centre. Car parking will be largely consolidated within two centrally located parking buildings, reducing the dominance of vehicle parking within the residential environment and allowing the development to prioritise pedestrian movement, cycling connections and landscaped open space.

A comprehensive pedestrian and cycling network is proposed throughout the development. This includes the shared paths along Road C1, and a landscaped central north-south pedestrian / cycle spine that connects C1 to SH6 through the development. The central corridor will provide a high-quality active transport route that is separated from general vehicle traffic and integrated with the development's open space network. This route will connect with the active travel corridor along SH6 and with adjoining land to the east and north, supporting wider permeability across the TPLM area. An easement in gross in favour of QLDC is proposed over the central corridor to secure public pedestrian and cycle access between the SH6 active travel route and Road C1. Additional pedestrian and cycle connections are also proposed along the eastern boundary of the residential development area, enabling future links to neighbouring development areas.

5.8.1 Transport – external (to be vested)

To support the Project and development within TPLM, upgrades are required to the surrounding road network to provide safe and efficient transport connections for the additional residents, visitors and service vehicles generated by the development. These external transport works form part of the package of infrastructure required to support the Project and will be constructed and vested in QLDC (if not already). With the exception of the 100 temporary worker accommodation units, the residential apartments will not be rented out or occupied until all required infrastructure has been constructed.

5.8.1.1 Collector Road C1

The Project includes construction of part of the new collector Road C1 (identified as Collector Type A within the TPLM Structure Plan). The road will provide an important east-west

connection between Lower Shotover Road and future development areas located to the east of the site. Upon completion, C1 will be vested in QLDC as public road.

Road C1 will:

- Incorporate an 8.4m wide two-way carriageway
- On-street parallel parking
- A 2m wide footpath adjacent the northern side of the road and a 3m wide shared cycle path along the southern side
- Street trees between the on street parking and a planted buffer which separates the road from pedestrian and cycle paths

The proposed cross-section of Road C1 is shown in **Figure 21** below.

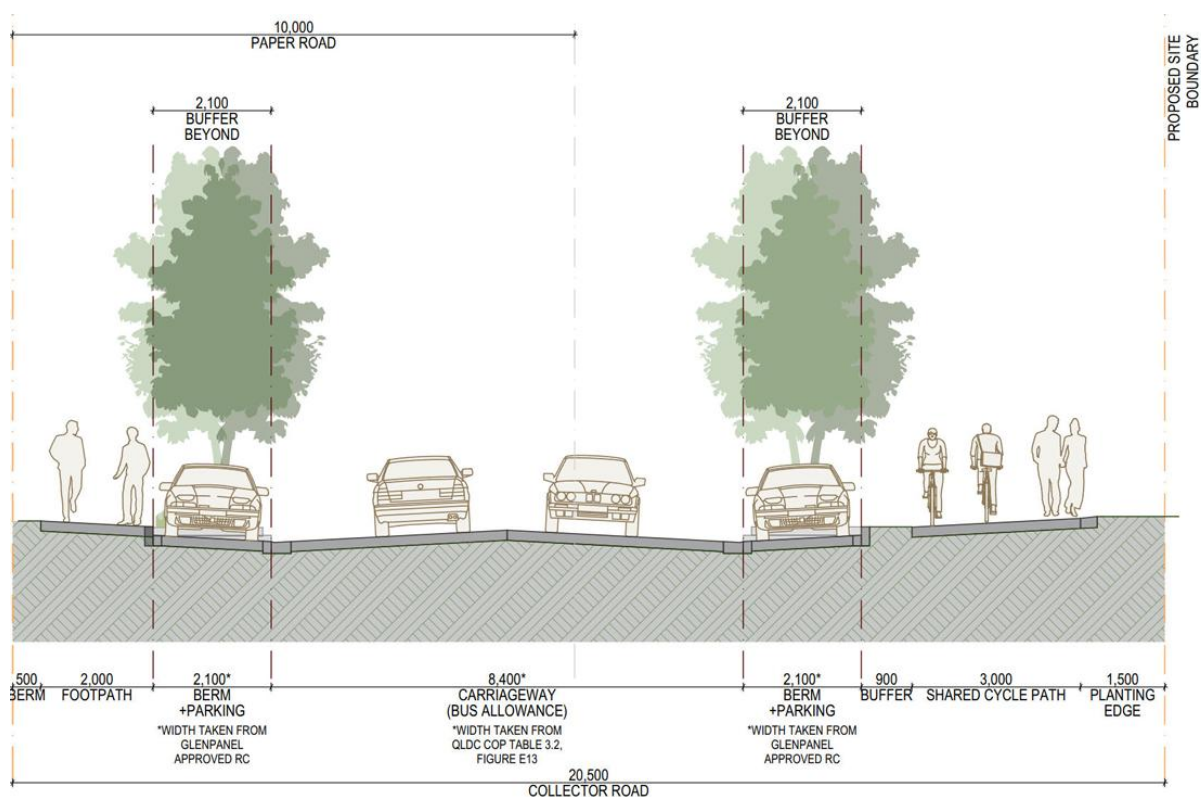


FIGURE 21. PROPOSED COLLECTOR ROAD C1 CROSS SECTION. SOURCE: ARCHITECTURAL DRAWINGS, SHEET SK56 (APPENDIX C)

5.8.1.2 SH6 / Lower Shotover Road / Stalker Road Intersection Upgrades

The existing roundabout at the intersection between SH6, Stalker Road and Lower Shotover Road is proposed to be upgraded to a signalised intersection, as well as infrastructure upgrades on the approaching roads. See **Figure 22** below. The upgrades include:

- Traffic signals controlling all approaches
- Signalised pedestrian and cycle crossings across SH6 and Lower Shotover Road
- Modifications to the Stalker Road and Lower Shotover Road approaches

- Bus stop infrastructure on SH6 adjacent to the intersection
- Inclusion of a bus lane on the SH6 west bound lane east of the proposed signalised intersection
- SH6 westbound bus lane added between Stalker Road and the Shotover River Bridge

The plans provide detail as to the turning lanes, medians, pedestrian crossing facilities and geometric upgrades associated with the signalised layout.

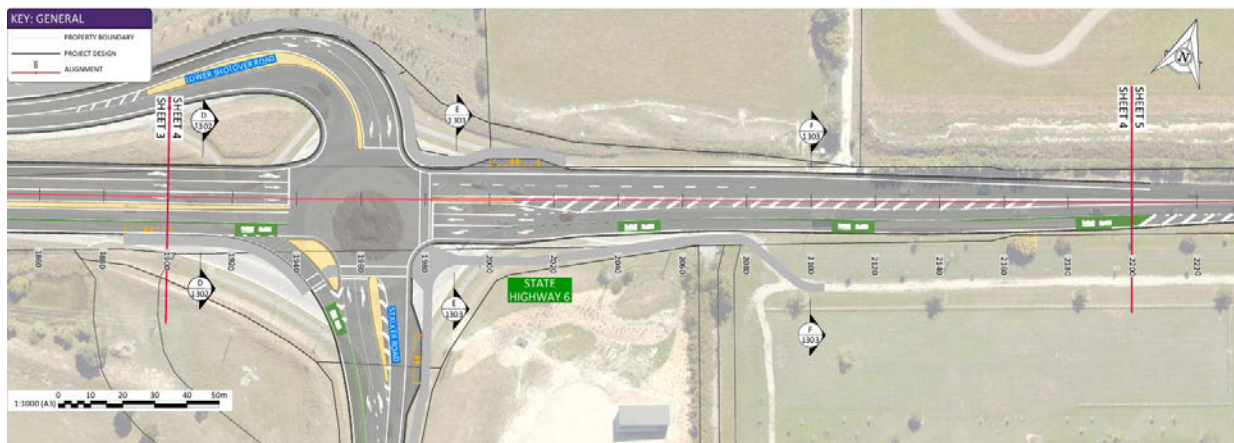


FIGURE 22. PROPOSED SH6 / LOWER SHOTOVER ROAD / STALKER ROAD INTERSECTION LAYOUT. SOURCE: BBO GENERAL ARRANGEMENT & LONGSECTION RS000 SHEET 4 (APPENDIX K)

5.8.1.3 Development Access - Lower Shotover Road / Road C1 Intersection

A new signalised intersection is proposed at the intersection of Road C1 and Lower Shotover Road to provide the primary vehicle access to the development. The intersection has been designed to safely accommodate the forecast traffic demands generated by the development.

The intersection will be controlled by traffic signals and will comprise a two-lane approach on each intersection leg, providing separate through and turning lanes for approaching traffic. Single-lane departures are proposed on each leg of the intersection. Pedestrian signal crossings are proposed across both the Collector road and Lower Shotover Road to provide safe and convenient crossing opportunities and to support an integrated active transport network. A shared path is proposed adjacent to the collector road and will continue through the intersection before connecting with the shared path along Lowes Road. Refer to **Figure 23** below for the proposed intersection layout.

The intersection includes:

- Traffic signalling lights
- Traffic signals
- Vehicle access into the development
- Pedestrian and cycle crossing facilities on Lower Shotover Road
- Integration with the collector road network



FIGURE 23. PROPOSED SPENCE ROAD / LOWER SHOTOVER ROAD LAYOUT. SOURCE: BBO GENERAL ARRANGEMENT & LONGSECTION RS200 & RS300 (APPENDIX K)

5.8.1.4 Spence Road / Lower Shotover Road Intersection Upgrade

The existing intersection where Spence Road meets Lower Shotover Road is proposed to be upgraded to a priority controlled T intersection to improve traffic flow and safety. Refer to **Figure 24** below for the proposed intersection layout.

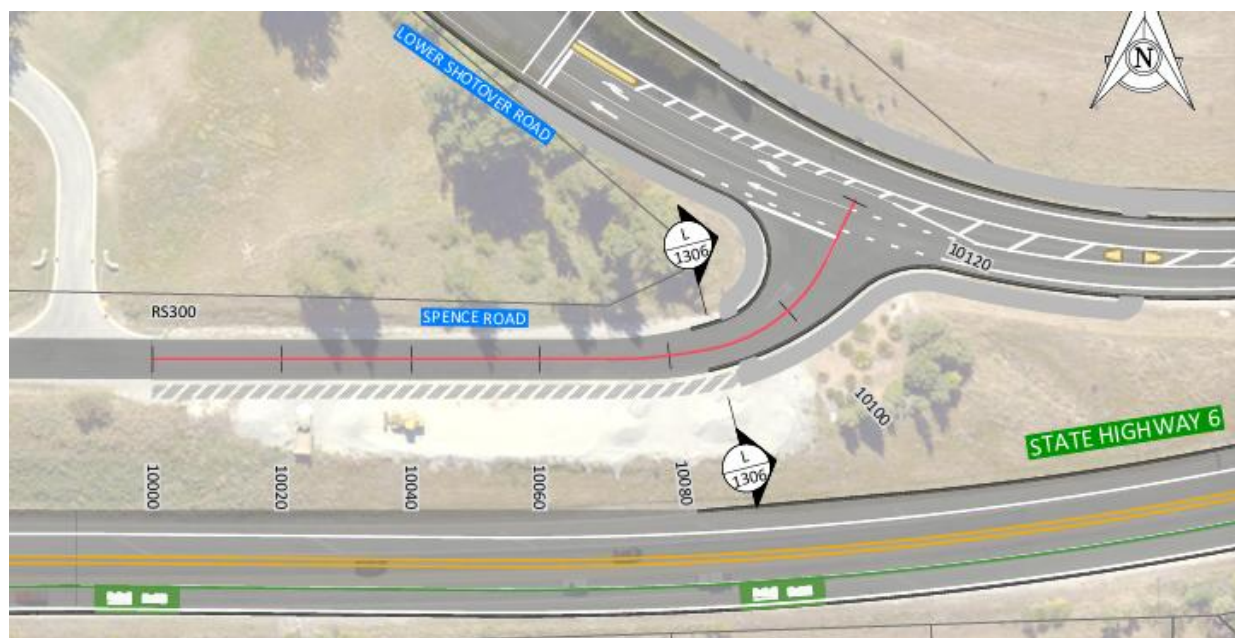


FIGURE 24. PROPOSED SPENCE ROAD / LOWER SHOTOVER ROAD LAYOUT. SOURCE: BBO GENERAL ARRANGEMENT & LONGSECTION RS200 & RS300 (APPENDIX K)

5.8.2 Transport - Internal (not vested)

Within the development, the internal private roading network has been designed to provide hierarchical access and functionality, consistent with urban design and traffic engineering standards. These internal roads have been designed without throughfare and will remain in private ownership of SLL. The internal road layout is shown in **Figure 25** below.

The internal road structure comprises six main roads with three crossings from collector Road C1. The layout has been designed around the building blocks and open space to create a connected and permeable network.

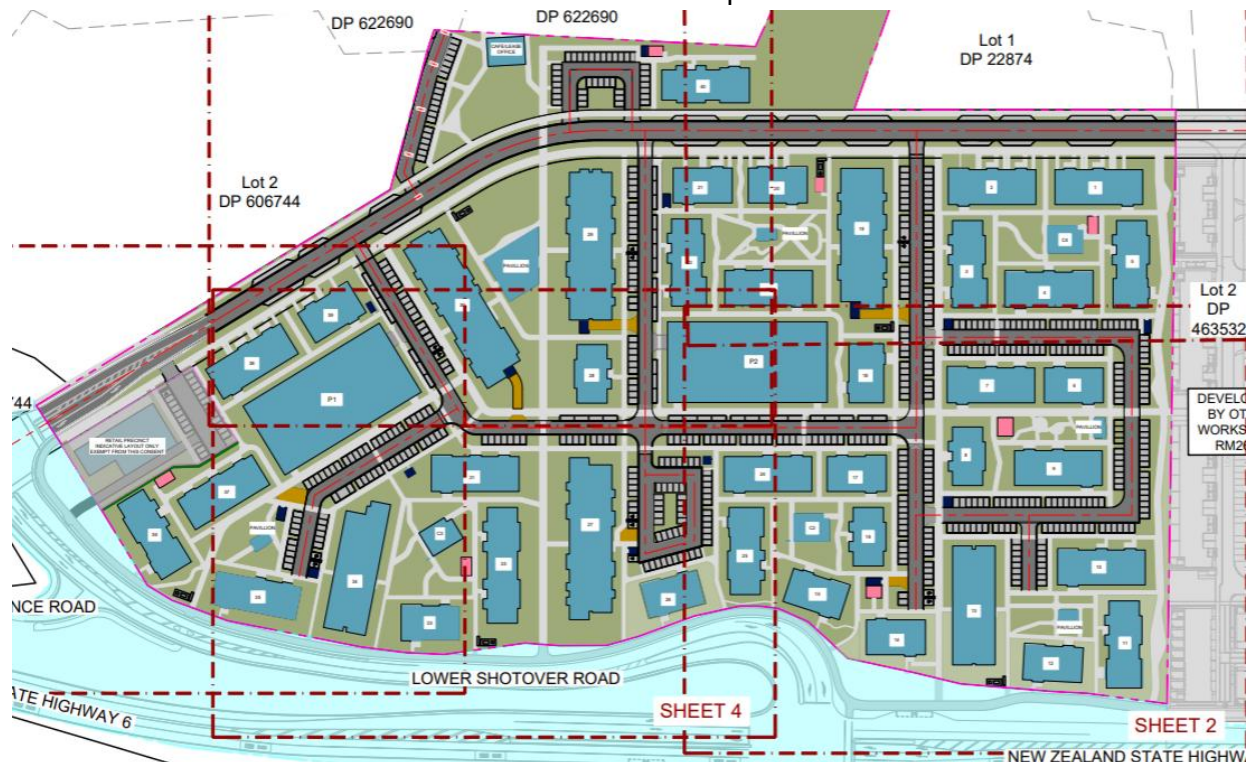


FIGURE 25. PROPOSED INTERNAL ROADING LAYOUT. SOURCE: CIVIL ENGINEERING INFRASTRUCTURE PLANS, DRAWING 4163-300, ATTACHED WITHIN APPENDIX L

The internal road structure comprises six main roads with three crossings from collector Road C1. The layout has been designed around the building blocks and open space to create a connected and permeable network.

The roads are formed as 6m wide, two-way carriageways, incorporating on-street parking as either parallel or perpendicular parking. All road corridors include street trees intermittently between the parking bays.

Footpaths and shared paths are provided adjacent the road corridor, separated by street parking and berm planting, as well as additional paths throughout the development. Together, the internal roads, landscaping, and active travel infrastructure have been designed to create a connected, attractive, and people-focused neighbourhood that prioritises accessibility and ease of movement for all users. An example of the internal roading cross section is provided as **Figure 26**.

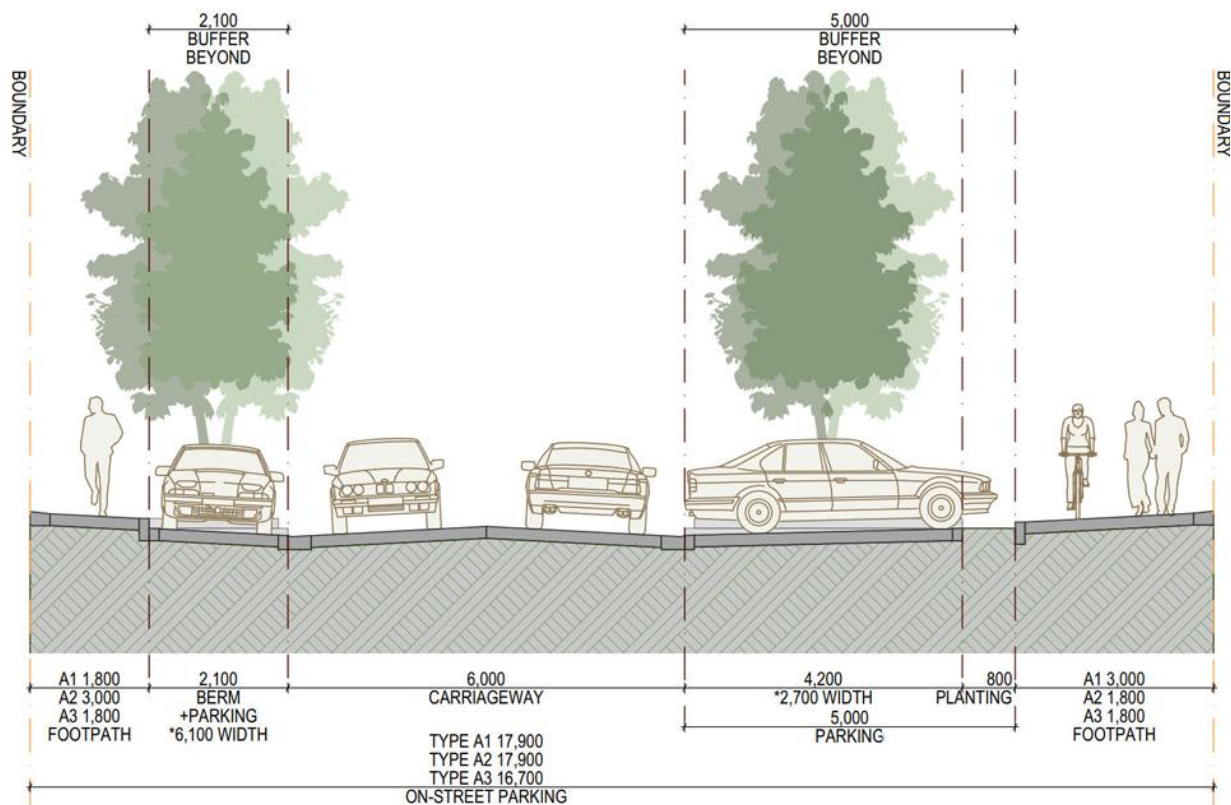


FIGURE 26. PROPOSED INTERNAL ROADWAY CROSS SECTION. SOURCE: ARCHITECTURAL DRAWINGS, SHEET SK57 (APPENDIX C)

5.9 Servicing

The proposed servicing approach has been designed to support the comprehensive development of the Project, and ensure that it is appropriately integrated with the wider TPLM infrastructure network. Reticulated services capable of servicing the proposed development are not yet available. The Applicant proposes to upgrade existing reticulated services to provide for the demand capacity of the proposed development as well as increase capacity to support increased urban growth in the area.

The proposed wastewater, stormwater and water supply services are set out in the External Infrastructure Report prepared by BBO and the Civil Engineering Infrastructure Report prepared by McKenzie & Co (**Appendix K** and **Appendix L**).

5.9.1 Stormwater

The stormwater strategy included in the Civil Engineering Infrastructure Report has been prepared by McKenzie & Co, who have provided a strategy specifically designed to be in accordance with the Guiding Principles for stormwater management outlined in Section 27.9.8.1.d of the TPLM Plan Variation provisions and with the QLDC Land Development and Subdivision Code of Practice (2025).

Stormwater within the residential development area will be collected via a piped stormwater network and directed to water quality treatment and soakage devices. The devices will provide storage, and quality treatment to a QLDC Land Development and Subdivision Code of Practice standard. The proposed devices utilise in-ground tanks capable of providing detention,

retention, and soakage discharge to ground for storm events up to the 1% AEP event, with climate change allowances incorporated into the design. The proposed network within the residential development area is to remain private.

In accordance with 27.9.8.1(d)(iv) of the Guiding Principles for stormwater management, stormwater runoff from Slope Hill is required to be intercepted, treated, and discharged to ground for the 1% AEP storm event. A separate but integrated stormwater management approach is proposed for runoff originating from the upstream Slope Hill catchment. Runoff from this catchment will be intercepted by diversion bunds located along contour lines, with runoff collected via scruffy dome manholes. The integrated stormwater treatment system incorporates inlet treatment via scruffy dome riprap structures, primary sediment capture through silt traps, and secondary treatment via proprietary devices (Hynds Downstream Defenders or similarly approved). Flows will then be diverted to a modular soakage system for discharge to ground.

For infrastructure works surrounding the residential development area, BBO Ltd have prepared the stormwater management approach for the proposed road corridor works around Lower Shotover Road, Spence Road, SH6 and the Stalker Road interface, which is included in **Appendix K**. This includes new or upgraded road pavement, kerb and channel, catchpits, stormwater reticulation, treatment infrastructure, shared paths, berms and associated drainage works.

The stormwater system is required to manage runoff generated by these road corridor elements without creating adverse effects on adjoining land, downstream environments or the wider development area. The proposed roading infrastructure associated with the wider TPLM transport upgrades incorporates a stormwater system within the road corridor. Road runoff will be collected through kerb and channel systems, conveyed through stormwater reticulation and treated via sumped catchpits and gross pollutant traps before discharge to distributed soakage infrastructure located within the shared path and verge corridors. Two soakage configurations have been assessed including aggregate-filled soakage trenches and proprietary modular soakage systems, both of which have been demonstrated through hydraulic modelling to provide sufficient storage and infiltration capacity for the design storm event.

5.9.2 Wastewater

A reticulation network is proposed within the residential development area to provide wastewater connections for all dwellings and commercial areas. This network will be a combination of public and private infrastructure. All pipes will be constructed by SLL, with the public pipes to be vested in QLDC.

Wastewater generated by the development will be collected and conveyed through an internal gravity reticulation network that services all development areas before discharging to a proposed external wastewater siphon main. The external wastewater siphon will take flows from the development along SH6 and the Shotover Bridge where flows will be conveyed to the Shotover Wastewater Treatment Plant. SLL are proposing to deliver (consent and construct) all of the internal wastewater infrastructure.

External infrastructure

To enable servicing of the development, a new 450mm diameter public wastewater main is proposed between the eastern end of the Shotover Bridge and the residential development area. This is identified as Stage 1 in **Figure 27** below, and forms part of the wider TPLM wastewater servicing strategy. Stage 1 is identified as the infrastructure required prior to connection of the first dwelling within the development. The proposed development will connect to this upgraded network, which has been assessed as having sufficient capacity to accommodate the 1,085 residential units proposed as part of the Project.

The wider wastewater servicing strategy for the TPLM growth area identifies additional future upgrades, including a second 450mm diameter wastewater main extending from the western side of the Shotover Bridge to the Shotover Wastewater Treatment Plant. This is identified as Stage 2 in **Figure 27**. SLL is seeking consent for Stage 2 as part of this application on a conservative basis in case something changes in the future and it is also required to service the Project. At this point in time, SLL does not propose to construct or deliver Stage 2 if it is not required to support servicing of the Project.

Engagement with the QLDC Property and Infrastructure team, who undertake the approval of the public works external to the residential development area has been undertaken concurrently throughout the preliminary design stages.

The proposed wastewater solution aligns with the QLDC long-term plan. SLL is intending to enter into a development agreement with QLDC in relation to the external infrastructure it is proposing to deliver.

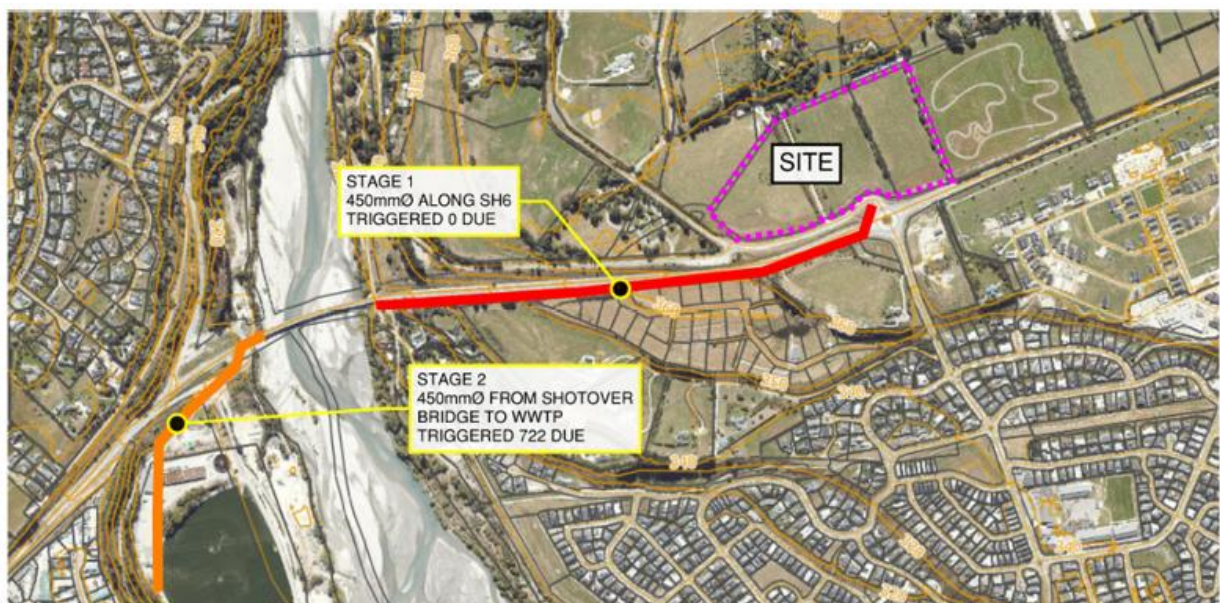


FIGURE 27: PROPOSED EXTERNAL WASTEWATER INFRASTRUCTURE. SOURCE: CIVIL ENGINEERING INFRASTRUCTURE REPORT (APPENDIX L)

5.9.3 Water Supply

A proposed ring main around the residential development area will feed the internal water reticulation. The ring main is proposed to be 450mm diameter along the eastern boundary of the residential development area and 280mm diameter along all other boundaries. A connection point for the new ring main will be provided by a falling main connection from the reservoir northeast of the residential development. The reservoir, associated water supply infrastructure

and falling main as discussed in Section 4.9 have already been authorised under a separate consent (RM230721) and are proposed to be delivered by another party (adjacent developer) as part of the wider urban development of the TPLM area. Connection points from this infrastructure will supply the development's internal reticulation network.

Firefighting design assumes full residential and commercial development, with hydrant spacing meeting QLDC requirements ($\leq 135\text{m}$ to dwellings and $\leq 270\text{m}$ between hydrants).

External infrastructure

Two stages of infrastructure are proposed under this application, illustrated in **Figure 28** below. Stage 1 will be a 560mm diameter watermain from the existing 450mm diameter watermain at the eastern end of the Shotover bridge to the eastern edge of the residential development area. The alignment is proposed to follow the southern edge of SH6, cross SH6 at the western edge of the residential development area, travel along the northern edge of the proposed collector Road C1, and terminate at the eastern edge of the residential development area. Stage 1 will be required to be commissioned prior to permanent occupation of the units. Detailed water modelling is currently underway by QLDC, and initial investigations have suggested a booster pump station may be required along the Stage 1 watermain. Results of the modelling will confirm this in the future.

Stage 2 will be a 560mm diameter watermain from the Shotover Country (SOC) Borefield to the existing 450mm diameter main at the eastern end of the Shotover Bridge (see **Figure 28** below). Starting from the SOC Borefield, the alignment is proposed to follow the Twin Rivers Trail before deviating into DOC land at the junction with Old School Road and finally terminating at SH6 on the eastern end of the Shotover Bridge. Detailed water modelling is currently underway by QLDC that should confirm the required Stage 2 trigger in the near future.

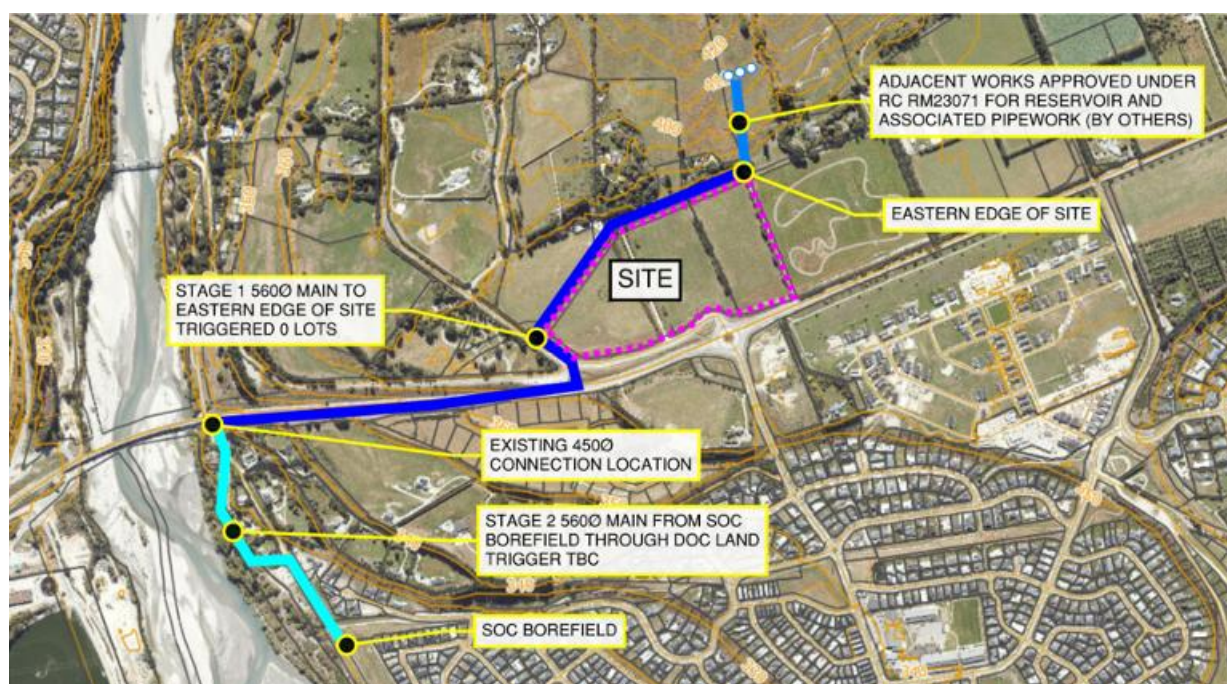


FIGURE 28: PROPOSED EXTERNAL WATER INFRASTRUCTURE. SOURCE: CIVIL ENGINEERING INFRASTRUCTURE REPORT (APPENDIX L).

5.9.4 Power and communications

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

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

Discussions with Aurora and Chorus in March 2026 confirm that the Project's power and communication needs can be met through their networks. Letters of confirmation are included within **Appendix L**.

5.10 Earthworks

Earthworks applied for under this application comprise all earthworks outside the residential development area. See **Figure 29** below for the approximate extent of earthworks covered under this application. Earthworks for the residential development area are being sought separately by district consent RM260566 and regional consent RM26.282. Earthworks will encompass a broad spectrum of activities to enable development of the wider Site, including transport and infrastructure development. Earthworks for the development will extend across the Site external to the three main lots, and will comprise a cut-to fill operation. This approach is intended to achieve a balanced earthworks solution, minimising the need for imported or exported material (excluding topsoil export). It will also reduce environmental disturbance associated with haulage and off-site disposal.



FIGURE 29. APPROXIMATE EXTENT OF EARTHWORKS. SOURCE: FIGURE 2 OF THE EMP ATTACHED WITHIN APPENDIX L

Earthworks for the external infrastructure are estimated to comprise approximately 6,500m³ for the Stage 1 wastewater works, 1,200m³ for the Stage 2 wastewater works, and 10,000m³ for the water supply works.

The estimates are indicative and based on the current level of design and are provided to give an indication of the scale of works associated with the proposed external public infrastructure upgrades. The final extent of infrastructure upgrades, associated earthworks volumes, and construction methodology will be confirmed through the subsequent Engineering Approval process and detailed design.

It is noted that the earthworks volumes necessary to facilitate the roading upgrades to Lower Shotover Road, State Highway 6 and associated intersections are anticipated to be minimal as the design is aimed to closely mimic the existing surface. This will be confirmed and full extent detailed in the next phase of design.

A draft EMP has been prepared by McKenzie and Co, and is included within **Appendix L**.

The draft EMP includes measures for erosion and sediment control, dust suppression, stabilisation of exposed surfaces, and protection of downstream environments. The EMP will also integrate standard construction management practices, including site access protocols, stockpile management, and monitoring requirements to ensure compliance with consent conditions. The draft EMP will be updated post consent, through the detailed design stage and prior to construction, to enable collaboration with earthworks contractors and confirm final staging of the development through detailed design and development planning phases.

A draft ESCP has also been produced and is attached within the EMP included in **Appendix L**. Key elements of the erosion and sediment control measures proposed are as follows:

- Temporary Soakage ponds will be utilised to capture and treat the sediment - laden runoff from the site.
- Silt fences as required to form a barrier to the sheet flow where there is the possibility of sediment - laden surface runoff leaving the site.
- A diversion bund will be installed around the earthworks area to divert the sediment-laden runoff into the retention pond.
- Clean water diversion bunds will be constructed to divert and collect upstream catchment runoff away from the earthwork areas.
- Establish stabilised construction entrances to the site.
- Topsoil will be stripped and stockpiled on site.
- Topsoil will be re-spread upon completion of earthworks.
- Keep topsoil stockpile away from the boundary.
- Cover and protect the topsoil to prevent spilling due to rain.
- Conduct daily inspections to ensure sediment control measures follow the designs.
- The erosion and sediment control measures will be removed, once the earthwork area stabilizes.
- Stabilising the building platforms, accessway, and carparking area (i.e. metal/concrete) as soon as practical to ensure safe and tidy access for the following building construction stage of the dwellings.
- Ensure any new cesspits on the proposed accessway and any existing cesspits in the road reserve have geotextile cloth installed across the lid to filter runoff that is entering any private or public stormwater system.
- Monitor weather forecasts and check erosion and sediment measures are in place before leaving the site, especially on weekends.
- Monitor the site after any inclement weather events and repair and mitigation devices, as necessary.
- Daily inspections to ensure sediment control measures are operating efficiently. Regular maintenance of the devices will also be necessary to ensure their effectiveness during bulk earthworks operations

Further details as to the specific designs of sediment control devices, is shown in the EMP in **Appendix L**.

Construction traffic will be managed through the TMP, which will address vehicle types, haul routes, access points, and any necessary timing restrictions to avoid peak periods. The plan will ensure safe and efficient operation of the surrounding road network while accommodating the movement of earthmoving equipment and construction vehicles. A condition of consent is proposed regarding a TMP.

Collectively, these management plans will ensure that earthworks are undertaken in a controlled, coordinated, and environmentally responsible manner.

5.11 Waste Management

Waste management infrastructure has been designed to support the full operational needs of the development and to ensure waste is stored, handled, and collected in a manner that avoids adverse effects on the environment.

The proposed development will utilise a communal waste management system comprising sixteen dedicated bin storage buildings distributed throughout the residential development. A typical bin store is shown in **Figure 30**. The location and size of each waste storage area have been designed to provide convenient access for residents, and is sized according to the number of units and occupants it serves.

The Operational Waste Management Plan (OWMP) prepared by WM New Zealand and attached as **Appendix O** confirms that the waste areas have been designed using the Auckland Council Multi-Unit Development Space Calculator, which is the accepted industry standard where no region-specific calculator exists. This ensures that waste volumes have been estimated using recognised methodology and that bin numbers and collection frequencies are appropriately matched to demand.



FIGURE 30. TYPICAL BIN STORAGE AREAS. SOURCE: ARCHITECTURAL DRAWINGS, SHEET SK88 (APPENDIX C)

Each waste storage area provides for the separation of waste streams, including general waste, mixed recycling (plastics 1, 2 and 5; aluminium and steel cans; paper and cardboard), and glass recycling. The OWMP sets out the calculated weekly volumes for each waste stream and

identifies the corresponding bin sizes, quantities, and collection frequencies required to service each waste area. Across the development, collection frequencies range from two to four times per week depending on occupancy and waste generation rates. WM New Zealand has confirmed it can provide the recommended services and collection schedule for the development.

All waste will be stored within enclosed, purpose-built waste rooms located on private land. These facilities have been designed to provide appropriate ventilation, hygiene standards, manoeuvring space, and operational functionality. The waste storage areas are positioned to enable convenient access for residents while also facilitating safe and efficient waste collection. Vehicle tracking demonstrates that collection vehicles can enter, manoeuvre within, and exit the development safely via Lower Shotover Road.

The Project does not rely on QLDCs public kerbside collection service. All waste storage and collection activities will occur within the development boundary. While no food waste collection service is currently available in Queenstown, the OWMP confirms that the proposed system can be adapted to accommodate future food waste collection should such a service become available.

The OWMP includes defined roles and responsibilities for building management and the waste service provider, including requirements for bin hygiene, signage, general cleanliness, noise management, and health and safety. These operational measures ensure that waste is managed in a manner that avoids odour, litter, noise, and other potential adverse effects.

The Project provides a comprehensive, private waste management system designed to meet the operational needs of the development and to ensure waste is managed in accordance with recognised best practice. The system has been developed by qualified experts and is supported by detailed calculations, design specifications, and operational procedures.

5.12 Subdivision

The development has been designed as a comprehensive land use Project. All buildings, roading, infrastructure, open space networks and landscape treatments are intended to be constructed and completed prior to any subdivision occurring.

Following completion of the physical works, subdivision is proposed to create feesimple and vesting lots for roading, open space and infrastructure. The subdivision is therefore a secondary titling exercise that reflects ownership, management and operational requirements rather than driving the built form.

The proposed subdivision will create:

- six fee simple superlots for the residential and commercial components of the development;
- one local purpose reserve (recreation) to potentially vest in QLDC; and
- five road lots to vest in QLDC.

The proposed subdivision layout is shown in **Figure 31** and detailed in **Table 4** below.



FIGURE 31. PROJECT SCHEME PLAN. REFER TO APPENDIX L FOR THE FULL PLANS.

TABLE 4: PROPOSED SUBDIVISION DETAILS

<i>Proposed Lot Number</i>	<i>Purpose</i>	<i>Area</i>
1	Fee Simple Allotment	2.0185Ha
2	Fee Simple Allotment	2.3152Ha
3	Fee Simple Allotment	2.0213Ha
4	Fee Simple Allotment	1.8841Ha
5	Fee Simple Allotment – Referred to as Commercial Development Lot	2165m ²
6	Fee Simple Allotment	5153m ²
7	Open space - To potentially vest in QLDC	4019m ²
101	Road to Vest in QLDC – collector Road C1	5403m ²
102	Road to Vest in His Majesty the King	992m ²
103	Road to Vest in QLDC	254m ²
104	Road to Vest in QLDC	43m ²
105	Road to Vest in QLDC	49m ²

Lots 102 – 105 are to facilitate the active travel route continuing from the SH6 as required by the TPLM provisions.

Pedestrian easements are proposed to provide two north south links from the SH6 to the vested collector Road C1 (proposed Lot 101). A further pedestrian link is proposed horizontally through the site providing connectivity from the neighbouring development lot the east to Lower Shotover Road to the west of the site. Refer to **Figure 19** above for the easement plan.

Easements to secure public trunk infrastructure within the residential development area will be confirmed prior to certification under section 223 of the RMA.

Easements to protect three waters internal reticulation between private lots will be confirmed prior to certification under section 223 of the RMA.

Right of way easements are also proposed on the scheme plan to enable legal access over private roads for corresponding lots within the development. Conditions are proposed for the establishment of easements, as set out in the suite of conditions in **Appendix Y**.

PART 2 – APPROVAL-SPECIFIC REQUIREMENTS

6 APPROVALS RELATING TO THE RMA (UNDER SECTION 42(4)(A) AND 42(4)(C))

6.1 Overview

This section addresses the resource consent approvals sought under section 42(4)(a) of the FTAA and the Certificates of Compliance sought under section 42(4)(c).

This application seeks all resource consents required for the construction, operation, maintenance and use of the Project, except where activities are otherwise authorised by an existing resource consent as detailed in previous sections, or where it is subject to a Certificate of Compliance sought as part of this application.

Certificates of Compliance are sought for activities that comply with the relevant permitted activity standards of the Otago Regional Plan: Water for Otago (ORPW) and the Otago Regional Plan: Air for Otago (ORPA).

For completeness, the application also seeks approval for any additional resource consents that may subsequently be identified as necessary during the assessment process.

The resource consent and Certificate of Compliance components of this application have been prepared in accordance with Schedule 5 of the FTAA.

In summary, the Project overall requires resource consent as a non-complying activity under the Queenstown Lakes PDP.

6.2 Resource Consents Sought

Pursuant to section 42(4)(a) of the FTAA, this application seeks all approvals required for the Project under the RMA for the subdivision and use of land, together with associated enabling works, activities, and infrastructure.

A summary of the resource consent requirements of the Application is provided in **Table 5** below. A comprehensive assessment of the Project against all relevant rules in the District and Regional Plans is contained in **Appendix Z**.

TABLE 5: SUMMARY OF CONSENTS SOUGHT

<i>Consent Type</i>	<i>Plan Chapter</i>	<i>Summary of Activity Requiring Consent</i>	<i>Overall Activity Status</i>
Land Use Consent	QLPDP Chapter 49 – TPLM Zone	Residential development, non-residential buildings, temporary worker accommodation, buildings within the Building Restriction Area, departures from the Structure Plan, staging, and built form infringements including height, recession planes, landscaping,	Non-Complying

building setbacks, outdoor living space, storage and building length.

Land Use Consent	QLPDP Chapter 15 – Local Shopping Centre Zone	Buildings in the Local Shopping Centre Zone, staging of development, residential activities at ground floor level and building height.	Non-Complying
Earthworks	QLPDP Chapter 25 – Earthworks	Earthworks for external infrastructure exceeding permitted thresholds for volume, contiguous area, depth of cut, height of fill, setbacks, setbacks from waterbodies, and cleanfill movements.	Restricted Discretionary
Subdivision	QLPDP Chapter 27 – Subdivision and Development	Subdivision within the TPLM Zone and Local Shopping Centre Zone, subdivision that is not wholly consistent with the Structure Plan due to the proposed location of roads and open space.	Non-Complying
Transport	QLPDP Chapter 29 – Transport	High traffic generating activity, parking associated with activities that are not otherwise permitted or controlled, formation of unformed road, and non-compliance or potential non-compliance with some transport access standards.	Discretionary
Energy and utilities	QLPDP Chapter 30 – Energy and Utilities	Stormwater detention and retention infrastructure, above-ground pipelines, ancillary utility structures and renewable energy infrastructure where standards are not met.	Discretionary
Regional earthworks and associated discharge	ORPW	Earthworks and associated discharges for infrastructure supporting the residential development, where the exposed earth area exceeds the permitted activity thresholds and/or earthworks may be located within 10 metres of a water body.	Restricted Discretionary

6.3 Overall Activity status

The Project requires a range of district and regional approvals with activity statuses ranging from restricted discretionary through to non-complying.

The highest activity status applicable to the Project is under the QLDC PDP, as a **Non-Complying Activity**. This status principally arises from:

- residential development and associated activities within the TPLM Zone;
- activities within the Local Shopping Centre Zone;
- subdivision and development activities that are not strictly in accordance with the TPLM Structure Plan; and
- staging of development.

Full details of the applicable rules and activity statuses are provided in the Rule Compliance Assessment contained in **Appendix Z**.

6.4 Permitted Activities (Schedule 5, clause 5(5)(a))

Clause 5(5)(a) of Schedule 5 of the FTAA requires that where a permitted activity forms part of the Project, the application must demonstrate that the activity complies with the applicable requirements, conditions and permissions so that a resource consent is not required under section 87A(1) of the RMA.

The Project includes a number of activities that are anticipated to comply with the relevant permitted activity standards, including activities regulated under the District and Regional Plans. Where activities are proposed to proceed on a permitted basis, compliance has been assessed as part of the detailed Rule Compliance Assessment contained in **Appendix Z**. The following section also includes those regional activities assessed as permitted under the relevant Regional Plans, for which Certificates of Compliance will be sought.

6.5 Certificates of Compliance (section 43(4)(c))

In addition to the resource consents sought through this Application, the Applicant seeks Certificates of Compliance under section 42(4)(c) of the FTAA for those regional activities that comply with the relevant permitted activity standards under the applicable ORPW and ORPA.

The regional activities proposed to be authorised through Certificates of Compliance are summarised in **Table 6** below.

TABLE 6: SUMMARY OF CERTIFICATES OF COMPLIANCE SOUGHT

Activity Type	Plan Rule Triggered	Description of Activity	Activity Status
Stormwater	ORPW Rule 12.B.8 – Discharge of stormwater from a reticulated stormwater system onto land where it may enter water	Complies – The discharge of stormwater resulting from rainfall events exceeding the 1% AEP event will be from a reticulated stormwater system and will not discharge to a Regionally Significant Wetland. Provision has been made for the interception and removal of contaminants that could give rise to the adverse effects identified in condition (d) of the rule. The discharge will not contain human sewage and will not result in flooding of adjoining properties, erosion, land instability, sedimentation, or property damage. The stormwater discharge will also meet the requirements of condition (d) after reasonable mixing.	Permitted
Stormwater	ORPW Rule 12.B.9 – Discharge of stormwater from any road not connected to a reticulated	Complies – The discharge of stormwater from any road not connected to a reticulated stormwater system will not cause flooding on adjoining properties, erosion, land instability, sedimentation, or property damage. For any works on roads, provision will be made for the interception of any contaminant to avoid, after reasonable mixing the requirements of condition (b) of this rule.	Permitted

stormwater
system

Air discharge	ORPA Rule 16.3.10.2 – Discharges of energy	Complies - Except as provided for by the Rules in section 16.3.1 to 16.3.9, the discharge into air of: (1) Air heated above ambient temperature, including but not limited to heated air from heat exchangers, and air used for the purpose of cooling plant and equipment; or (2) Energy from sources of electromagnetic radiation, including radio and television transmitters and other telecommunications facilities, cell phones, and generators; (3) Heat generated by transmission lines and ancillary equipment; is a permitted activity.	Permitted
Air discharge	ORPA Rule 16.3.13.1 – Discharges from miscellaneous activities	Complies – The discharge of contaminants into air from building and construction activities, including road construction and maintenance is a permitted activity under this rule. No seal burning is proposed. Any discharge to air will meet the requirements of this rule.	Permitted

7 SCHEDULE 5 INFORMATION REQUIREMENTS (RMA APPROVALS)

This application seeks approvals that would otherwise be sought under the RMA under section 42(4)(a) (Resource consents) and 42(4)(c) (Certificates of Compliance) of the FTAA.

The following subsections address the respective information requirements of section 43(3)(a) and 43(3)(c) of the FTAA, as set out in clause 5 and 11 of Schedule 5, except where those matters are addressed elsewhere in this application.

Clauses 5(5)(b), 5(5)(c) and 11(2) are not applicable as the Project is not located within an area subject to a planning document prepared by a customary marine title group or ngā hapū o Ngāti Porou, nor is it located within a taiāpure-local fishery, mātaihai reserve, or an area subject to bylaws made under Part 9 of the Fisheries Act 1996. Clause 5(6) is also not applicable as the Site is not Māori land in multiple ownership. Clause 5(7) is also not applicable as the application is lodged by the single authorised person.

7.1 Compliance with section 46(2)(a), (b), and (d) (Schedule 5, clause 5(1)(c) and clause 11(1)(b))

Clause 5(1)(c) and 11(1)(b) of Schedule 5 requires confirmation that the resource consents and certificates of compliance comply with section 46(2)(a), (b), and (d). The application complies with section 46(2) of the FTAA for the following reasons:

- The application has been prepared to comply with sections 42, 43 and 44 of the FTAA.
- The application relates solely to the Project, being a referred project under the FTAA.
- The Project does not involve any ineligible activities as defined in section 5 of the FTAA.
- All applicable fees, charges and levies payable in respect of the application will be paid in accordance with the requirements of the FTAA and associated regulations.

Accordingly, the application satisfies the requirements of section 46(2) of the FTAA.

7.2 Any Other Activities (Schedule 5, clause 5(1)(e))

This section is provided in accordance with clause 5(1)(e) of Schedule 5 of the FTAA. There are no other activities that are part of the Project to which the Application relates.

7.3 Other Approvals Required (Schedule 5, clause 5(1)(f) and 11(1)(c))

This section of the application is provided in accordance with clause 5(1)(f) and 11(1)(c) of Schedule 5 of the FTAA, that an application provides a description of any other resource consents, notices of requirement for designations, or alterations to designations required for the Project to which the consent application relates.

As discussed in Section 4.9.9 of this report, in addition to the approvals sought through this application, SLL is progressing resource consent application RM260566 with QLDC and RM26.282 with ORC. These applications relate to:

- enabling works limited to earthworks across the residential development area; and
- the removal of existing consent notices affecting the residential development area, as this cannot be achieved through the FTAA process.

Accordingly, RM260566 and RM26.282 form part of the wider approvals framework for the Project but are being progressed separately to this Substantive Application.

No other resource consents, notices of requirement for designations, or alterations to designations are required for the Project.

7.4 Assessment of Relevant Statutory Documents (Schedule 5, clause 5(1)(h))

This section has been prepared to address the requirements of clauses 5(1)(h), 5(2) and 5(3) of Schedule 5 of the FTAA.

This section addresses the requirements of clauses 5(1)(h), 5(2) and 5(3) of Schedule 5 of the FTAA. Clause 5(1)(h) requires a Substantive Application to include an assessment of the proposed activity against the relevant provisions of the statutory documents listed in clause 5(2). Where relevant, clause 5(3) prescribes how that assessment is to be undertaken in relation to proposed planning documents.

The statutory documents required to be considered under clause 5(2) are:

- a) a national environmental standard;*
- b) other regulations made under the Resource Management Act 1991;*
- c) a national policy statement;*
- d) a New Zealand coastal policy statement;*
- e) a regional policy statement or proposed regional policy statement;*
- f) a plan or proposed plan; and*
- g) a planning document recognised by a relevant iwi authority and lodged with a local authority*

The following sections assess the Project against each relevant statutory document identified in clause 5(2), in the order set out in Schedule 5 of the FTAA.

7.4.1 National Environmental Standards (Schedule 5, clause 5(2)(a))

The following National Environment Standard (NES) is considered potentially relevant to the Project:

- The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS)

The following NES have been assessed and are not considered to be relevant to the Project:

- National Environmental Standards for Air Quality 2004
- National Environmental Standards for Commercial Forestry 2023
- National Environmental Standards for Freshwater 2020
- National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat 2023
- National Environmental Standards for Marine Aquaculture 2020
- National Environmental Standards for Sources of Human Drinking Water 2007
- National Environmental Standards for Storing Tyres Outdoors 2021
- National Environmental Standards for Telecommunication Facilities 2016
- National Environmental Standards for Electricity Transmission Activities 2009
- National Environmental Standards for Detached Minor Residential Units 2025
- National Environmental Standards for Papakāinga 2026

An assessment of the Project against the relevant NES is provided in the following section.

7.4.1.1 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS)

The NES-CS is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed, and if necessary, the land is remediated or the contaminants contained to make the land safe for human use.

Under the NES-CS, land is considered actually or potentially contaminated if an activity or industry on the HAIL list has been, is, or is more likely than not to have been undertaken on the land.

As discussed in Section 4.7 of this report, a review of available contaminated land information has been undertaken, including the ORC SLUR and the PSI prepared as part of the TPLM Plan Variation process. This PSI is attached as **Appendix V**. The PSI reviewed SLUR and HAIL records, historical aerial imagery, and current and historic land uses across the wider TPLM growth area.

The PSI concluded that no HAIL activities were identified within the residential development area or the proposed transport infrastructure works. Accordingly, those areas are not considered to be actually or potentially contaminated land for the purposes of the NES-CS. The residential development area is currently and has historically been used predominantly for rural and pastoral purposes, and there is no evidence to indicate that activities or industries listed on the HAIL have occurred within the residential development area.

A review of the ORC SLUR undertaken for this application identified several recorded HAIL sites in the vicinity of the proposed water supply infrastructure works. However, these sites are located adjacent to, rather than within, the proposed watermain alignment, and the alignment itself does not traverse over any identified HAIL site. The potential for contaminant migration into the proposed watermain alignment is considered very low.

While the likelihood of encountering contaminated material is considered low, the Applicant acknowledges the proximity of these recorded HAIL sites to the proposed water supply infrastructure works. To manage the unlikely event that contaminated material is encountered during construction, an unexpected contamination discovery protocol is proposed as a condition of consent. This will ensure that any contaminated soil encountered during earthworks is appropriately managed in accordance with best practice and relevant regulatory requirements.

On the basis of the available information, the Site is not considered to be actually or potentially contaminated land for the purposes of the NES-CS. Accordingly, the activities proposed do not trigger the NES-CS and consent under the NES-CS is not required.

7.4.2 Other Regulations (Schedule 5, clause 5(2)(b))

The following other regulations are considered relevant under the RMA:

- Water Conservation (Kawarau) Order 1997 National Policy Statements (Schedule 5, clause 5(2)(c))

7.4.2.1 Water Conservation (Kawarau) Order 1997

The Water Conservation (Kawarau) Order 1997 (the Order) came into force on 14 April 1997. The Order recognises that the Kawarau River, Shotover River and other identified water bodies contain outstanding amenity and intrinsic values that warrant protection.

Schedule 2 of the Order identifies the Shotover River mainstem as a protected water body. The protected reach extends from approximately NZMS260 coordinates S132:645720 (44°34'14"S, 168°40'14"E), at the confluence of Tyndall Creek and Tummel Burn, to S114:542262 (45°01'08"S, 168°46'05"E), at the confluence of Shotover River with the Kawarau River.

The outstanding characteristics and values recognised for the Shotover River include its wild and scenic character, natural characteristics (particularly its high natural sediment load and active delta at the confluence with the Kawarau River), scientific values, recreational opportunities including rafting, kayaking and jet boating, and historical significance associated with gold mining. The Order also prohibits damming of the Shotover River and requires water quality to be managed to a Class CR standard.

Clause 4 of the Order provides that the outstanding amenity and intrinsic values of the water bodies identified in Schedule 2 are to be sustained.

The Project does not involve any damming, diversion or abstraction of water from the Shotover River and therefore will not affect the river's flow regime or physical character. Potential effects on the outstanding values recognised by the Order are limited primarily to temporary water quality effects during the construction phase and, to a lesser extent, the quality of stormwater discharged from the completed development.

Construction activities such as earthworks have the potential to generate sediment-laden runoff which could enter receiving environments if not appropriately managed. An increase in sediment discharge could adversely affect the natural characteristics and scientific values of the Shotover River, including its recognised high natural sediment load and associated river processes. To address this risk, erosion and sediment control measures will be implemented and maintained

throughout the construction period in accordance with approved management plans and industry best practice. These measures are intended to minimise the mobilisation of sediment and prevent uncontrolled discharge to downstream water bodies.

Following completion of the development, stormwater generated from impervious surfaces will be managed through the proposed stormwater treatment and disposal systems. These measures are designed to treat contaminants and attenuate flows prior to discharge, thereby reducing the potential for adverse effects on downstream water quality.

The only component of the Project located in proximity to a waterbody is the proposed watermain upgrade within the marginal strip adjacent to the Shotover River. As a result, limited earthworks may occur within 10 metres of the river. The works are limited in extent and scale and will be undertaken using best-practice construction, erosion and sediment control methodologies to minimise the potential for sediment discharge or other adverse effects on the river environment. Given the nature of the works, their temporary duration, and the proposed management measures, the Project is not anticipated to adversely affect the wild and scenic character, natural characteristics, scientific values, recreational values, or historical values protected by the Water Conservation Order.

Given the separation distance between the development site and the Shotover River, the temporary nature of construction-related effects, and the implementation of proposed erosion, sediment and stormwater management measures, the Project is not anticipated to adversely affect the wild and scenic character, natural characteristics, scientific values, recreational values or historical values for which the Shotover River is protected under the Order.

Accordingly, the Project is considered consistent with the protections and restrictions contained within the Order and is not expected to adversely affect the outstanding characteristics and values of the Shotover River recognised by the Order.

7.4.3 National Policy Statements

The following National Policy Statements (NPS) are considered relevant to the Project:

- The National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB)
- The National Policy Statement on Urban Development (NPS-UD)
- The National Policy Statement for Freshwater Management 2020 (NPS-FM)
- National Policy Statement for Natural Hazards 2025 (NPS-NH)
- National Policy Statement for Infrastructure 2025 (NPS-I)
- National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG)

The following NPS have been reviewed and are not considered to be relevant to the Project:

- National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023
- National Policy Statement for Electricity Networks 2008
- The National Policy Statement on Highly Productive Land 2022

An assessment of the Project against the relevant NPS is provided in the following sections.

7.4.3.1 National Policy Statement for Indigenous Biodiversity 2023 (as amended December 2025)

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

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

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

7.4.3.2 National Policy Statement on Urban Development 2020 (as amended May 2022)

The NPS-UD provides national direction for urban growth and development by seeking well-functioning urban environments, improved housing affordability, sufficient development capacity, integrated infrastructure planning, and urban environments that support climate resilience and reduced greenhouse gas emissions. The Project is considered to be consistent with the relevant objectives and policies of the NPS-UD, particularly Objectives 1, 2, 3, 4 and 8 and Policies 1, 2, 5 and 6.

Objectives 1, 2, 3 and 4 – Well-functioning Urban Environments, Housing Affordability and Urban Growth

Objectives 1, 2, 3 and 4 seek urban environments that support social, economic and cultural wellbeing, improve housing affordability through competitive land and development markets, enable growth in accessible and high-demand locations, and recognise that urban environments and their amenity values will change over time in response to the needs of communities and future generations.

The Project is consistent with these objectives.

The residential development area forms part of TPLM, a strategic growth area specifically identified to accommodate significant urban development within the Queenstown Lakes District. The planning framework anticipates substantial residential growth supported by integrated transport networks, community facilities, open space and supporting infrastructure.

The Project will deliver 1,085 residential units, making a significant contribution towards addressing the housing supply and affordability challenges experienced within the district. The Project will increase housing choice through a range of residential typologies and tenure

opportunities, while increasing the availability of long-term rental accommodation in a district experiencing strong housing demand.

The Project will establish a comprehensively planned urban neighbourhood incorporating residential development, local commercial opportunities, community facilities, public and private open space, and connected walking and cycling networks. Collectively, these elements will contribute to a well-functioning urban environment that enables people and communities to provide for their social and economic wellbeing, while supporting a safe, accessible and connected neighbourhood.

The NPS-UD recognises that urban environments, including their amenity values, will develop and change over time in response to the diverse and changing needs of people and communities. The urbanisation proposed by the Project is anticipated through the TPLM planning framework and is consistent with the strategic growth outcomes envisaged for the area.

Accordingly, the Project is considered to be consistent with Objectives 1, 2, 3 and 4.

Objective 8 – Climate change and resilience

Objective 8 seeks urban environments that support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.

The Project promotes a compact urban form within a planned growth area and incorporates extensive pedestrian and cycle connections, future public transport integration, EV charging infrastructure and rooftop solar generation. These measures support reductions in transport-related and operational greenhouse gas emissions over time.

The Project also incorporates integrated stormwater management, climate-adjusted infrastructure design and consideration of natural hazard risks to support long-term resilience to future climate conditions.

Accordingly, the Project is considered to be consistent with Objective 8.

Policy 1 – Well-functioning urban environments

Policy 1 directs that planning decisions contribute to well-functioning urban environments. The Project is consistent with Policy 1 as it provides:

- a variety of housing types through one-bedroom, two-bedroom and three-bedroom apartments;
- significant additional housing supply in a location specifically intended for urban growth;
- local commercial opportunities and community facilities;
- strong accessibility between housing, employment, community services and open space through walking, cycling and future public transport connections;
- infrastructure that supports long-term urban growth;
- reductions in greenhouse gas emissions through compact urban development and transport choice; and
- resilience to climate change through integrated infrastructure design.

Policy 2 – Sufficient Development Capacity

Policy 2 requires local authorities to provide sufficient development capacity to meet expected demand for housing and business land over the short, medium and long term.

While Policy 2 is directed primarily at local authorities, the Project is consistent with the outcome sought by the policy through the delivery of 1,085 residential units within an area identified for future urban growth. The Project represents a significant increase in residential development capacity and will make a meaningful contribution towards meeting future housing demand within the Queenstown Lakes District.

Policy 5 – Enabling Heights and Density in Tier 2 and 3 Urban Environments

Policy 5 requires planning frameworks applying to Tier 2 and 3 urban environments to enable building heights and density commensurate with accessibility and demand.

The Project is consistent with the urban development outcomes anticipated by Policy 5. The Project is located within a strategic growth area intended to accommodate more intensive residential development and is supported by planned active transport, public transport and infrastructure investment. The density proposed reflects both the significant housing demand present within Queenstown and the strategic planning framework established for TPLM.

Policy 6 – Planning decisions affecting urban environments

Policy 6 requires decision-makers to have particular regard to the planned urban built form anticipated by planning documents that have given effect to the NPS-UD, the benefits of urban development that are consistent with well-functioning urban environments, the contribution that development will make towards providing development capacity, and the likely current and future effects of climate change.

The TPLM planning framework expressly anticipates substantial urbanisation, increased residential density and significant housing growth. The Project directly implements those planned urban outcomes by delivering a comprehensively planned neighbourhood within a location identified for future urban development.

Policy 6 also recognises that the planned urban built form anticipated by planning documents may involve significant change and that such change may detract from amenity values appreciated by some people while improving amenity values appreciated by others, including through the provision of increased and varied housing densities and types. Importantly, Policy 6 recognises that such changes are not, of themselves, adverse effects.

The Project will provide significant public benefits through the delivery of 1,085 new dwellings, improved housing choice, a substantial build-to-rent housing supply, supporting infrastructure, community facilities, active transport connections and open space. The Project will make a significant contribution towards increasing development capacity within the Queenstown Lakes District while supporting climate change mitigation and resilience outcomes.

Accordingly, the Project is strongly aligned with the matters to which decision-makers are directed to have particular regard under Policy 6.

Overall Assessment

Overall, the Project is consistent with the relevant objectives and policies of the NPS-UD. The Project will deliver a significant increase in housing supply and development capacity within a strategically identified growth area, with a build-to-rent model that responds directly to housing affordability and rental accommodation challenges within the Queenstown Lakes District. The Project supports a well-functioning urban environment, implements the planned urban growth outcomes anticipated for TPLM, and contributes positively to climate change mitigation and resilience outcomes. The Project is therefore considered to be consistent with the purpose and intent of the NPS-UD.

7.4.3.3 National Policy Statement for Freshwater Management 2020 (as amended December 2025)

The NPS-FM provides national direction for the sustainable management of freshwater resources, with a focus on protecting freshwater values, maintaining or improving water quality, and avoiding the loss or degradation of wetlands and streams. The NPS-FM requirements include:

- Managing freshwater in a way that 'gives effect' to Te Mana o te Wai;
- Improving degraded water bodies, and maintaining or improving all others; and
- Avoiding any further loss or degradation of wetlands and streams, map existing wetlands, and encourage their restoration.

There are no rivers, lakes, streams or wetlands located within the residential development area or the wider Site, and the Site is not identified as containing any Significant Natural Areas. Stormwater generated by the Project up to the 1% AEP event will be managed onsite through an integrated treatment, detention and soakage system designed in accordance with relevant standards and best practice.

During rainfall events exceeding the 1% AEP event, stormwater will be conveyed via designed overland flow paths toward Lake Hayes. No wetlands or significant freshwater habitats have been identified within these overland flow paths.

The Project does not involve the loss of wetlands, modification of streams, or direct discharges to freshwater bodies. Stormwater treatment and disposal measures have been incorporated to maintain water quality and manage potential effects on downstream receiving environments.

Accordingly, the Project is considered consistent with the NPS-FM.

7.4.3.4 National Policy Statement for Natural Hazards 2025

The NPS-NH came into force on 15 January 2026 and establishes a nationally consistent framework for managing natural hazard risk associated with subdivision, use and development. The objective of the NPS-NH is that natural hazard risk to people and property is managed using a risk-based and proportionate approach.

Natural hazards were comprehensively considered through the TPLM Plan Variation process that enabled urban development of the wider TPLM area. However, that process was

undertaken prior to the NPS-NH taking effect. Accordingly, a project-specific review has been undertaken for this Project having regard to the objective, policies and risk framework established by the NPS-NH.

The NPS-NH identifies seven natural hazard risks requiring consideration: flooding, coastal erosion, coastal inundation, tsunami, landslip, liquefaction and active fault rupture. Consistent with Policy 1, natural hazard risk has been assessed with regard to the NPS-NH risk matrix. In accordance with Policy 5, the assessment has been informed by the best available information, including ORC natural hazard mapping, site-specific geotechnical investigations, flood modelling and stormwater assessments.

Those assessments indicate that the residential development area is not affected by coastal erosion, coastal inundation, tsunami or active fault rupture hazards. The development is also not subject to significant landslip hazards. While a low level of landslip risk has been identified within the residential development area, the Geotechnical Report (**Appendix N**) concludes that this risk can be appropriately managed through the proposed earthworks design and recommended geotechnical measures. The resulting landslip risk is assessed as low.

The residential development area is located within a liquefaction awareness area; however, the Geotechnical Report concludes that liquefaction and lateral spreading are not considered a risk to the proposed development. The Geotechnical Report further confirms that the development area is suitable for residential development subject to implementation of the recommended engineering and construction measures.

Flood modelling and stormwater assessments (contained within the Civil Engineering Infrastructure Report attached as **Appendix L**) demonstrate that flood-related risks can be appropriately managed through the proposed stormwater infrastructure, overland flow path design and finished floor level controls. Climate change allowances have been incorporated into the stormwater assessment, with stormwater flows up to the 1% AEP storm event (including climate change) captured onsite through a private gravity reticulation system and discharged via soakage systems. This approach has informed the design of the Project and demonstrates consideration of future climate change effects, consistent with Policy 6.

The above assessments indicate that the residential development is not subject to a very high level of natural hazard risk and that identified risks can be appropriately managed through the engineering and mitigation measures incorporated into the Project design. As such, the Project adopts a response that is proportionate to the level of risk identified, consistent with Policy 2, and does not give rise to circumstances where avoidance of development is required under Policy 3.

In relation to Policy 4, the available evidence indicates that the Project will not create or increase significant natural hazard risk on surrounding land. The flood modelling and stormwater assessments demonstrate that stormwater runoff and exceedance flows can be appropriately managed through the proposed design and associated mitigation measures.

Overall, natural hazard risks associated with the Project have been assessed using the NPS-NH risk matrix and the best available information. The available evidence demonstrates that the residential development is not subject to a very high level of natural hazard risk and that

identified risks can be appropriately managed through measures proportionate to the level of risk identified. The Project is therefore considered consistent with the NPS-NH.

7.4.3.5 National Policy Statement for Infrastructure 2025

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

The Project includes the development of infrastructure to support urban growth at TPLM, including transport, water supply, wastewater and stormwater infrastructure. Much of this external infrastructure will ultimately be vested in and operated by QLDC and will form part of the district's municipal infrastructure network.

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

- The Project enables the efficient provision and upgrading of infrastructure required to support planned urban growth within an area expressly identified for development through the TPLM Plan Variation.
- Infrastructure delivery is integrated with land use planning, ensuring that development is supported by timely and coordinated transport and three waters infrastructure, consistent with a well-functioning urban environment.
- The Project includes significant infrastructure investment, including upgrades that will provide capacity and resilience benefits beyond the development itself, facilitating urban development across the wider TPLM area.
- The Project plans a coordinated and staged infrastructure approach, aligning infrastructure provision with development sequencing to manage effects, reduce long-term costs and support efficient operation of networks.
- Any adverse effects associated with infrastructure construction and operation can be appropriately managed through design, staging, and standard consent conditions.

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

7.4.3.6 National Policy Statement for Renewable Electricity Generation 2011

The NPS-REG recognises the national benefits of renewable electricity generation and seeks to provide for renewable energy activities.

The Project incorporates rooftop solar panels on the proposed parking buildings. These panels meet the NPS-REG definition of community-scale renewable electricity generation, being renewable electricity generation with the primary purpose of supplying electricity to a community. The solar infrastructure will contribute to the energy needs of the development, reduce reliance on non-renewable energy sources, and support lower operational greenhouse gas emissions.

Accordingly, the Project is considered consistent with the NPS-REG by incorporating community-scale renewable electricity generation as part of a sustainable urban development.

7.4.4 New Zealand Coastal Policy Statement 2010 (amended 2025) (Schedule 5, clause 5(2)(d))

The NZCPS is not considered applicable to the Project as the Site is not located within or adjacent to the coastal environment.

7.4.5 Regional Planning Documents (Schedule 5, clause 5(2)(e))

7.4.5.1 Otago Regional Policy Statement 2021 (RPS)

The RPS provides the strategic framework for the management of Otago's natural and physical resources and includes provisions relating to urban growth, infrastructure, natural hazards, biodiversity, climate change and the built environment.

The Project is considered to be consistent with the relevant objectives and policies of the RPS. In particular, it provides for planned urban development within a strategically identified growth area, supports housing choice and affordability, integrates land use with infrastructure provision, and contributes to a well-functioning urban environment.

A detailed assessment of the Project against the relevant objectives and policies of the RPS is contained in **Appendix AA**.

7.4.5.2 Otago Regional Plan: Water for Otago

The ORPW is relevant to the Project as resource consent is sought for activities regulated under the ORPW, including earthworks and associated discharges.

The Project is considered to be consistent with the relevant objectives, policies and rules of the ORPW. The proposed stormwater management, erosion and sediment control measures, and discharge management framework have been designed to avoid, remedy or mitigate adverse effects on water resources and receiving environments.

A detailed assessment of the Project against the relevant provisions of the ORPW is contained in **Appendix AA**.

7.4.6 District Planning Documents (Schedule 5, clause 5(2)(f))

7.4.6.1 Queenstown Lakes Proposed District Plan

The residential development area is located within the TPLM Zone, a Special Purpose Zone introduced through the 2024 TPLM Plan Variation to the Queenstown Lakes PDP.

The TPLM Plan Variation was expressly introduced to enable substantial residential growth in response to Queenstown's acute housing pressures. It establishes a deliberate shift in land use within the TPLM Zone, particularly on the northern side of SH6, where the transition from a

pastoral landscape to a dense, urban residential environment is both anticipated and required to achieve the minimum density outcomes for the area.

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

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

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

The Project has been assessed against the relevant objectives and policies of the PDP, including those contained within Chapters 3 (Strategic Direction), 4 (Urban Development), 5 (Tangata Whenua), 6 (Landscape and Rural Character), 15 (Transport), 25 (Earthworks), 27 (Subdivision), 29 (Natural Hazards), 30 (Energy and Utilities), and 49 (TPLM Zone). A full assessment of the Project against the relevant objectives and policies of the PDP is provided in **Appendix AA**.

The discussion below focuses on those strategic and TPLM Zone provisions that are most relevant to the Project, and which contain the most directive language, including policies that seek to avoid particular outcomes. These provisions provide the clearest indication of the outcomes anticipated by the PDP and are therefore particularly relevant to the overall assessment of the Project.

- **Urban growth and development – Strategic Policies 3.3.15, 4.2.1.3 and 4.2.1.4** seek to avoid urban development outside Urban Growth Boundaries, support coordinated land use and infrastructure planning, and promote integrated development outcomes. The residential development is located entirely within the TPLM Zone and Urban Growth Boundary, implements a residential development within a strategic growth area specifically identified for urban expansion, and includes significant transport and three waters infrastructure upgrades integrated with the proposed development.
- **Kāi Tahu values and cultural matters – Strategic Policies 3.3.49 and 3.3.50** seek to recognise and provide for Kāi Tahu cultural values and relationships with ancestral lands, water, sites and resources. The Site is not located within a mapped Wāhi Tūpuna area or other identified site of cultural significance. Nevertheless, the Project incorporates water quality protection measures, indigenous planting, accidental discovery protocols, and ongoing engagement with mana whenua.
- **Landscape values – Strategic Policy 3.3.31** seeks to avoid adverse effects on the landscape values of Outstanding Natural Features (ONF) and Outstanding Natural Landscapes (ONL) where there is little capacity to absorb change. As discussed in Section

6.3 of the LEA (**Appendix F**), the Project is consistent with this policy, and avoids adverse effects on the nearby Slope Hill.

- **Housing supply and density – TPLM Policy 49.2.2.1** seeks to promote affordability and diversity of higher-density housing and avoid development that does not achieve the minimum residential density anticipated within the Medium Density Residential Precinct. The Project delivers a substantial supply of higher-density housing, provides a wide range of dwelling sizes and typologies, and exceeds the minimum density anticipated by the TPLM Zone.
- **Commercial activities, transport and infrastructure – TPLM Policies 49.2.5.2, 49.2.6.1 and 49.2.6.5** seek to maintain the planned distribution of commercial activities, avoid adverse effects on the transport network, and avoid occupation of buildings before specified transport infrastructure has been completed. While the Project proposes to relocate the Local Shopping Centre from the location shown on the Structure Plan, the alternative location at the corner of Lower Shotover Road and Road C1 is intended to better achieve the outcomes sought by the Zone. The proposed location provides improved accessibility, opportunities for kerbside parking, and results in a more functional and accessible neighbourhood centre that is better integrated with the proposed transport and active travel network.
- **Built form and amenity – TPLM Policy 49.2.7.10** seeks to avoid poor built form outcomes by requiring visually interesting development, active frontages, articulated building forms and high-quality landscaping. The Project incorporates varied building forms, active frontages, high levels of modulation, extensive landscaping, and well-overlooked streets and public spaces consistent with the outcomes sought by the policy.

Overall, the Project gives effect to the strategic direction of the PDP and the purpose of the TPLM Zone by delivering a comprehensively planned, infrastructure-supported, higher-density residential neighbourhood within a strategic growth area specifically identified for urban development. The Project implements the urbanisation, density, housing and infrastructure outcomes anticipated by the TPLM Zone while remaining consistent with the relevant strategic provisions of the PDP. A detailed assessment of the relevant objectives and policies is provided in **Appendix AA**.

7.4.7 Planning Documents Recognised by a Relevant Iwi Authority (Schedule 5, clause 5(2)(g))

The following planning documents recognised by a relevant iwi authority are considered relevant to the Project:

- Te Tangi a Taurira – The Cry of the People: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008; and
- Kāi Tahu ki Otago Natural Resource Management Plan 2005.

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

The Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 provides guidance for Ngāi Tahu ki Murihiku participation in environmental planning and

resource management, consolidating iwi values, knowledge, and perspectives as an expression of kaitiakitanga.

Relevant provisions include Policy 3.4.8.2, which seeks to ensure that building and development activities recognise landscape and geographic features of significance to Ngāi Tahu whānui; Policy 3.4.8.6, which seeks to protect instream values from the adverse effects of development, including impacts arising from discharges, water abstraction and cumulative effects over time; Policy 3.4.8.14, which seeks to ensure protocols are in place for the accidental discovery of cultural sites and material; and Policy 3.4.12.5, which promotes the protection and enhancement of waterways, riparian margins and wetlands to support indigenous biodiversity.

The Project is considered consistent with these directions, with construction and operational stormwater able to be appropriately managed to avoid adverse effects on water quality. Accidental discovery protocols are proposed as conditions of consent to guide in the event of an accidental discovery during works.

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

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

7.4.7.2 Kāi Tahu ki Otago Natural Resource Management Plan 2005

The Kāi Tahu ki Otago Natural Resource Management Plan 2005 provides guidance on the management of natural and physical resources within the Otago takiwā. Relevant provisions include Wai Māori General Policy 10, which encourages the treatment of stormwater prior to discharge, and Policy 16, which seeks revegetation of disturbed areas using locally sourced indigenous species. Also relevant are the Cultural Landscapes provisions relating to the recognition of Kāi Tahu's relationship with land, together with Policies 19, 20 and 21, which address earthworks management, accidental discovery protocols, sediment control and revegetation. The Wai Māori Policies for the Clutha/Mata-au Catchment are also relevant, particularly Policy 9, which encourages sound environmental practices where land use intensification occurs, and Policy 11, which encourages subdivision, land use, water and discharge consents associated with a development to be considered together.

The Project is considered consistent with the Kāi Tahu ki Otago Natural Resource Management Plan 2005, as it recognises Kāi Tahu's relationship with the Whakatipu landscape, incorporates measures to protect water quality and natural values, and supports sustainable land use within the takiwā. The Project has been designed having regard to the Plan's direction to recognise kaitiakitanga, avoid, remedy or mitigate adverse effects on waterways and mahika kai, and provide opportunities for engagement with Kāi Tahu. While the bulk earthworks within the residential development area have been applied for separately, this application incorporates the majority of consents required to authorise the Project and enables the integrated consideration of the various development components.

8 ASSESSMENT OF EFFECTS ON THE ENVIRONMENT (RESOURCE CONSENTS)

8.1 Overview

This section of the application is provided in accordance with clauses 5(4), 6 and 7 of Schedule 5 of the FTAA. These provisions require an assessment of the actual or potential effects on the environment. Clause 6 of Schedule 5 sets out information required to assess environmental effects. Clause 7 of Schedule 5 sets out the matters to be covered in the assessment of the environment effects.

Clause 7 of Schedule 5 of the FTAA outlines the matters to be covered in the assessment of environmental effects. This includes:

- a) *any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:*
- b) *any physical effect on the locality, including landscape and visual effects:*
- c) *any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:*
- d) *any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:*
- e) *any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:*
- f) *any unreasonable emission of noise:*
- g) *any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.*

These matters are addressed in the subsequent sections of this report.

The Site context and receiving environment are a relevant consideration to the Project and are set out in Section 4 above.

An assessment of all actual and potential effects on people and the environment is set out below, as well as within the supporting specialist reports submitted with this Application. It is considered that effects in relation to the following matters are relevant:

- Positive Effects
- Cultural Considerations
- Social Effects
- Economic Effects
- Structure Plan Integration
- Landscape Visual Effects
- Urban Design Effects

- Open Space and Public Access
- Landscape Design and Internal landscape Effects
- Built Form Effects
- Residential Amenity effects
- Ecological Effects
- Geotechnical Effects
- Construction-Related Effects
 - Earthworks
 - Soil Erosion, Generation and Run-Off of Sediment
 - Construction Noise and Vibration Effects
- Operational Noise Effects
 - Reverse Sensitivity
 - Operational Noise
- Traffic and Transport Effects
 - Internal Transport Effects
 - External Transport Effects
 - Construction Transport Effects
- Infrastructure Effects
- Waste Management
- Natural Hazards and Climate Change Effects
- Cultural and Archaeological Effects
- Subdivision Effects
- Effects Conclusion

The TPLM Special Purpose Zone establishes a bespoke planning framework for this location, and given that the majority of the Site sits within this Zone, the anticipated outcomes form the appropriate guiding principles for assessing the effects of this Project.

The TPLM Zone purpose is clear: **“Maximisation of housing provision and density is the overriding resource management priority.”**

As such, the TPLM Medium Density Precinct is not a suburban zone with modest uplift. The outcomes explicitly sought are:

- Higher than suburban density
- Distinct from the lower densities south of SH6
- A built, urban character
- At least 40 units/ha net

- Multi-storey typologies encouraged
- Density, choice, affordability prioritised over strict compliance with standards

The Structure Plan within the TPLM Zone seeks to guide development to achieve:

- Integration with key roading connections, intersections, and transport infrastructure
- Alignment with walk/cycle networks
- Support for public transport
- Contribution to open space and ecological networks
- Stormwater solutions that mimic natural hydrology and avoid adverse effects on Lake Hayes and the rivers

The policies guiding built form outcomes that justify greater density require:

- High-quality building and site design
- Active frontages and pedestrian-priority streets
- Avoiding blank walls
- Variation and modulation of massing
- Landscaped frontages
- Privacy and daylight outcomes
- Landscape amenity with indigenous planting

If built form standards are infringed, the PDP directs decision makers to apply the following hierarchy:

- Prioritise the achievement of housing density, (at higher densities than suburban) choice, and affordability and then (emphasis added)
- support this by prioritising key environmental and ecological outcomes, and then
- achievement of high-amenity, high-quality outcomes for and along streets, open spaces, and private ways having the function of a road. (Policy 49.2.2.5)

Although the Project exceeds what may traditionally be understood as “medium density” within the Queenstown context, the TPLM Zone anticipates a built, urban neighbourhood with densities higher than suburban and expressly prioritises maximising housing provision. The expert assessments confirm that the scale and form of the Project are consistent with those outcomes, and the height variation is used to achieve high-quality urban design rather than to introduce adverse effects.

8.2 Positive Effects

The Project accords with the purpose of the FTAA to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. The positive effects of the Project include:

- Providing greater housing choice through the introduction of a range of residential unit sizes within a long-term build to rent model. This will contribute to more diversity and include affordable options in a comprehensive urban development.
- Promoting the efficient use of a finite housing land resource by delivering compact urban development in a region where housing land is constrained. The Project represents a positive and efficient urban growth outcome that supports consolidated development in a suitable and strategically located area.
- A positive contribution to the amenity and character of the local neighbourhood through the landscape and urban design elements including street trees, landscaped accessways, multi-purpose reserve space, planting buffers, and connected pedestrian links.
- Supporting the delivery of a well-functioning urban environment, consistent with the NPS-UD, by providing housing close to future schools (confirmed by MOE within **Appendix U**), amenities, transport links and network infrastructure.
- Delivering significant infrastructure benefits by bringing forward transport and three waters upgrades required to support urban growth within TPLM. Several of these works form part of QLDC's wider infrastructure planning, and will be funded and delivered by SLL ahead of QLDC's current programme, with public infrastructure to be vested in QLDC for the benefit of the wider growth area.
- Supporting local businesses and suppliers during construction and in the long term through increased population, consumer demand and ongoing operational activity associated with the build-to-rent model. The Project will also generate substantial economic benefits through construction expenditure, employment, and permanent roles associated with property management and maintenance.
- Adopting best practice construction management methodology to ensure potential effects associated with the construction phase of the Project are appropriately avoided, remedied, or mitigated through a comprehensive suite of management plans and controls proposed via conditions of consent.

Ultimately, the above positive effects can be realised more quickly through the FTAA process compared to a traditional resource consenting process under the RMA.

8.3 Cultural Considerations

Engagement with mana whenua highlighted several key cultural considerations for the Project, with particular emphasis on the importance of stormwater management and the protection of water quality. Feedback also emphasised the value of incorporating native vegetation and ensuring that cultural values are reflected in the design and delivery of the development.

In response to the matters raised through engagement, and as detailed in **Appendix U**, the Project incorporates a range of measures that directly address these cultural considerations:

- Best-practice stormwater management - The development adopts a comprehensive stormwater management system designed to protect water quality, manage runoff, and support healthy receiving environments, reflecting mana whenua priorities relating to wai.

- No groundwater take - The Project does not include any groundwater abstraction, avoiding potential effects on aquifers and aligning with cultural concerns regarding the protection of freshwater systems.
- Native planting - Indigenous vegetation will be incorporated throughout reserves, road corridors, buffers and stormwater areas, supporting ecological enhancement, reinforcing local ecosystems, and reflecting cultural values associated with native species.
- Accidental Discovery Protocol - While no archaeological sites or wāhi tapu have been identified within the development area, an Accidental Discovery Protocol will be implemented in accordance with HNZPT guidelines to ensure appropriate cultural processes are followed should any material be uncovered.

The Applicant acknowledges mana whenua as kaitiaki of the area and recognises the deep cultural connection to the whenua and awa. The Project is committed to maintaining a positive and enduring relationship with mana whenua throughout its lifecycle, ensuring that cultural values continue to inform both design and implementation.

Overall, the cultural values expressed through engagement have meaningfully influenced the development's design, environmental management approach, and landscape strategy. These values will continue to shape the Project as it progresses into detailed design and delivery, ensuring that cultural considerations remain integral to its development. Any adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project

8.4 Social Effects

The Project has been designed to support positive social outcomes by providing a well-planned residential neighbourhood that contributes to the lifestyle, cohesion, housing supply and community wellbeing, and long-term resilience within the Queenstown Lakes District. The development responds to a well-documented shortage of long-term rental accommodation in Queenstown and will provide approximately 1,085 purpose-built rental homes in a location identified for urban growth. In doing so, the Project will make a substantial contribution to meeting the housing needs of current and future residents while supporting the efficient and sustainable development of the urban environment.

The Economic Impact Assessment (EIA) (attached as **Appendix M**) identifies that Queenstown continues to experience significant housing affordability and availability challenges despite sustained levels of residential development. While housing stock has increased over time, rental supply has not kept pace with population growth and demand. The Project is therefore anticipated to generate significant positive social benefits through the provision of a large supply of secure, long-term rental accommodation. Importantly, the development will provide a housing typology that is currently underrepresented within the district, with the vast majority of proposed dwellings comprising one and two-bedroom apartments that align with the projected needs of smaller households.

It is acknowledged that some existing residents have expressed concerns regarding the scale of the development and the associated transport effects. These concerns have been carefully considered throughout the design process. Detailed transport assessments and infrastructure

upgrades form part of the Project and seek to address the transportation demands generated by the development. While some localised change will inevitably occur as the area transitions from a rural environment to an urban neighbourhood, the Project is located within a planned urban growth area specifically intended to accommodate future residential development. The Project therefore represents an anticipated component of the area's long-term growth strategy.

The Applicant has considered this feedback alongside broader planning objectives, housing demand, and the need for efficient land use, and considers that the proposed development strikes an appropriate balance between these sometimes competing considerations. The key findings in respect of potential social effects are outlined below:

Critical mass for PT, commercial areas

The Project will introduce 1,085 residential units within the TPLM urban growth area, creating a significant resident population that will help support the viability of public transport services and local commercial activities. The Economic Assessment notes that increased residential density in proximity to existing and planned transport corridors strengthens the case for more frequent and comprehensive public transport services that may otherwise be difficult to sustain. The resident population generated by the Project will also support the neighbourhood retail and commercial activities proposed within the development, contributing to a more self-sufficient community and reducing the need for residents to travel longer distances for day-to-day services.

Long-term tenure

A significant social benefit of the Project is the provision of secure, long-term rental accommodation. Unlike conventional residential developments, the dwellings are intended to remain within a build-to-rent model and will not be sold individually, converted into short-term visitor accommodation, or used as holiday homes. This is anticipated to provide greater housing certainty and stability for residents. Given the existing shortage of long-term rental accommodation within the district, no adverse social effects are anticipated. Rather, the Project is expected to contribute positively to housing security and community stability.

Support for industry by providing housing

The Project will provide housing that directly supports the functioning of the local labour market. Queenstown's economy is heavily reliant on sectors such as tourism, hospitality, retail, construction, education, and healthcare, all of which require access to stable and affordable housing for workers. No adverse social effects are anticipated in this respect.

Location within planned urban growth area

The development is located within an area identified for future urban development. While some members of the surrounding community have expressed concerns regarding the scale of development and associated traffic effects, urbanisation of the TPLM corridor is anticipated through the strategic planning framework for the area. The social changes associated with increased residential development are therefore expected and consistent with the planned growth of the locality.

Future education

Although the Project itself does not provide educational infrastructure, it contributes to the critical mass required to support future investment in schools and associated services. The Applicant has engaged with the Ministry of Education regarding future schooling provision within the wider TPLM area, as discussed in Section 12 below. No adverse social effects are anticipated, and the Project may assist in facilitating positive long-term community outcomes.

Stormwater management and water quality

The Project incorporates a comprehensive stormwater management system designed to appropriately manage runoff and maintain water quality standards. The proposed mitigation measures are intended to avoid adverse effects on the receiving environment and protect environmental values that contribute to community wellbeing.

Infrastructure upgrades brought forward

The Project will deliver a range of transport and three waters infrastructure upgrades that will support not only the proposed development but also future growth within the TPLM area. The acceleration of infrastructure delivery is anticipated to provide wider community benefits and improve the capacity and resilience of existing networks.

Connectivity and accessibility

A safe and legible roading layout has been developed, supported by footpaths, shared paths, and access to public transport options, enabling greater mobility and reducing reliance on private vehicles. Enhanced connectivity and access to community infrastructure, such as existing and future reserves and trails have been provided for in the development scheme.

Construction effects

Temporary adverse social effects may arise during the construction phase, including increased traffic movements, noise, dust, vibration and temporary disruption for neighbouring residents and road users. However, these effects are characteristic of large-scale development projects and will be managed through an EMP, ESCPs, and other mitigation measures proposed as part of the development. Given the temporary duration of construction activities and the proposed management framework, adverse social effects are not considered to be more than minor.

Safety and wellbeing

The Project incorporates a range of design measures intended to promote community safety, including passive surveillance, active street frontages, lighting and clear pedestrian connections. These features are expected to support a safe and legible environment for residents and visitors.

Community resilience and climate change

The Project has been designed to support long-term resilience through the provision of secure housing, integrated transport options, communal energy production, modern infrastructure and sustainable urban form. These attributes are anticipated to support the long-term wellbeing of future residents and contribute positively to broader community resilience.

In summary, the Project is anticipated to have positive social effects by contributing to a well-functioning and resilient community. The design supports strong social outcomes and addresses potential adverse effects through thoughtful design and effective mitigation. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project

8.5 Economic Effects

An EIA (**Appendix M**) prepared by Shamubeel Eaqub accompanies this application. The EIA assesses the economic effects of the Project at the local, regional and national level and considers both the direct economic impacts of construction and operation, and the broader benefits associated with increased housing supply in the Queenstown Lakes District.

The EIA concludes that the Project will generate substantial positive economic effects during both the construction and operational phases.

During the construction period, the Project is expected to involve approximately \$461 million of privately funded development costs, and generate significant economic activity through expenditure on construction, professional services, materials and infrastructure. The EIA estimates that over the construction period the Project is expected to generate approximately \$919 million Net Present Value of economic activity nationally, with approximately \$508 million of this occurring within the Queenstown Lakes District. Construction is also expected to support substantial employment, with an average of approximately 912 full-time equivalent (FTE) positions in the district during the main construction period, alongside additional indirect and induced employment effects, and 2,309 FTE total indirect and induced employment over the development and construction period..

The Project will also provide ongoing economic benefits following completion. The EIA estimates that approximately 40 to 50 permanent FTE positions will be required for building management, maintenance and operational activities associated with the development.

A key finding of the EIA is that the provision of 1,085 build-to-rent dwellings will assist in addressing the chronic shortage of long-term rental accommodation in Queenstown Lakes, noting this is currently only growing by 228 additional rentals per annum. This increase provides tenure security in a district with annual worker turnover. The district continues to experience strong population and employment growth, high housing costs and significant workforce accommodation challenges. The Project will provide a substantial increase in rental housing supply and deliver secure, professionally managed long-term rental accommodation in a location identified for urban growth.

The EIA concludes that an increased supply of long-term rental housing is likely to deliver wider economic and social benefits through improved labour market participation, workforce attraction and retention, reduced turnover costs for employers, and improved housing outcomes for residents. In particular, the Project is expected to assist businesses that are currently constrained by difficulties securing and retaining staff due to housing affordability and availability issues.

The EIA also identifies broader benefits associated with supporting planned urban growth within the TPLM area, including improved utilisation of infrastructure investment, support for public

transport services, and the creation of a larger residential catchment to support local services and businesses.

Overall, the EIA concludes that the Project will result in significant positive economic effects at the local and regional level. The economic benefits associated with increased housing supply, construction expenditure, employment generation and support for long-term economic growth are substantial and strongly positive. Any adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.6 Structure Plan Integration

Through ongoing consultation, NZTA and QLDC have confirmed that the north–south collector road as shown on the TPLM Structure Plan is not supported as a five-leg intersection at SH6. As a result of this, the original Local Shopping Centre location per the Structure Plan is no longer suitable, as it cannot facilitate kerbside parking needed to support community-scale retail activity. The commercial area is therefore proposed at the corner of Lower Shotover Road and Road C1, where appropriate access, parking, and walking and cycling connections can be achieved for residents.

The Structure Plan also identifies an open space area at the corner of the collector roads, while allowing for flexibility in its final location. A corner is a logical place for a neighbourhood park to provide accessibility and passive surveillance. In the absence of the north-south collector Road C2, the identified location would have limited frontage and reduced interface with the public realm. For this reason, the local park is instead proposed on the northern side of Road C1, where it can achieve functional and attractive open space outcomes, including level active open space and a vegetated slope backdrop.

The overall masterplan remains largely consistent with the TPLM Structure Plan and focuses on creating a compact, walkable, and high-amenity neighbourhood with integrated open space features, strong pedestrian and cycle connectivity, and a coherent urban form. While the layout departs from some elements of the TPLM Structure Plan, these refinements are deliberately proposed to achieve a better urban outcome, improving connectivity, enhancing open space quality, and delivering higher amenity for residents. The resulting masterplan aligns closely with the objectives and policies of the TPLM Zone by achieving density, supporting a well-functioning urban environment, and providing a coherent, attractive townscape that reinforces a strong sense of place.

The assessment draws on the Strategic Urban Design Assessment (Church, Boffa Miskell) attached as **Appendix E**, the Architect's Statement (Brewer Davidson) attached as **Appendix D**, and the Landscape Effects Assessment (Boffa Miskell) (LEA) attached as **Appendix F**.

The TPLM Structure Plan establishes the spatial framework intended to guide coordinated development across the Zone, including the arrangement of collector roads, local centres, open spaces, ecological corridors, and active transport networks. The Project has been assessed against these intended outcomes, with particular attention to the effects of departures from the Structure Plan layout. The development achieves the core outcomes sought by the Structure Plan and the wider TPLM Zone, notwithstanding some differences in alignment and location of

key elements. The effects of these departures are considered acceptable and, in several respects, result in improved urban design and amenity outcomes.

A central component of the Structure Plan is the delivery of the new east-west collector Road C1 (referred to as Collector Type A in the Structure Plan). The Project fully provides this connection dissecting the northern portion of the development, establishing the primary movement spine that integrates the development with Lower Shotover Road and future development to the east. The road is designed as a high-amenity street with footpaths, street trees, on-street parking, and a shared path, supporting both transport efficiency and pedestrian use. This connection is fundamental to achieving the integrated and coordinated development pattern anticipated for the Zone, and the Structure Plan's transport movement approach.

The Project does not include the north-south collector Road C2 (referred to as Collector Type A* on the Structure Plan). This departure has been assessed by both transport and urban design experts. The expert assessments confirm that providing Road C2, along with the existing Lower Shotover Road intersection to the Stalker Roundabout may create significant adverse effects on the safe and efficient operation of SH6. Conversely, removing the Lower Shotover Road connection would divert high traffic volumes through the centre of a residential neighbourhood. This outcome would be inconsistent with the Structure Plan's intent to support mode shift, reduce reliance on private vehicles, and create high-amenity residential environments. In this context, the removal of Road C2 avoids adverse transport and amenity effects and does not undermine the integrated development outcomes sought for the Zone.

Although Road C2 is not provided, the Project maintains the Structure Plan's intended north-south legibility and visual connections to Slope Hill. Two publicly accessible shared paths are provided, including the Promenade formed around the retained liquidambar avenue. These connections are protected by easements and provide direct pedestrian and cycle links between SH6 and Road C1. Importantly, they also maintain the intended visual relationship between the development and the lower slopes of Slope Hill, achieving the Structure Plan's urban design outcome of reinforcing landscape legibility through movement corridors. The Strategic Urban Design Assessment concludes that these pedestrian-focused connections provide equal or better outcomes than a vehicular collector road in terms of amenity, safety, and landscape integration.

The Project further enhances the active transport network beyond what the Structure Plan requires. Shared paths are provided along SH6, Lower Shotover Road, Road C1, and through the centre of the Site, creating a permeable and legible movement system that supports walking and cycling. The relocation of the shared path on Road C1 to the southern side of the carriageway improves accessibility for residents and reflects updated stormwater design that no longer requires a swale in that location. These connections integrate seamlessly with adjoining development and support the modal shift sought by the TPLM Zone.

The Structure Plan anticipates a local park at the intersection of Road C1 and Road C2. Given Road C2 cannot be delivered, the Project relocates the park to the northern side of Road C1, directly opposite the Structure Plan location. This alternative site maintains an equivalent walking catchment and provides a level active recreation area along with an opportunity for a more creative and diverse recreation space. The bush-clad slope behind the park offers opportunities for play, walking, and ecological enhancement, creating a distinctive open space that aligns with the Structure Plan's intent to integrate recreation and landscape values. The

open space network is further reinforced by the Promenade, Village Green, and internal courtyards, resulting in a coherent and well-distributed system of resident communal spaces and public spaces.

As a result of the comprehensive master planned approach to this large site, the Project also relocates the Local Shopping Centre from the SH6/Stalker Road intersection to the corner of Lower Shotover Road and Road C1. This change is a direct consequence of the removal of Road C2 and the lack of kerbside parking at the Structure Plan location. The expert assessments confirm that the Structure Plan location is no longer viable for commercial activity, whereas the proposed location benefits from passing trade, provides better accessibility for residents, and integrates with the active transport network. When considered alongside the second Local Centre proposed on the adjacent Clarke Group site, the resulting distribution of centres provides improved coverage and supports walkability across the wider Structure Plan area. This outcome aligns with the Zone's intent to provide accessible day-to-day services within residential neighbourhoods.

The conclusions of the Strategic Urban Design Assessment prepared by Mr Church reinforce the view that the Project achieves the integrated, coordinated development pattern anticipated by the Structure Plan, notwithstanding the departures from its indicative layout. Mr Church supports that the Project delivers equal or better urban design outcomes than strict adherence to the Structure Plan, particularly in relation to movement networks, active transport permeability, landscape legibility, and neighbourhood amenity. Mr Church concludes that the alternative arrangement of connections, open space, and the Local Centre maintains the intended structure of the Zone and results in a well-functioning, high-quality urban neighbourhood.

Overall, taking into account the assessment provided by Mr Church, the Project achieves the integrated, efficient, and coordinated development pattern sought by the Structure Plan and the TPLM Zone. The departures from the Structure Plan layout have been technically assessed by experts, and do not undermine the wider TPLM Zone. The departures do not result in adverse effects and in several respects result in improved outcomes for residents and the wider community. The development delivers the key structural elements required to support a well-functioning neighbourhood, including the east-west collector Road C1, a coherent open space network, strong active transport connections, and accessible local retail. The effects of the Project on Structure Plan integration are therefore assessed as acceptable, with low adverse effects and several positive effects relating to transport efficiency, landscape legibility, and neighbourhood amenity.

Overall, it is considered that the adverse effects will be acceptable and they will not be out of proportion to the significant regional benefits of the Project.

8.7 Landscape Visual Effects

The landscape and visual effects of the Project have been assessed with reference to the existing landscape context, the anticipated urbanisation of the TPLM Zone, and the specific height exceedances proposed. The LEA prepared by Boffa Miskell (**Appendix F**) provides a detailed evaluation of both landscape and visual effects, including the relationship of the Project to the Slope Hill ONF. Drawing on the LEA, and considering the outcomes sought for the Medium Density Residential Precinct, the Project results in low adverse landscape and visual effects.

The height exceedances are appropriately integrated and do not undermine the landscape values of the locality.

The existing landscape context is one of a flat terrace landform framed by prominent mountain ranges and the distinctive form of Slope Hill. The broader landscape context is strongly influenced by the surrounding natural features of the Wakatipu Basin. The Shotover River is located to the west of the Site, while long-range views are available toward the Remarkables mountain range to the south. Coronet Peak is located to the north. These features contribute to the wider landscape character and sense of place of the surrounding area.

While the residential development area currently exhibits a pastoral character, this character is not intended to be retained. The TPLM Zone anticipates a significant change to the landscape, with medium and high-density urban development forming a built, urban neighbourhood north of SH6. In this context, the Project represents the type of urbanisation expressly contemplated by the planning framework. The landscape effects must therefore be understood not as a departure from an expected rural baseline, but as a transition to the urban form anticipated for this part of the TPLM.

The Project includes forty residential buildings, the majority of which comply with the 13-metre height standard. Six residential buildings and two parking buildings exceed this height. The LEA confirms that these taller elements have been deliberately placed, oriented, and stepped to reduce their perceived scale and to integrate them within the wider development pattern. Along the SH6 frontage, the Project presents predominantly three-storey walk-up buildings, with the taller buildings expressed only as narrow, stepped end elevations. This arrangement ensures that the immediate interface with SH6 remains consistent with the anticipated medium-density character, while the height variation is experienced as a secondary, recessive element within the overall composition.

The taller buildings located further within the residential development are oriented north–south, which reduces their apparent width when viewed from public roads and maintains a rhythm of built form that aligns with the urban form. Their placement away from the SH6 frontage, combined with the screening effect of the compliant foreground buildings, ensures that the height exceedances do not dominate public views. The landscape simulations demonstrate that in most viewpoints, the taller buildings are partially or largely obscured by the lower buildings, and where visible, their stepped forms and modulation reduce their visual prominence.

A key consideration is the relationship between the Project and the Slope Hill ONF. The LEA is clear that the Project does not compromise the ability to perceive or appreciate the ONF. The skyline and landform of Slope Hill remain legible in all relevant public views, and the Project sits comfortably within the foreground as part of the anticipated urbanisation of TPLM. The taller buildings do not intrude into the skyline of Slope Hill, nor do they erode its dominance within the wider landscape. The Project maintains the ONF's role as a defining natural feature and preserves the landscape values associated with its physical, associative, and perceptual attributes.

The Project also incorporates a strong landscape framework that assists in integrating the built form into the wider environment. The retention and enhancement of the liquidambar avenue, the provision of specimen trees along SH6 and Lower Shotover Road, and the establishment of landscaped courtyards and communal open spaces all contribute to a visually moderated

development. The ethos of incorporating taller buildings, is the resulting ability to maximise landscaped permeable areas. The LEA outlines that this planting is not intended to screen the Project, but rather to provide scale, seasonal interest, and a coherent interface with the public realm. This approach aligns with the outcomes sought for the Medium Density Residential Precinct, which emphasise high-quality landscape amenity and integration of indigenous biodiversity.

In terms of visual effects, the Project's height exceedances result in effects ranging from neutral to low adverse for public viewing audiences, and very low to low adverse for private/onsite viewing audiences. These effects reflect the careful placement, stepping, and modulation of the taller buildings, as well as the presence of compliant buildings in the foreground. The Project does not create visual dominance, when considering the level of built form anticipated by the TPLM Zone, nor does it generate adverse effects on the character or amenity of the surrounding locality. Instead, it contributes to the emerging urban character anticipated for the Zone, with height variation used as a positive design tool to create interest and legibility within the built form.

The LEA concludes that the Project results in low adverse landscape effects and neutral to low adverse visual effects, including in relation to the height exceedances. The assessment confirms that the taller buildings are appropriately placed, stepped, and modulated to avoid visual dominance, and that the skyline and landform of Slope Hill remain clearly legible in all relevant views. They also conclude that the Project sits comfortably within the emerging urban context anticipated for the Zone and that the landscape framework further assists in integrating the built form. Their conclusions provide a robust evidential basis for determining that the landscape and visual effects of the Project, including those arising from height, are acceptable.

Overall, in reliance on the expert assessments, it is considered the Project achieves the landscape and visual outcomes sought for the TPLM Zone. It delivers a built, urban character consistent with the intended medium-density neighbourhood, maintains the legibility of key landscape features such as Slope Hill, and integrates height variation in a manner that avoids adverse dominance or visual intrusion. The height exceedances are well-managed and result in low adverse landscape and visual effects. The Project represents an appropriate and well-designed urban response to the landscape context, and the effects associated with height are acceptable. In this regard, the adverse effects are considered appropriate and will not be out of proportion to the significant regional benefits of the Project.

8.8 Urban Design Effects

The urban design effects of the Project have been assessed with reference to the intended built form, density, street network, public realm, and neighbourhood amenity outcomes sought for the TPLM Zone. The Strategic Urban Design Assessment prepared by Mr Church and the Architect's Statement prepared by Mr Brewer provide a comprehensive evaluation of the Project's urban design performance. Drawing on those assessments, and considering the planning framework's clear expectation for a built, urban neighbourhood north of SH6, it is considered the Project achieves high-quality urban design outcomes and results in acceptable, and in many respects positive, urban design effects.

The Project adopts a perimeter-block structure with clearly defined streets, internal courtyards, and a legible movement network. This approach is consistent with the TPLM Zone's emphasis

on creating well-connected, pedestrian-friendly environments. The private streets within the Project are designed with footpaths, street trees, indented parking, and raised pedestrian crossings, creating a coherent townscape rather than a car-dominated housing estate. This street structure supports passive surveillance, walkability, and neighbourhood identity, and provides a strong foundation for a well-functioning urban environment.

The Project incorporates a high level of permeability through a network of shared paths and pedestrian connections. The Promenade, formed around the retained liquidambar avenue, provides a distinctive north–south axis that anchors the neighbourhood and reinforces visual connections to Slope Hill. Additional shared paths along SH6, Lower Shotover Road, Road C1, and through the centre of the development ensure that residents and visitors can move easily through the neighbourhood and connect to adjoining development. These connections exceed the minimum expectations of the Structure Plan and support the modal shift sought for the Zone by prioritising walking and cycling over private vehicle use.

The Project delivers a coherent and well-distributed open space network. The Village Green, internal courtyards, communal pavilions, and the relocated public neighbourhood park collectively provide a range of recreational opportunities and social spaces. These spaces are integrated into the street network and benefit from strong passive surveillance, contributing to safety and community cohesion. The retention of the liquidambar avenue and the establishment of landscaped courtyards reinforce the Project's identity and provide visual relief within the built environment. The landscape framework is carefully designed to complement the built form and enhance amenity without attempting to screen the development, which is appropriate given the urban character anticipated for the Zone.

A key aspect of the Project's urban design is the deliberate use of height variation. While the majority of buildings are three-storey walk-ups, the inclusion of five to eight storey apartment buildings introduces vertical modulation and contributes to a more varied and interesting roofscape. The taller buildings are strategically located to reinforce key movement corridors, define larger open spaces, and avoid adverse building dominance. Their placement along the Promenade and around the Village Green ensures that the highest density is located where the highest amenity is available. The expert assessments confirms that this height variation improves urban design outcomes and does not result in adverse visual or amenity effects.

Although the Project may be viewed as exceeding what may traditionally be understood as “medium density” within the Queenstown context, this does not represent a departure from the planning framework. The TPLM Zone anticipates a built, urban neighbourhood with densities higher than suburban and expressly prioritises maximising housing provision. In this context, the Project's scale and form are consistent with the intended outcomes for the Zone. The height variation and intensity are used to achieve high-quality urban design by enabling a much larger percentage of landscaped permeable areas, rather than to introduce adverse effects, and the resulting neighbourhood is one of a high amenity, legible, and well-connected space.

The Project integrates communal facilities and shared amenities for residents that support social interaction and contribute to neighbourhood identity. The communal pavilions, rooftop shared spaces, and barbecue pergolas provide opportunities for residents to meet, work, and relax outside their apartments. These facilities are distributed across the development to ensure accessibility and reinforce the sense of community within each block. The build-to-rent model

further supports long-term stewardship of the neighbourhood, ensuring that the quality of the built environment and communal spaces is maintained over time.

Overall, the Project achieves the high-quality urban design outcomes sought for the TPLM Zone. It delivers a coherent street network, strong pedestrian connectivity, open space, and a varied and well-modulated built form. The urban design effects are positive, and the Project represents an appropriate and well-considered urban response to the planning framework and the emerging context of the TPLM. Any potential adverse effects relating to urban design effects will therefore not be out of proportion to the significant regional benefits of the Project.

8.9 Open space, public access and alignment with QLDC Parks and Open Spaces Strategy

The Project proposes a vested Local Park to the north of Road C1. Public easements for pedestrian and cycle access extend north-south through the centre and along the eastern boundary of the residential development, connecting Road C1 to the SH6. A public pedestrian and cycle connection is further provided in an east-west configuration connecting the Promenade to the neighbouring development to the east.

The open space provision within the Project site will be retained in private ownership for use by residents.

Concerns have been raised by QLDC previously in relation to the private aspect of the open space areas internal to the development. In order to address this potential effect of 'lack of public open space' it must be assessed against both the TPLM Zone planning framework and QLDC's Parks and Open Spaces Strategy 2021.

The QLDC's Parks and Open Spaces Strategy emphasises that "a quality open space network should provide the community with access to a range of recreational, cultural, social and environmental experiences," and that in new and high-growth areas the focus is on "ensuring enough quality local parks, community parks and sportsground parks are provided."

The Project achieves this in two ways. First, it creates an internally rich open space environment for its residents: the Promenade, Village Green, multiple internal courtyards with pavilions and BBQ pergolas, and rooftop communal spaces. These spaces function collectively as pocket parks and local parks at the neighbourhood scale, providing "play opportunities, flat kick-around space, areas for respite and relaxation" and places for socialising and informal recreation. For a development of over 1,000 units, this level of internal provision is not only adequate but generous, and it supports the QLDC Strategy's objective that "open spaces are well designed, accessible and valued" for the resident community.

Second, the Project contributes to the wider public network through:

- public access easements over three key north-south and east-west shared paths, connecting SH6, Lower Shotover Road, Road C1 and Spence Road (see Sheet SK82 in the Architectural Drawing set attached as **Appendix C**); and
- potential vesting of the open space north of Road C1 as a local park, with a level active area and bush-clad slope suitable for play, walking and informal recreation.

These elements directly support the Strategy's emphasis on active travel routes, neighbourhood parks and "well-designed neighbourhoods that provide for everyday needs" under the Spatial Plan. They also sit within a broader TPLM Structure Plan framework that requires a large community park further east and where the neighbouring developer is also vesting a local park. In cumulative terms, the corridor will have a sequence of public parks and trails serving the wider community, not just residents.

The critical question is whether the predominance of private open space within the development creates a problem for the district's open space network. At the scale of the development itself, the internal open spaces are proportionate to the density, well-distributed, and clearly designed to function as the primary amenity for residents. They are not "missing" public parks; they are deliberately private, high-quality spaces in a build-to-rent neighbourhood. That is consistent with the Strategy's recognition that open space can be delivered through a mix of public and private provision, provided residents have access to a range of experiences.

At the wider TPLM scale, the key issue is public accessibility. Here, the park north of Road C1, the public easements over shared paths, and the additional community and local parks to the east mean that non-residents will have multiple options for local and community park experiences. The SLL internal courtyards and Village Green are not available to the general public, but they do not need to be, provided the structure plan's public open space requirements are met elsewhere and the vested park is designed and developed to a high standard.

It is recognised that the large, visually prominent open space network within the development will be perceived as "closed" to the wider community. However, this is more a perception and equity issue than a quantitative shortfall. To minimise this, the design and management of the Promenade and Village Green edges emphasise visual openness, and clear wayfinding to public routes, legalised by the easements proposed. Doing so would help ensure the development supports, rather than undermines, the QLDC Strategy's goals around social connection and shared use of open space.

A further matter raised in relation to the Project is whether the density proposed creates a corresponding obligation to provide additional open space beyond what the Structure Plan identifies. It is correct that higher residential density increases demand for accessible, high-quality open space, and it is recognised the development should not place additional strain on the district's public reserve network.

In terms of open space quantity, the Project significantly exceeds the minimum landscaped permeable surface requirement, providing 35% of the residential development as permeable landscaping against a 25% minimum, and keeping building coverage to 34% against a 45% maximum. If the QLDC Development Contribution Policy open space benchmark of 17.5 m² per lot is applied to the 1,085 units, a notional requirement of about 1.9ha of open space arises. While exact site area figures are not provided in the Brewer Architect's Statement, a 35% landscaped proportion on a site of this scale, plus the vested park north of Road C1, is highly likely to meet or exceed that benchmark. The Development Contribution metric as an indicative check only, but goes some way to support the conclusion that the development is broadly self-sufficient in open space and is not relying on QLDC's wider network to absorb the effects of its higher density.

In this context, the Project's approach is deliberate: rather than relying on QLDC's wider open space network to absorb the recreational and amenity needs of more than 1,000 units, the development provides a substantial internal open space system - Promenade, Village Green, multiple courtyards, pavilions, rooftop communal areas -designed to function as the primary recreational and social environment for its residents. These spaces are not public, but they are proportionate to the scale of the development and materially reduce the demand that would otherwise fall on QLDC's public parks. In effect, the Project internalises the open space burden generated by its higher density, rather than exporting it to the wider community.

At the same time, the Project proposes to contribute meaningfully to the public open space network through the vesting of the local park north of Road C1 and through public access easements over the key pedestrian and cycle routes that traverse the residential development. These elements ensure that the development does not become an isolated enclave and that it supports the wider TPLM movement network and public realm. Importantly, the Structure Plan already requires a large community park further east, and the neighbouring developer is vesting an additional local park. When viewed cumulatively, the corridor will contain a sequence of publicly accessible parks and trails serving the broader TPLM community. In that context, the fact that the SLL internal open spaces are private does not create a deficit in the public network, nor does it undermine the Parks and Open Spaces Strategy's objectives. Rather, the Project provides more than adequate open space for its own residents while still contributing to the public network at the scale anticipated by the Structure Plan. The higher density therefore does not generate an unmet demand for additional public reserves, and the effects on the wider open space network are assessed as acceptable and will not be out of proportion to the significant regional benefits of the Project.

8.10 Landscape Design and Internal Landscape Effects

The landscape design for the Project has been developed as an integral component of the overall masterplanning approach, and it plays a significant role in achieving the high-amenity, well-connected, and distinctive neighbourhood anticipated for the TPLM Zone. The Greenwood Associates landscape package demonstrates a comprehensive and contextually grounded design response that supports both the built form and the wider urban design outcomes. It is considered, the landscape design contributes positively to neighbourhood character, amenity, ecological values, and the overall functioning of the Project, and it results in positive landscape effects within the residential development.

The landscape vision for the Project is centred on creating a thriving residential community with a strong sense of place. The design responds directly to the evolving urban form of the TPLM corridor, balancing residential intensification with generous and well-distributed amenity spaces. The landscape package emphasises a "people-first" approach, ensuring that residents have access to a range of active and passive recreation opportunities, social spaces, and visually engaging environments. This aligns with the planning framework's expectation that medium-density neighbourhoods north of SH6 will be built, urban environments supported by high-quality landscape and open space outcomes.

A feature of the Project's landscape design is the retention and enhancement of the existing liquidambar avenue, which forms the central north-south Promenade. This element anchors the identity of the neighbourhood, provides a distinctive landscape feature, and frames views toward the surrounding mountain ranges. The Promenade is designed as a publicly accessible shared

path, supported by landscape mounding, meadow planting, schist paving, and seating areas. It functions as both a movement corridor and a focal point, reinforcing legibility and contributing to the Project's sense of place.

The taller buildings are grouped around central open spaces. The landscape design absorbs building height within the centre of the residential development by surrounding these taller elements with generous communal spaces, including the Village Green and multiple courtyard landscapes. This approach ensures that height is balanced by amenity, and that the internal landscape structure supports the built form rather than competing with it. The Village Green, located adjacent to Road C1, provides a large, flexible lawn area, event space, and a pavilion building, framed by existing liquidamber trees and new planting. It is designed to function as a central gathering space for residents and visitors, with strong passive surveillance and excellent sunlight access.

Across the Project, the courtyard landscapes are designed to reflect a Central Otago identity, incorporating alpine grasses, meadow planting, rockery mixes, tussock themes, and robust feature species. These planting palettes are carefully curated to provide seasonal variation, durability, and long-term manageability. The use of indigenous species, including beech, tussock, and native shrubs, supports ecological values and aligns with the TPLM Zone's emphasis on incorporating indigenous biodiversity. Deciduous exotics are used strategically to provide seasonal interest, shade, and visual softening of the built form. The result is a landscape that is contextually appropriate, contributing to the Project's character and amenity.

The Project includes four primary pavilion buildings and multiple pergola structures distributed throughout the residential development. These elements provide focal points for social interaction, co-working, relaxation, and recreation. Each pavilion is integrated into its surrounding landscape through planting, seating, gravel paths, schist paving, and timber elements. The landscape package demonstrates careful attention to design, ensuring that each courtyard and open space has a distinct identity while contributing to the overall cohesion of the neighbourhood. Additional specimen trees, courtyard planting and embankment planting will build on this established framework by introducing layered vegetation at different scales, from larger canopy trees through to lower-level planting around buildings and communal areas. Over time, this planting will help moderate the visual presence of the apartment buildings, improve the quality of internal outlooks, and create a more settled landscape setting as the development matures.

The landscape design also plays a critical role in mitigating the perceived scale of the built form. Along SH6, large-growing native beech species and landscape mounding provide immediate visual impact and help break down the scale of the development when viewed from the highway. This treatment enhances the streetscape experience and contributes to the Project's integration with the wider landscape context. This planting is not intended to screen the development, which is appropriate given the urban character anticipated for the Zone, but rather to provide proportional scale, soften edges, and reinforce the gateway experience along SH6.

The Project's internal landscape design supports Crime Prevention Through Environmental Design (CPTED) principles through clear sightlines, passive surveillance, lighting integration, and the avoidance of concealed spaces. The distribution of open spaces, pathways, and seating areas ensures that residents can move safely and comfortably throughout the development. The landscape design also supports positive environmental outcomes by maximising permeable

surfaces, integrating planting with stormwater management, and ensuring sunlight access to key communal spaces.

Overall, the landscape design achieves the high-quality amenity, ecological integration, and neighbourhood character outcomes sought for the TPLM Zone. It reinforces the Project's urban design structure, mitigates the effects of height and intensity, and provides a diverse and engaging environment for residents. The internal landscape effects are positive, and the Project represents a well-considered and contextually grounded landscape response that enhances the overall quality of the development. The adverse effects are therefore acceptable and will not be out of proportion to the significant regional benefits of the Project.

8.11 Built Form Effects

Height

The built form of the Project is shaped by the Medium Density Residential Precinct standards, which anticipate a built, urban neighbourhood with multi-storey apartment buildings and a coherent street network. Most of the residential development area is subject to a 13 metre height limit, (noting the height allowance in the Local Centre Zone is 10 metres) and the Project complies with this 13 metre limit for the majority of buildings. Thirty-four of the forty apartment buildings are three-storey walk-ups ranging between 9.5m to 12m in height, and these buildings establish the primary built form character along internal streets and public edges.

The Project does not comply with the height limit for six apartment buildings and the roof structures, containing solar panels, of the two parking garages. These taller buildings range between five and eight storeys, with maximum heights of 18.2 to 27.4 metres. The effects of these height exceedances have been assessed above in relation to landscape visual effects, and effects on the Slope Hill ONF. The taller buildings are deliberately placed perpendicular to SH6 and Road C1, which significantly reduces their perceived width and bulk when viewed from public roads. In most public views, the compliant walk-up buildings in the foreground screen the taller elements, meaning the height infringements are experienced only in filtered or partial views. The stepped massing of the taller buildings further reduces their apparent scale, and the grouping of these buildings around the Promenade and Village Green ensures that height is concentrated where amenity is highest. The LEA confirms that views to Slope Hill remain legible and that the skyline is not compromised. As a result, the height non-compliances generate only low adverse visual effects and do not undermine the built form outcomes anticipated for the Zone.

The parking garages also infringe the height limit due to the inclusion of solar panel roofs. These structures are centrally located within the residential development and are therefore largely screened from public view, including from SH6 or Lower Shotover Road. Their height exceedance therefore has minimal discernible effect on public views or wider neighbourhood character. Whilst the solar panels could be removed to achieve a largely compliant height, the benefits they offer to the functioning of the Project markedly outweigh the less than minor adverse effect of the increased height. Overall, while the Project includes height infringements, the placement, orientation, and modulation of the taller buildings ensure that the effects are acceptable and consistent with the urban character anticipated for the TPLM Zone.

The shading analysis included within the Architectural Drawings set (**Appendix C**) as Sheets SK72 to SK81 demonstrates that equinox shading effects fall well within what would be anticipated from a fully compliant 13-metre height envelope. Mid-winter shading from height-infringing elements extends over SH6 and marginally beyond the Building Restriction Area (BRA) for limited periods in the late afternoon. These effects are short-duration (no more than 1 hour prior to sunset), and occur at the least sensitive time of year. The shading effects are therefore acceptable and do not compromise residential amenity or public realm quality and will not be out of proportion with the significant regional benefits of the Project.

Building Length

The Medium Density Residential Precinct includes a maximum building length standard of 26 metres, intended to avoid long, unbroken façades that can create visual monotony and reduce amenity.

The Project includes several buildings that exceed the maximum permitted building length for the Medium Density Residential Precinct. While the infringement results in longer built forms than anticipated by the standard, the expert assessments confirm that these buildings do not present as long, uninterrupted or visually dominant structures. The Brewer Architect's Statement explains that the buildings have been deliberately and consistently broken down through strong modulation, changes in materiality, recesses, projections, and varied roof forms. This approach creates a fine-grained rhythm along the street edge and ensures that the buildings read as a series of smaller components rather than a single continuous mass. As a result, the perceived scale of the buildings is significantly reduced, and the additional length does not translate into adverse built form effects.

The LEA reinforces this conclusion. Although the LEA focuses primarily on height, its findings are directly relevant to building length because the same design strategies - stepping, modulation, and careful placement - are used to reduce apparent bulk. The assessment notes that the buildings have been carefully placed to limit their presence and apparent scale in the landscape, and that high levels of variation reduce the perception of mass. This confirms that the longer buildings do not appear monolithic or visually overbearing, even when viewed from public vantage points such as SH6. Instead, they contribute to a coherent urban form that aligns with the intended character of the Medium Density Precinct, which anticipates a built, urban environment with multi-storey typologies and higher-density block structures.

The longer buildings also support a strong and well-defined street interface. The urban design statement highlights that frequent entrances, active ground-floor frontages, and windows overlooking streets and open spaces ensure that the buildings contribute positively to pedestrian experience, neighbourhood amenity and supports CPTED outcomes. In this context, the additional building length enhances the sense of enclosure and legibility along internal streets, reinforcing the intended urban block pattern. This is an expected and desirable characteristic of medium-density neighbourhoods, where longer buildings help establish coherent street edges and improve walkability.

In terms of amenity, the building length infringement does not result in adverse privacy, daylight, or outlook effects. The Brewer Architect's Statement confirms that privacy is maintained through window offsetting, screening, and appropriate separation distances. Daylight and outlook are preserved through the placement of courtyards, the width of internal streets, and the stepping

of building forms. The Strategic Urban Design Assessment also notes that the Project maintains reasonable internal and external amenity outcomes despite the increased intensity. Noise and lighting effects are typical of medium-density residential environments and are not exacerbated by the additional building length. The Project continues to provide a high level of residential amenity for occupants and neighbours.

Overall, the building length infringement results in no more than minor adverse effects on built form, character, or amenity. The longer buildings are visually broken down, well-modulated, and integrated with high-quality street and landscape design. They align with the intended urban character north of SH6 and support the density, housing choice, and urban design outcomes sought for the Medium Density Precinct. The expert assessments demonstrate that the infringement is acceptable and that the resulting built form is consistent with the anticipated development pattern for this part of the Zone.

Building Separation and Outlook Effects

The Project complies with the building separation standard, and the distances between buildings ensure adequate privacy, daylight access, and outlook. Recession plane and setback standards are met prior to subdivision, meaning the built form does not generate dominance or shading effects on neighbouring sites. While the proposed subdivision will create internal lot boundaries that result in technical infringements of certain setback and recession plane standards, these boundaries are internal to land that will remain under the ownership and control of Simplicity. As such, the resulting breaches are largely administrative in nature and do not give rise to the adverse effects that the standards are intended to manage. There are two minor infringements to the outlook standard at Building 30, where the Village Green pavilion encroaches into the required 12-metre outlook area by 2.65 metres. The effect of this encroachment is negligible. The outlook remains to a high-amenity open space, and the pavilion is low-scale and visually permeable. The encroachment does not materially reduce residential amenity, nor does it compromise the function of the outlook area. Overall, the Project achieves the intent of the outlook, separation, and recession plane standards, and the minor non-compliances do not generate unacceptable adverse effects that are out of proportion with the significant regional benefits of the Project.

Outdoor Living Space, Balconies, and Internal Storage

The Project includes several non-compliances relating to private outdoor living space and balcony dimensions. Ground-floor apartments provide private open spaces of approximately 15.48 square metres, which is below the 20 square metre minimum required by the precinct. The effect of this shortfall is mitigated by the Project's extensive communal open space network, including the Village Green, Promenade, internal courtyards, and rooftop communal areas. These spaces provide high-quality outdoor environments that exceed what is typically available in medium-density developments. The build-to-rent model also reduces the functional need for larger private outdoor spaces, as SLL maintains landscaping and provides shared amenity areas. As a result, the reduced private outdoor living areas do not materially diminish residential amenity.

Balcony sizes for upper-level apartments do not comply with the minimum dimensions required by the PDP. Typical balconies are 3.4 square metres, compared to the required 8 - 10 square metres. These balcony sizes are consistent with consented SLL projects in Auckland, where

similar rules have been interpreted flexibly in light of extensive communal amenity. Each block has a shared courtyard, there is a Village Green, central pavilion and rooftop communal space, and the development is immediately adjacent to a vested local park north of Road C1. In that context, the smaller private spaces are offset by abundant shared amenity. The effect is a shift from individual outdoor living to collective, high-quality communal environments, which is appropriate for a higher-density neighbourhood. Given the high level of shared amenity, it is considered the balcony non-compliances do not result in unacceptable adverse effects.

Storage for two-bedroom units also falls below the required 3 cubic metres, but additional storage is available within the parking garages, and the larger living areas can accommodate freestanding storage furniture, as desired by residents. Overall, the internal amenity effects associated with these non-compliances are minor and acceptable within the context of a comprehensively designed build-to-rent neighbourhood and are not out of proportion with the significant regional benefits of the Project.

Density, Character and Neighbourhood Amenity

The Project meets and significantly exceeds the minimum residential density standard (123 units/ha versus 40 units/ha) but remains well within coverage and landscaping limits, with 34% site coverage (max 45%) and 35% landscaped permeable surface (min 25%). This combination of higher density and generous landscaping means the intensity is expressed vertically rather than through continuous hardstand, and the development will feel greener and more open than conventional terraced housing development. It is considered the density is supported by the quality of built form, the strong landscape framework and the provision of multiple communal spaces, such that the overall character aligns with the TPLM Zone purpose of “a very built, urban character” at medium or higher density.

In terms of character, the Project delivers a built, urban neighbourhood consistent with the Zone’s purpose. Height variation, articulated building forms, and recessive materials ensure that the development avoids monolithic massing and presents a visually rich and coherent townscape. The perimeter block structure, private streets, and extensive landscaping contribute to a high-amenity environment that supports walkability, social interaction, and neighbourhood identity. The minor built form non-compliances do not detract from this character; rather, the overall design achieves the outcomes sought by the planning framework.

Neighbourhood amenity is enhanced by the Project’s open space network, communal facilities, and active transport connections. The Promenade, Village Green, and internal courtyards provide a range of recreational and social spaces that support resident wellbeing. The build-to-rent model ensures long-term stewardship of these spaces, maintaining amenity over time.

Overall, the Project achieves a high level of residential and neighbourhood amenity, and the effects of the built form non-compliances are assessed as acceptable within the context of the TPLM Zone. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects of the built form and they will not be out of proportion to the significant regional benefits of the Project.

8.12 Residential Amenity Effects

The landscape design will provide a high level of internal amenity for future residents. The development incorporates a network of open spaces that provide for a range of recreational, social and passive amenity needs. These include community pavilions, pergolas, BBQ areas, playgrounds, natural play spaces, orchards, lawns, picnic areas, gravel pathways and seating spaces.

The distribution of these spaces throughout the residential development means that residents will have access to communal amenity areas within close proximity to their dwellings. The provision of a variety of spaces will support different user groups, including children, families, older residents and people seeking quieter passive recreation areas.

The landscape package places particular emphasis on pedestrian and cycling priority. The central pedestrian spines and meandering pathway networks will support safe and convenient movement through the development and will provide connections between residential buildings, communal spaces and adjoining transport networks. This will contribute to a walkable environment and reduce the dominance of vehicles within the internal public realm.

The integration of car parking within parking garages is also positive from an amenity perspective, as it reduces the extent of surface parking and allows more space to be dedicated to planting, open space and recreation. This will improve the lived experience of residents and contribute to a more attractive and people-focused environment.

The proposed tree planting and landscape treatment will also provide privacy, shading, seasonal interest and visual relief from built form. Over time, the establishment of native and exotic tree species will further enhance amenity and contribute to a more comfortable and attractive residential environment.

Overall, the internal amenity effects of the Project are considered to be positive. In this regard, they will not be out of proportion to the significant regional benefits of the Project.

8.13 Ecological Effects

The potential ecological effects largely relate to the construction of the public water supply pipeline within DOC-administered marginal strip land adjoining the Shotover River. The ecological effects relating to the indigenous lizards and habitat are addressed and assessed in Section 10.10 of this application, which supports the Wildlife Approval sought under section 42(4)(h) of the FTAA. Relying on the more detailed assessment in Section 10.10, effects on indigenous lizards and lizard habitat are expected to be appropriately avoided, minimised or mitigated through implementation of a Lizard Management Plan (LMP).

The existing ecological values of the residential development area are limited. 12 Lower Shotover Road has historically been used for rural and pastoral activities and is currently dominated by pasture grasses, with scattered shrubs, shelterbelts, exotic trees, and an established avenue of liquidambar trees along the existing internal accessway. There are no waterways, wetlands, lakes or other waterbodies within the Site, and no Significant Natural Areas are identified. Accordingly, the development area does not contain sensitive terrestrial or freshwater ecological features that would constrain urban development.

The proposed development will retain and integrate the existing liquidambar avenue where practicable as a defining landscape feature. Beyond this, the development will introduce a substantially more diverse and structured planting framework than what exists on the development area currently. A mix of native and exotic species has been selected to provide visual interest, seasonal variation, durability and long-term manageability. Planting themes, including meadow, rockery and tussock areas, reflect the surrounding Central Otago landscape character while creating a more diverse and functional environment than the existing pasture-dominated landscape.

The planting strategy will also enhance biodiversity values over time. Indigenous species, including rimu, red beech, mountain beech, mountain lacebark and ribbonwood, will reintroduce native vegetation to the development area and contribute to increased canopy cover, vegetation diversity and habitat opportunities. As the planting matures, it will provide improved vegetation structure, shade, shelter, seasonal food sources, and foraging and refuge opportunities for common urban bird and invertebrate species. Orchard planting and fruit trees will further support pollinators, contribute to the village character of the development, and add to the overall diversity and resilience of the urban environment.

The landscape design will also improve ecological connectivity throughout the residential development area. The retained tree avenue, central pedestrian spine, street trees, pocket parks, local park, internal courtyards and other planted open spaces will form an interconnected network of vegetated areas. Collectively, these features will soften the urban form, facilitate the movement of common urban fauna, and enhance the ecological function of the developed landscape.

Within the main TPLM development area, there are no permanent streams, wetlands, or natural waterbodies, and therefore no on-site freshwater ecosystems that could be directly affected by stormwater discharges. The nearest major receiving environments are the Shotover River to the west and Lake Hayes to the east. For the core development area, both are separated by intervening rural landholdings and roading infrastructure, and the Master Plan technical assessments that informed the TPLM Zone confirm that no surface water features or riparian habitats exist within the developable terrace.

The situation is different for the proposed works within the Kawarau River Marginal Strip, which are located in closer proximity to the Shotover River. The Lizard Habitat Assessments (LHA) and related Master Plan ecology work identify that only a narrow portion of the Marginal Strip is affected, and that this area contains no waterbodies, no riparian margins, and no indigenous freshwater habitat, with vegetation dominated by exotic species and overall ecological values being low. While these works are nearer to the Shotover River than the main development area, they still occur on elevated ground without direct stormwater discharge points to the river, and there are no identified aquatic habitats within the footprint of the marginal strip works themselves.

Operational stormwater from both the main development area and the marginal strip works will be managed through land-based treatment, attenuation, and infiltration systems consistent with the TPLM Zone requirements. These systems ensure stormwater is treated prior to discharge or soakage, reducing contaminants and supporting natural hydrological processes. The Zone's integrated green infrastructure framework anticipates that stormwater areas will function as ecological corridors, and the Project's design aligns with this approach.

Given the absence of any on-site waterbodies or freshwater ecosystems within the main development area, the limited extent, low ecological value, and lack of aquatic features within the portion of the Kawarau River Marginal Strip affected by the Project, the absence of any direct stormwater discharge pathways to the Shotover River from the works, and the incorporation of stormwater treatment and attenuation systems that meet the performance expectations of the TPLM Zone, the Project does not create a credible pathway for adverse ecological effects on downstream water quality or aquatic biodiversity.

Given the absence of on-site waterbodies, the lack of ecological constraints, and the robust management measures proposed, adverse effects arising from the development in relation to water quality, ecosystem services, or biodiversity values, will be less than minor. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.14 Geotechnical Effects

A technical assessment of ground conditions has been undertaken by ENGEO (**Appendix N**). This assessment provides a detailed understanding of the geological and geotechnical characteristics of the proposed residential development area, and is summarised as follows.

- (a) The area is underlain by a predictable sequence of topsoil, loess, and dense alluvial/glaciofluvial sands and gravels, with no shallow groundwater encountered. ENGEO notes that “groundwater was not encountered within ENGEO nor historical geotechnical site investigations... ORC well data... indicates regional groundwater levels between 39–51 m depth”. This means earthworks and foundations will not interact with groundwater, avoiding associated environmental risks such as dewatering, sediment-laden discharges, or instability.
- (b) Earthworks are relatively modest, with cuts up to ~2.4 m and fills up to ~4.1 m. The Geotechnical Report confirms that slope instability is not a significant hazard, given the residential development area is relatively flat and that proposed cut slopes are low-risk when constructed at shallow angles. Environmental effects from earthworks are therefore expected to be low, provided standard erosion, sediment, and dust controls are implemented.
- (c) The alluvial soils are generally suitable for reuse as engineered fill, supporting a balanced cut-and-fill approach. ENGEO identifies “material suitability for reuse as fill” as a key consideration but confirms that alluvium is appropriate when compacted to NZS 4431 standards. This reduces the need for importing or exporting material, lowering truck movements and associated environmental effects.
- (d) Liquefaction is not considered a risk due to deep groundwater. No active faults cross the development area, and seismic effects are limited to ground shaking, which is addressed through standard structural design. Overall, residual environmental risk from natural hazards is low.
- (e) The area is suitable for shallow foundations bearing on loess or alluvium. ENGEO provides bearing capacities and notes that “the site is suitable for shallow strip and pad foundations”. This avoids the need for deep piles, reducing construction noise, vibration, and spoil generation.

Taken together, the geotechnical characteristics of the area and the recommended construction methodologies ensure the proposed earthworks will not give rise to land instability or related environmental effects. The ground conditions are inherently favourable, the scale of cuts and fills is modest, and the works will be undertaken in accordance with established engineering standards and the detailed recommendations of ENGEO and the EMP. With further site-specific confirmation at the detailed design stage, and with standard erosion, sediment, and construction management controls in place, the risk of instability, off-site effects, or adverse interactions with groundwater is very low. To ensure the recommendations of the ENGEO Geotechnical Report are incorporated into the delivery of the Project, the relevant recommendations have been adopted as volunteered conditions of consent. On this basis, the residual effects on land stability are assessed as less than minor. The adverse effects on land stability will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.15 Construction-Related Effects

Construction of the Project will be delivered in stages. Works will include site preparation works, bulk earthworks, infrastructure installation, stormwater and landscape works and the progressive construction of the apartment blocks. An effective construction management approach has been developed to minimise potential adverse construction effects. The approach consists of a suite of management plans and protocols that be implemented to manage construction-related effects and include:

- (a) Environmental Management Plan
- (b) Erosion and Sediment Control Plan
- (c) Transport Management Plan

Together, these plans provide a comprehensive framework for managing construction actual and potential construction effects. With the implementation of, and adherence to, the above management measures it is considered that construction activities can be undertaken in a manner that avoids unreasonable adverse effects on the environment, particularly nearby sensitive residential receivers. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.15.1 Earthworks Overview

Earthworks are required to facilitate the proposed development and associated infrastructure. Earthworks within the residential development area (Lot 3 DP 606744, Section 9 SO 485598 and Lot 2 DP 617529) have been applied for under district and regional consents RM260566 and RM26.282. The earthworks proposed under this application relate to all external infrastructure works requiring earthworks outside of the residential development area.

The proposed earthworks will be managed through a comprehensive suite of construction management measures and consent conditions, including the EMP and ESCP. These measures will ensure that earthworks are undertaken in a controlled manner and that potential erosion, sediment, dust and construction-related effects are appropriately avoided, remedied or mitigated.

Earthworks are also proposed within the road reserve along the southern boundary of the residential development area to enable the formation of a future pedestrian connection and to remove the existing bund. These works are necessary to deliver the TPLM Structure Plan and frontage outcomes for the TPLM Zone. QLDC's Property & Infrastructure (P&I) team have been engaged throughout the design process and will continue to be consulted as the detailed design for the associated capital works is refined. Any works within the road reserve will be undertaken in accordance with QLDC standards and will be subject to necessary approvals and construction management controls.

Overall, while the earthworks will result in temporary construction-related effects, these effects can be appropriately managed through the proposed construction methodology, management plans and consent conditions. Subject to the implementation of these measures, the adverse effects associated with earthworks are expected to be appropriately avoided, remedied or mitigated and will not be out of proportion with the significant regional benefits of the Project.

8.15.2 Soil erosion, generation and run-off of sediment

Earthworks associated with the Project will be temporary in nature and associated with the construction of transport and three waters infrastructure, related with the development of the area for urban land uses, as anticipated by the TPLM Zone. Appropriate erosion and sediment control measures will be in place during all earthworks to prevent sediment from leaving the Site or entering nearby waterways, as discussed below.

All proposed measures will be designed and implemented in accordance with the QLDC guidelines for Environmental Management Plans, with specific provision for erosion and sediment control during preparation and construction.

An EMP has been prepared for the Site which covers earthworks management. Earthworks will be undertaken in accordance with the attached EMP and ESCP (**Appendix L**), which outline the methods, sequencing, and environmental controls to be applied throughout the works. The EMP includes measures for erosion and sediment control, dust suppression, stabilisation of exposed surfaces, and protection of downstream environments. The EMP will also integrate standard construction management practices, including site access protocols, stockpile management, and monitoring requirements to ensure compliance with consent conditions.

The proposed erosion and sediment control measures will significantly reduce the potential for soil erosion and sediment-laden runoff to occur during the earthworks period. By intercepting, slowing, and treating runoff at multiple points across the Site, the controls ensure that any sediment generated through soil disturbance is retained within the construction footprint.

Clean water diversion bunds prevent uncontaminated upstream flows from entering the earthworks area, thereby reducing the volume of water requiring treatment and minimising the risk of sediment mobilisation. Conversely, dirty water diversion structures ensure that any runoff from disturbed soils is directed into the designated treatment system. This dual-diversion strategy will reduce sediment discharge risk at source.

Regular inspection, monitoring, and maintenance of the erosion and sediment control devices provide an additional layer of protection. Daily checks, weather-responsive inspections, and post-rainfall assessments ensure that any issues are identified and rectified promptly,

maintaining the functionality of the controls throughout the construction period. This active management approach reduces the likelihood of device failure, overtopping, or bypassing during high-rainfall events.

Overall, these measures ensure the potential adverse effects of soil erosion and sediment runoff on the wider environment, including downstream waterways, stormwater, and adjacent land are no more than minor and will not be out of proportion to the significant regional benefits of the Project.

8.15.3 Construction noise and vibration

Construction of the development will generate noise and vibration typical of a large, multi-stage residential project. Construction noise effects generated by the Project have been assessed in the Acoustic Assessment prepared by Bladon Bronka Acoustics Ltd dated 22 May 2026 (BBA Report). The BBA Report states that construction activities will be long-term in duration, occurring over more than 20 weeks, and will generally take place between 7:30am and 6pm on weekdays. Construction noise will therefore be assessed against the “long-term” limits in NZS 6803:1999, which allow up to 70 dB LAeq during standard daytime working hours. The Acoustic Assessment notes that these limits apply at the façades of occupied buildings, including a +3 dB allowance for façade reflection. Based on the nature of the works and separation distances to existing dwellings, the acoustic expert concludes that construction noise can be managed to comply with NZS 6803, and that any exceedances can be addressed through standard mitigation and management techniques.

The closest existing receivers include residential properties on Springbank Grove, Frankton-Ladies Mile Highway, Lower Shotover Road, and Stalker Road, as well as the cemetery to the west. The Acoustic Assessment identifies these receivers and confirms that construction noise can be kept within the recommended limits through typical measures such as equipment selection, scheduling of high-noise activities, and site management. The Assessment also confirms that construction vibration will comply with DIN 4150-3 building damage criteria for residential structures, which specify peak particle velocity limits of 5–15 mm/s depending on frequency. Human amenity vibration limits are not specified in the PDP, but the Assessment adopts a recommended guideline of 2 mm/s PPV for occupied buildings. The Assessment concludes that vibration effects can be appropriately managed and are not expected to result in building damage or unreasonable disturbance.

Overall, construction noise and vibration effects will be temporary, occur during daytime periods, and can be managed through a CNVMP, which is proposed as a condition of consent. The Acoustic Assessment states that construction sound must be managed in accordance with NZS 6803, and confirms that compliance is achievable. The effects on existing residents will be typical of an urban development and will not be unreasonable provided the recommended management measures are implemented. Taking into account the expert assessment and the expected construction environment for a project of this scale, adverse effects will be no more than minor and acceptable. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.16 Operational Noise Effects

The operational acoustic effects of the Project have been assessed in the Acoustic Assessment prepared by Bladon Bronka Acoustics Ltd dated 22 May 2026. This assessment considers reverse sensitivity effects arising from SH6 and commercial activities, and operational noise.

8.16.1.1 Reverse sensitivity

Predicted noise from SH6 has been modelled to the facades of the proposed apartments, including the reduced speed of 60km/hr and asphalt road resurfacing. This demonstrates traffic noise levels up to 71dB $L_{Aeq(24hr)}$. The proposed apartment buildings will incorporate mechanical ventilation and air conditioning so that windows can remain closed when required, together with high-mass external wall and roof constructions and glazing specified to achieve the necessary sound insulation. With these measures the Acoustic Assessment concludes that internal noise levels within habitable rooms can achieve the 40dB $L_{Aeq(24hr)}$ requirement in Rule 49.5.38 of the PDP, thereby appropriately managing reverse sensitivity effects from the state highway.

The Acoustic Assessment recommends a condition of consent requiring a suitably qualified acoustic consultant to demonstrate that the final building envelope of all apartments located within 80m of SH6 meets this 40dB $L_{Aeq(24hr)}$ requirement, and this is volunteered as a condition of consent. Refer to **Appendix Y** for the full suite of volunteered conditions.

The Acoustic Assessment also considers reverse sensitivity effects from the commercial activities proposed within the development. It notes that commercial activity noise can vary depending on the activity (i.e. a bar vs a retail store), and that amplified music has greater potential to create disturbance, particularly at night because of its low-frequency and impulsive characteristics. Future activities within the commercial development lot will be managed by the PDP as well as a consent notice requiring compliance with the noise standards proposed within the Local Centre Zone. The BBA Report does note that amplified music from a gym or bar could cause disturbance, however this is not an effect arising from the Project, and can be managed through required resource consents at that time.

Overall, reverse sensitivity effects to SH6 are fully mitigated through façade design and mechanical ventilation, and the development will not constrain the operation of the highway. Reverse sensitivity to the Local Centre is appropriately managed through compliance with noise limits and the provision of mechanical ventilation. The Acoustic Assessment supports the conclusion that these noise effects are less than minor. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.16.1.2 Operational noise

Operational traffic and service noise generated within the development, including vehicle movements to and from parking areas and access roads, has also been assessed.

Individual HVAC systems are proposed for each apartment, with no centralised plant proposed. Resulting noise emissions are expected to be inaudible due to this. HVAC noise resulting from commercial premises are expected to be higher, however with mitigation and acoustic design

will meet noise limits at the nearest apartment building on the development. Noise levels at all external receivers are expected to be inaudible.

The development will generate vehicle movements typical of a medium-to-high density residential neighbourhood, including traffic associated with the internal street network and the collector road that forms part of the TPLM Structure Plan. The Acoustic Assessment confirms that noise from internal vehicle movements will not result in unreasonable amenity effects for neighbouring sites or future residents. The design of internal streets, courtyards, and parking areas ensures that noise is dispersed and moderated by the built form, and no unreasonable amenity effects are anticipated for future residents.

Road C1's function, alignment, and anticipated traffic volumes have already been established through the rezoning of the land and the adoption of the Structure Plan. The PDP has assessed and accepted the effects of a collector road in this location, including the higher traffic volumes associated with medium and high density housing and the commercial activities provided for within the Zone. As the Structure Plan was endorsed through a public process, neighbouring properties are reasonably expected to be aware of the future construction and operation of the collector road and the associated noise environment. The noise effects associated with vehicle movements on the collector road are anticipated by the planning framework, have already been accepted through the rezoning and structure planning process, and will not result in adverse effects beyond those contemplated for this part of the TPLM Zone.

Overall, subject to the recommended mitigation in the Acoustic Assessment which is addressed as volunteered conditions, any adverse noise effects resulting from the Project are expected to be less than minor. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.17 Traffic and Transport Effects

The transport effects of the Project need to be understood within the wider TPLM transport context, where SH6 already operates under peak-period constraint and where corridor-wide upgrades will be delivered progressively as development across the Mile occurs. Both the Bartlett ITA (**Appendix I**) and the Don McKenzie Consulting Transport Peer Review (**Appendix J**) confirm that the Project provides the transport improvements reasonably attributable to its scale, including the new SH6/Stalker-Lower Shotover signalised intersection, bus stops, active travel links, and a portion of the westbound bus lane required under the TPLM Zone provisions. As the peer reviewer notes, these facilities “will have wider benefits to both future residents of the Project as well as existing and future residents of the surrounding area” and form part of a shared programme of upgrades delivered by multiple landowners and transport agencies.

The BBO modelling appended within the Integrated Transport Assessment by Bartlett Consulting (**Appendix I**) shows that SH6 will continue to experience delay during the AM peak, broadly consistent with existing conditions. This reflects the current structural constraints of the corridor, particularly the Shotover River bridge, rather than effects attributable to this development alone. The peer review is explicit that Simplicity “should not and cannot be required to solve regional transport constraints as long as it addresses the effects of its own development,” with wider SH6 issues needing to be resolved at a network level by NZTA, ORC and QLDC.

Within the residential development, the Project adopts design measures that make walking, cycling and public transport more convenient for everyday travel. The Bartlett ITA identifies that the TPLM Zone anticipates congestion will remain on SH6, and therefore requires developments to provide genuine modal choice. The Project responds by consolidating car parking into multi-storey buildings rather than at each unit, meaning residents must make a conscious decision to retrieve their vehicle while high-quality active and public transport facilities are readily accessible. This approach aligns with the Zone's transport strategy, which relies on minimum residential densities and improved public transport infrastructure to support viable mode shift.

The wider mode-shift outcomes anticipated by the TPLM Zone depends not only on individual developments but also on the timely delivery of strategic transport infrastructure by NZTA, ORC and QLDC. The TPLM variation that established the Zone includes transport triggers to ensure development is integrated with bus priority and active travel upgrades. As the peer review notes, achieving (or exceeding) the density sought through the Zone will help create the demand required to support ongoing improvements to the public transport system along Frankton-Ladies Mile Highway and SH6.

Overall, the expert assessments consider that SLL is contributing a fair and reasonable share of transport infrastructure required to support its development, that the Project aligns with the TPLM transport strategy, and operates within a corridor where existing constraints, not this development, drive peak-period performance. The ability to realise the housing capacity and transport outcomes anticipated by the Zone will depend on coordinated delivery by the Councils and NZTA as development across the Mile progresses. The adverse traffic and transport effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.17.1 Internal Transport Effects

The proposed development establishes a comprehensive internal transport network that is consistent with the transport outcomes anticipated for the Medium Density Residential Precinct.

The internal transport network has been designed to support a medium to high-density residential environment and to integrate with the wider TPLM transport strategy. The collector Road C1 forms the primary movement spine through the development, providing for general traffic, pedestrians, cyclists, and future bus services. The Bartlett ITA confirms that the collector Road C1 has been designed with widths and configurations consistent with its anticipated role as a future bus route, aligning with the TPLM Zone requirement that collector roads north of SH6 be capable of supporting efficient public transport operations. Internal streets are arranged to create a legible and permeable movement network, enabling residents to move easily between residential units, open spaces, commercial areas, and external connections to Lower Shotover Road and SH6.

Walking and cycling connections within the residential development are a core component of the internal transport environment. The ITA identifies that the development includes internal and external active travel links that encourage residents to walk or cycle to nearby communities such as Lake Hayes Estate, Shotover Country, and Frankton. These connections are consistent with the transport objectives of the TPLM Zone, which require high-quality, well-connected, and legible walking and cycling routes that link to existing networks outside the Zone. The peer

review supports this conclusion, noting that the Project contributes to a connected land-use and transport system that will reduce private vehicle dependence over time.

Within the residential development, pedestrian and cycling safety is supported through the design of internal streets, which incorporate slow-speed environments, and clear sightlines. The ITA confirms that internal active travel movements can be accommodated safely and efficiently, and that the internal network provides a high level of amenity for pedestrians and cyclists. Cycle parking is provided at a rate of at least one space per unit, supporting active travel. The ITA confirms that both internal and external cycle parking is provided, enabling residents to store bicycles securely and conveniently. This supports the use of cycling for local trips and commuting.

Parking within the development is provided through two multi-storey parking buildings and 505 on-street parks. The ITA confirms that 1,105 allocated residential spaces and additional visitor and café/office spaces are provided. This parking strategy supports the transport objectives of the TPLM Zone, which seek to limit on-site carparking for non-residential activities and encourage mode shift. The use of parking buildings rather than garages or extensive individual at grade parking is a deliberate design choice that contributes to reducing private vehicle dependence. While residents are likely to own cars, particularly given Queenstown's resort-town context, the location of parking within dedicated structures makes car use less convenient for short trips. Residents must walk to the parking buildings rather than having immediate access to a vehicle outside their unit, which goes some way to encouraging the use of walking, cycling, or public transport for everyday travel, especially commuting. This design approach aligns with the TPLM transport strategy, where the separation of car storage from residential units is used to support modal shift in higher-density environments and contribute to reducing private vehicle reliance over time.

Servicing and storage spaces are located and designed to minimise adverse effects on occupants, neighbours, and public spaces. Waste collection areas, loading zones, and service vehicle access points are positioned away from primary pedestrian routes and screened from public view where appropriate. These spaces are functional, safe, and conveniently accessible for residents and service providers, ensuring that servicing activities do not conflict with active travel movements or detract from internal amenity. The internal street network also provides clear and unobstructed emergency access, with the collector road and secondary streets designed to accommodate emergency vehicles and provide visible, direct routes into and through the residential development.

Overall, the internal transport network is designed to support a comprehensive residential environment, encourage active and public transport use, and provide safe and efficient movement for all users. The ITA and peer review both confirm that internal transport effects are acceptable and consistent with the outcomes sought for the TPLM Zone. there will be no significant adverse effects relating to internal traffic and any effects will not be out of proportion to the significant regional benefits of the Project.

8.17.2 External Transport Effects

The development will generate additional traffic movements on the surrounding road network, particularly on SH6 and Lower Shotover Road. These effects have been assessed in detail through the Bartlett ITA and the BBO Transport Modelling Technical Memorandum included

within **Appendix I**, both of which adopt conservative assumptions regarding trip generation, distribution, and mode share. The peer review confirms that these assumptions are appropriate and likely to overestimate actual peak-period traffic generation, noting that real-world behavioural factors such as peak spreading, working from home, and workers' transport services will reduce peak demand. The modelling therefore provides a robust basis for understanding external transport effects.

The Project includes several significant transport upgrades that will improve the operation of the surrounding network and support the transport strategy underpinning the TPLM Zone. These upgrades include:

- (a) the signalisation of the SH6/Stalker Road/ Lower Shotover Road roundabout
- (b) signalised intersection at Lower Shotover Road and Road C1
- (c) the installation of bus stops on SH6, and the creation of a westbound bus lane between Stalker Road and the Shotover River
- (d) vehicle crossing onto Spence Road Upgrade
- (e) active travel path along Lower Shotover Road and SH6

The ITA states that signalised intersections will allow traffic to be managed more effectively than the existing roundabout configuration, enabling prioritisation of specific movements and providing safe pedestrian and cycle crossings. The peer review supports this conclusion, noting that signalised intersections will help distribute delay and queuing across the network and improve overall transport effectiveness. These upgrades are consistent with the transport triggers identified in the TPLM Zone provisions and represent a fair and reasonable contribution to the transport infrastructure required to support development in the Zone.

The transport modelling identifies that SH6 will continue to experience peak-period congestion, particularly westbound during the AM peak and eastbound during the PM peak. This congestion is a function of the existing SH6 corridor and the capacity constraint at the Shotover River bridge, which limits throughput to approximately 1,600 vehicles per hour. The peer review emphasises that this constraint is a regional transport issue and not one that can be resolved by a single development. The Bartlett ITA similarly acknowledges that the Project will not remove congestion from SH6, but will attempt to better manage it as well as contribute to a transport environment that supports mode shift and reduces private vehicle dependence over time. The modelling shows that while queuing on SH6 may reduce slightly with the introduction of signals, queuing on Lower Shotover Road and Stalker Road will increase. The peer review considers this outcome to be expected and acceptable, noting that the modelling represents a "moment in time" and that the future transport environment will evolve as other developers and public agencies deliver additional infrastructure.

The Project does not deliver all transport upgrades anticipated by the TPLM Zone or the wider Queenstown Public Transport Business Case. In particular, some bus priority measures, such as the full SH6 bus lanes originally proposed under the NZ Upgrade Programme, are not funded and will not be delivered ahead of occupation. The ITA acknowledges that the Project "will not meet all of these transport infrastructure triggers," and that some improvements will be delivered progressively across the Zone as it is developed. The peer review supports this position, noting that public agencies and other developers are better placed to deliver integrated upgrades along

the corridor and that it would not be equitable to require a single development to resolve regional transport constraints. This approach is consistent with the approach that developers should address the effects of their own development but are not responsible for funding corridor-wide improvements to the State Highway network, outside of those directly required by the plan provisions.

Public transport effects are a key consideration. The ITA identifies that the Project will support improved public transport effectiveness by providing bus stops on SH6 and contributing to bus priority infrastructure. The peer review confirms that the Project aligns with the Queenstown Public Transport Business Case, which seeks to increase bus frequency and capacity and achieve significant mode shift. While the modelling indicates that bus services will continue to experience delay during the AM peak, the peer review notes that this reflects the current SH6 constraint and that the Project contributes appropriately to the long-term transport strategy for the corridor. The modelling does not account for the future high school within the TPLM Zone, which would reduce peak-period traffic volumes by removing school-related trips from Lake Hayes Estate and Shotover Country.

The proposed workers' accommodation will not materially alter the transport effects already assessed for the Project. The accommodation is intended to temporarily house construction workers in place of some residential occupiers during the build period, rather than in addition to the ultimate residential yield. As a result, the trip generation, distribution and network performance outcomes identified in the Integrated Transport Assessment and peer review remain valid, and no separate or additional transport modelling is required. In practice, accommodating workers on site will reduce the need for daily commuting from elsewhere in the district, thereby lessening external transport effects associated with construction activity. Any transport effects arising from the workers' accommodation component are therefore appropriately captured within the existing transport assessment for the development and are expected to be minor.

Overall, external transport effects are consistent with the outcomes anticipated by the TPLM Zone and the underlying transport strategy. The Project makes a fair and reasonable contribution to the transport infrastructure required to support development in the Zone and does not result in adverse effects beyond those already contemplated through the rezoning and Structure Plan process. The modelling confirms that while congestion will remain on SH6, the Project supports a transport environment that encourages mode shift, improves public transport effectiveness, and integrates land use and transport in a manner that supports a sustainable and resilient transport network for the Eastern Corridor. It is considered that there will not be any significant adverse effects relating to external traffic and in any event, the external traffic effects will not be out of proportion to the significant regional benefits of the Project.

Provision for a High School

The TPLM Zone includes a restricted discretionary rule (Rule 49.4.6) that limits residential development to 1,100 units until a high school within the Zone is operational. Discretion is restricted solely to effects on the transportation network.

SLL has consulted with the Ministry of Education (MoE) to understand its strategic planning for schooling provision in the area, with the MoE correspondence provided within **Appendix U**. The Bartlett ITA confirms that all transport modelling has been undertaken on the basis that no

secondary school exists east of the Shotover River, meaning the assessment reflects the current schooling pattern in which students travel west to Wakatipu High School. The modelling therefore does not rely on, or assume, any reduction in peak-period trips that might occur if a future high school were established within the Zone. The MoE letter reinforces this context, noting that Wakatipu High School “currently has capacity to accommodate some additional students in the short term” and that planning for a new secondary school east of the river is underway but dependent on sustained population growth, funding availability, and delivery timeframes. MoE is also clear that school provision is not intended as a mechanism to address transport effects, which must instead be managed through appropriate transport planning and infrastructure. Nevertheless, longer term a school is proposed for the area and while not relied on for the purpose of this assessment will assist in the shift towards reducing reliance on the highway and encouraging internal TPLM use.

The transport effects of the Project are managed as well as they can be within the constraints of the existing SH6 corridor. The modelling shows that congestion will continue, particularly during the AM peak, but this reflects the current state of the network rather than effects attributable to this development alone. The Project contributes signalised intersections, bus stops, active travel links, and a portion of the bus priority infrastructure anticipated by the Zone, and the peer review confirms that these upgrades represent a fair and reasonable contribution to the wider transport system. While the effects may be more than minor, they are not significant in the context of the existing corridor performance. MoE’s advice supports this conclusion: schooling provision will occur when needed, but it is not required now, and its absence does not create additional or unreasonable transport effects for the Project.

Overall, the transport effects associated with residential units above 1,100 are acceptable. The modelling appropriately reflects the rule’s intent. The Ministry has advised of its intention to provide a high school when it is needed, based on their strategic planning. The Project does not rely on a school to mitigate transport effects.

8.17.3 Construction Transport Effects

The TPLM Zone is a new greenfield area earmarked for intensive urban development, and its provisions require extensive external transport upgrades and services to be delivered. As these upgrades are progressively implemented by multiple landowners and the relevant transport agencies, there will inevitably be periods of disruption to the wider community and the SH6 corridor. This is an expected and unavoidable part of realising the Zone’s purpose and enabling the housing capacity it was designed to provide.

Construction of the development will generate temporary transport effects, most of which will be contained within the residential development area and managed through standard construction management practices. The Project will require the importation of some earthwork fill, although in the overall scale of the development this represents a modest volume and will not materially affect the surrounding transport network. Construction traffic will be concentrated during the early earthworks and civil works phases, with movements reducing as vertical construction progresses. A temporary construction access point will be established and designed to ensure safe entry and exit for heavy vehicles while minimising disruption to general traffic on Lower Shotover Road and SH6. A TMP will be prepared and is volunteered as a condition of consent. The associated effects will be short-term, managed, and typical of a project of this scale, effects will be managed appropriately through the TMP.

Within the residential development area, construction activity will be staged and managed through the TMP, as well as a detailed EMP and ESCP. These plans will set out measures to manage dust, noise, sediment, traffic routing, and contractor parking, ensuring that construction effects do not spill into neighbouring properties or the wider transport network. Heavy vehicle movements will be scheduled to avoid peak periods where practicable.

Where the Project delivers external transport upgrades such as signalised intersections, bus stops, and portions of bus priority infrastructure, construction works will occur within the road corridors managed by QLDC and NZTA. These works will require close coordination with both agencies to ensure safe temporary traffic management, maintain network performance, and minimise disruption to existing road users. The Applicant will work collaboratively with QLDC and NZTA to obtain the necessary approvals, prepare traffic management plans, and sequence works in a manner that aligns with agency requirements and minimises impacts on SH6 and Lower Shotover Road. Any temporary lane closures or speed restrictions will be short-term and managed through approved traffic management plans.

Overall, construction-related transport effects will be temporary, localised, and appropriately managed through conditions requiring management plans. While construction activity will generate additional vehicle movements, these effects are typical of a project of this scale and will be mitigated through careful staging, temporary access arrangements, and coordination with the relevant road controlling authorities. The effects are therefore acceptable and consistent with the outcomes anticipated for development within the TPLM Zone. They will not be out of proportion to the significant regional benefits of the Project.

8.18 Infrastructure Effects

Given the scale and intensity of the Project, significant three waters infrastructure upgrades are proposed to service the development. McKenzie & Co have prepared detailed engineering investigations, hydraulic modelling, and servicing assessments to confirm the infrastructure required. The assessment below summarises the proposed servicing approach and considers whether the infrastructure can be delivered in a manner that appropriately avoids, remedies, or mitigates potential adverse effects.

Stormwater infrastructure

Stormwater represents the most significant infrastructure consideration given the scale of impervious surfaces proposed and the presence of upstream Slope Hill catchments. Consequently, stormwater management represents one of the primary infrastructure considerations associated with the Project. The engineering assessments demonstrate that these potential effects have been specifically addressed through the adoption of an integrated stormwater management strategy.

The proposed stormwater system adopts an integrated treatment and soakage-based approach that captures, treats and disposes of runoff generated by both the development and associated transport infrastructure. The system captures runoff close to source, provides water quality treatment prior to discharge, and disposes of stormwater through distributed soakage systems rather than concentrated downstream discharges. Within both the road corridor and development catchments, runoff will be collected via piped reticulation networks and conveyed through a series of treatment devices including catchpits, silt traps, gross pollutant traps,

proprietary treatment devices and treatment manholes prior to entering the soakage network. This approach assists in removing sediment, gross pollutants and other contaminants commonly associated with urban development and road runoff before infiltration occurs, thereby reducing water quality effects and protecting the long-term performance of the soakage infrastructure

Potential flooding effects have also been comprehensively assessed through hydraulic modelling prepared by BBO (included within **Appendix K**) and within the Civil Engineering Infrastructure Report (**Appendix L**). The modelling demonstrates that stormwater generated from both the roading infrastructure and the development area can be captured, conveyed and infiltrated within the proposed soakage systems during the 1% AEP rainfall event, including climate-change-adjusted rainfall projections. The road stormwater modelling concluded that the reticulation network operates without surcharge or flooding during the design event and that both assessed soakage configurations are capable of infiltrating the entire design storm volume without overflow. Similarly, the broader site-wide modelling demonstrates that stormwater generated within the development can be managed through the proposed treatment and soakage network in accordance with the TPLM requirements. Accordingly, the Project is not expected to increase flood risk either within the development or on surrounding properties during the design event.

Overall, the proposed stormwater strategy incorporates extensive treatment, attenuation, infiltration and maintenance measures that have been demonstrated through hydraulic modelling to effectively manage stormwater generated by the development. Subject to detailed design confirmation and implementation of the proposed mitigation measures, stormwater effects are considered to be appropriately avoided, remedied or mitigated and are therefore expected to be no more than minor.

Wastewater Infrastructure

The development will substantially increase wastewater generation compared to the existing undeveloped state. The engineering assessments, specifically the Civil Engineering Infrastructure Report which includes the Co Wastewater Servicing Assessment and Water Acumen Wastewater Modelling and Capacity Assessment, included within **Appendix L**, identify that additional public wastewater infrastructure upgrades are required to accommodate projected growth within both the development and the wider TPLM area. The detailed investigations undertaken by McKenzie & Co and Water Acumen demonstrate that adequate wastewater servicing can be provided through a combination of on-site reticulation and staged upgrades to the wider public network, including new trunk mains, pump station capacity checks, and confirmation of downstream treatment plant performance requirements.

The principal mitigation for potential wastewater effects is the implementation of a staged infrastructure delivery programme. Stage 1 involves construction of a new 450 mm wastewater main extending from the eastern end of the Shotover Bridge to the residential development area and is required prior to connection of the first dwelling. Stage 2 involves construction of a further 450 mm trunk main extending from the western side of the Shotover Bridge to the Shotover Wastewater Treatment Plant and is triggered before development reaches identified growth thresholds. SLL is proposing to construct and deliver Stage 1 to support the Project. It is seeking consent for Stage 2, but will not deliver this infrastructure if it is not required.

These upgrades form part of the wider TPLM wastewater servicing strategy and are consistent with the infrastructure assumptions underpinning the TPLM Zone. The supporting Water Acumen assessment (attached within the Civil Engineering Infrastructure Report **Appendix L**) concludes that these upgrades provide sufficient capacity to accommodate both the Project and growth anticipated within the wider TPLM area. By linking infrastructure upgrades to development staging, the Project ensures that wastewater capacity is available before demand exceeds the performance of the existing system.

The workers accommodation component of the Project will operate temporarily during construction and will not connect to the new wastewater infrastructure proposed to service the residential development. Instead, wastewater from the accommodation units will either be managed through connection to the existing reticulation network or removed from the development via trucked servicing, meaning it does not contribute to the loading assumptions used in the McKenzie & Co and Water Acumen wastewater modelling. As the accommodation replaces some residential occupancy during the construction period rather than adding to the ultimate population, it does not alter the long-term wastewater demand profile assessed for the Project.

Water Infrastructure

The Civil Engineering Infrastructure Report (**Appendix L**) estimates a peak water demand of approximately 104.81L/s associated with the completed development. Additional demands will also arise from firefighting requirements, commercial activities and future population growth. Without investment in strategic infrastructure upgrades, there would be a risk that existing network capacity and pressure could be insufficient to service the development. Accordingly, water supply is a key infrastructure effect requiring assessment.

The Civil Engineering Infrastructure Report demonstrates that an integrated water supply solution is available to service the development. The Project includes construction of a new internal ring main network comprising a 450mm main along the eastern boundary of the residential development area, and 280mm mains around the remainder of the development. This network will be supplied by a future reservoir located on adjacent land that has already been consented under RM230721. The ring-main configuration provides resilience, network redundancy and the ability to distribute water throughout the development in a manner consistent with QLDC servicing requirements.

Firefighting requirements have also been incorporated into the proposed design through provision of hydrants and network sizing consistent with applicable standards. The proposed ring main arrangement improves system reliability and assists in maintaining adequate pressure throughout the development. Together with the planned reservoir and strategic trunk infrastructure upgrades, these measures ensure both domestic and emergency water demands can be accommodated.

Overall, while the Project will generate substantial additional demand on the public water supply system, the Civil Engineering Infrastructure Report demonstrates that these effects can be appropriately mitigated through construction of the proposed internal reticulation network and implementation of the staged off-site infrastructure upgrades. Subject to delivery of the identified network improvements, the proposed development can be adequately serviced and water supply effects are considered to be acceptable. In this regard, any adverse effects will be

avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.19 Waste Management

Operational waste for the Project will be managed through a comprehensive on-site system designed by WM New Zealand. The OWMP (**Appendix O**) sets out the waste generation calculations, bin requirements, collection frequencies, and operational procedures for the development. The system is based on recognised industry methodology and provides for the full waste needs of 1,085 residential units and an estimated maximum occupancy of 3,506 residents. The assessment below relies on the expert evidence contained in the OWMP.

Waste is stored entirely within sixteen communal waste areas located throughout the development. Each waste area is sized according to the number of units and occupants it serves, with floor areas ranging from approximately 9m² to 19m². The OWMP confirms that waste volumes have been calculated using the Auckland Council Multi-Unit Development Space Calculator, which is the accepted standard where no region-specific calculator exists.

Each waste area provides for the separation of general waste, mixed recycling, and glass recycling, ensuring that waste is managed in accordance with recognised best practice and reducing the potential for contamination. WM New Zealand has confirmed that the proposed system is serviceable and that the recommended bin numbers and collection frequencies can be provided.

The OWMP sets out the calculated weekly volumes for each waste stream and identifies the corresponding bin sizes, quantities, and collection frequencies required to service each waste area. Collection frequencies range from two to four times per week depending on occupancy and waste generation rates. This level of servicing ensures that waste storage capacity is sufficient, that bins are emptied before reaching capacity, and that no overflow or accumulation of waste occurs. All waste storage and collection activities occur within enclosed, purpose-built waste rooms located on-site. These areas have been designed to meet accepted standards for access, ventilation, hygiene, and manoeuvring space.

The OWMP also includes operational requirements relating to bin hygiene, signage, general cleanliness, noise management, and health and safety, ensuring that waste is managed in a manner that avoids odour, litter, and other potential adverse effects.

Waste collection vehicles will access the residential development via Road C1 off Lower Shotover Road. Vehicle tracking (see the Civil Engineering Drawings attached within **Appendix L**) has been undertaken to confirm that collection vehicles can safely enter, manoeuvre within, and exit the development. The external effects associated with waste collection are limited to scheduled vehicle movements and short-duration servicing activities. These movements are typical for multi-unit residential developments and do not materially alter traffic volumes on Lower Shotover Road. The Project does not rely on QLDC kerbside collection, and no QLDC-provided waste infrastructure is required to support the development. All waste management infrastructure is privately provided and operated.

Overall, the waste management system for the Project is comprehensive, private, and designed in accordance with recognised best practice. The OWMP provides detailed calculations, design

specifications, and operational procedures that demonstrate the system can operate without generating adverse effects on the environment. Based on the expert analysis, adverse effects associated with internal waste infrastructure are assessed as less than minor and will not be out of proportion to the significant regional benefits of the Project.

8.20 Natural Hazard and Climate Change Effects

The Project has been assessed for its susceptibility to natural hazards and the potential implications of climate change as required under the FTAA. It is noted that the residential development area is not within an identified flood hazard zone, or an area of known liquefaction risk and geotechnical investigations confirm that the land is suitable for residential development.

Stormwater management has been specifically designed to respond to the effects of climate change, including increased rainfall intensity and frequency. The system incorporates treatment and detention models assesses the 1% AEP and 0.4% AEP storm events including climate change where appropriate, and have been prepared in accordance with QLDC Code of Practice Section 4.3.5 and the QLDC Stormwater Modelling Specification. Overland flow paths and secondary flow channels are provided to ensure the safe conveyance of excess runoff.

Solar Panels

The Project also incorporates community solar panels on the roof structures of the two parking buildings. These panels will provide an on-site renewable energy source that supports the long-term resilience and adaptability of the development in response to climate change. By generating renewable electricity within the development, the solar panels will assist in reducing reliance on external energy supply, support greater self-sufficiency for shared community facilities and common infrastructure, and contribute to lower operational greenhouse gas emissions over the life of the development. While the solar panels are not required to mitigate an identified natural hazard risk, they form part of the broader sustainability response embedded within the Project and will support a more resilient, efficient and climate-responsive residential community.

Electric Vehicle Charging Stations

The Project also includes three EV charging stations within each of the two parking buildings, providing a total of six EV charging stations across the development. While the development has been deliberately designed to reduce reliance on private vehicle use through consolidated parking, strong pedestrian and cycle connections, and access to public transport, the provision of EV charging infrastructure supports residents who still require access to a private vehicle to choose a lower-emissions option. The charging stations will encourage the uptake and use of electric vehicles within the community, provide flexibility for residents as vehicle technology and travel behaviours continue to change, and further contribute to reducing operational transport-related greenhouse gas emissions over the life of the development. In this way, the EV charging infrastructure complements the broader sustainability and climate change response of the Project by supporting lower-impact personal vehicle use where private vehicle travel remains necessary.

No other significant natural hazard risks, such as coastal erosion or sea level rise, are relevant to the development. Based on this assessment, the Project is considered resilient to the

anticipated impacts of climate change and natural hazards and does not require additional hazard mitigation.

8.21 Cultural and Archaeological Effects

There are no known sites of historic or cultural significance within the Site. A Heritage and Archaeological Values Assessment was prepared as part of the TPLM Plan process (attached as **Appendix BB**). Based on available information, it is considered unlikely that any such features remain within the Site. The Site is not subject to the Wāhi Tūpuna overlay.

Notwithstanding this, accidental discovery protocols will be applied across all areas of the Site. These protocols ensure that any unexpected finds are managed appropriately in accordance with legislative requirements and recognised best practice.

Adverse effects are considered to be less than minor and will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.22 Subdivision Effects

As a consequence of introducing new legal boundaries *after* construction, a number of technical non-compliances arise in relation to setbacks, recession planes, outlook space and building separation. These non-compliances do not represent adverse built form effects, as the buildings will already exist in their final form and have been assessed comprehensively under the land use component of this combined application.

The boundary-related infringements are a product of the titling pattern rather than the physical development. They do not alter the built form, do not generate additional effects, and do not change the way the development interacts with neighbouring sites or public interfaces.

Accordingly, while the subdivision technically triggers breaches of certain built form standards, the effects associated with those standards have already been fully assessed under the land use component. The subdivision does not introduce new environmental effects beyond those already considered.

To ensure the long-term, coordinated operation of the development, a management entity or other legal body will be established. This is volunteered as a condition of consent in the suite of conditions attached as **Appendix Y**. This entity will be responsible for the collective management of the superlots and shared assets, including internal roading, pedestrian networks, infrastructure, communal open space, and landscape areas.

The management structure is intended to operate across the entire residential development, reflecting the comprehensive nature of the land use design. It provides a mechanism to ensure that maintenance, renewals, and operational responsibilities are undertaken consistently and collaboratively, regardless of the later subdivision pattern or individual ownership arrangements.

This approach ensures that the functional and amenity outcomes assessed under the land use component are preserved over time.

The management entity reinforces the integrated nature of the development and provides certainty that shared assets will be maintained to a high standard, supporting the overall quality, safety, and amenity of the built environment.

All necessary easements will be created and registered at the time of subdivision to ensure the protection, operation, and maintenance of both public and private infrastructure. This includes easements for access, public and private utilities, shared roading, pedestrian connections, and any infrastructure located across superlot boundaries. These instruments ensure that all parties retain the legal ability to access, maintain, repair, and upgrade assets irrespective of the later titling pattern.

Overall, adverse effects resulting from the subdivision will be less than minor and will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

8.23 Effects Conclusion

Overall, the actual and potential adverse effects of the Project are considered to be minor. The Project has been carefully designed to avoid, remedy or mitigate effects through the application of contemporary, context-responsive urban design principles, best practice stormwater management, infrastructure upgrades, and construction management. All adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

Supporting technical assessments confirm that environmental effects can be appropriately managed, and the Project will integrate well with the existing urban environment. Subject to the proposed conditions of consent, the Project is considered to represent a sustainable and well-managed form of urban development. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

9 CONCESSION APPROVALS (UNDER SECTION 42(4)(E))

A concession approval that would otherwise be sought under the Conservation Act is sought under section 42(4)(e) of the FTAA. This section addresses the information requirements of section 43(3)(e) of the FTAA and clause 3 of Schedule 6.

9.1 Description of Proposed Activity (Schedule 6, clause 3(1)(a))

SLL seeks a DOC concession on behalf of QLDC to construct, install, operate, maintain and access a new public water supply pipeline within the DOC-administered Kawarau River Marginal Strip. The pipeline forms part of the wider public water supply network required to service both the Project and the TPLM growth area. It will connect the Shotover Country Borefield to the existing QLDC water supply network. Once constructed, the pipeline will be vested in QLDC, with the associated easement to be registered in favour of QLDC.

The concession sought includes approval for the physical works required to install the pipeline and the grant of an easement across the Marginal Strip to provide for the ongoing occupation, operation, maintenance, repair, renewal and replacement of the pipeline infrastructure. SLL will

be responsible for the construction and installation of the pipeline, with ongoing ownership and responsibilities to be confirmed through vesting and easement arrangements with QLDC.

9.2 Location of Proposed Activity (Schedule 6, clause 3(1)(b))

The proposed activity will occur within the DOC-administered Kawarau River Marginal Strip, legally described as Crown Land Block III Shotover Survey District, adjacent to the Shotover River.

The proposed 560mm diameter watermain will extend from the Shotover Country Borefield to the existing 450mm watermain at SH6 near the eastern end of the Shotover Bridge. The alignment generally follows the Twin Rivers Trail before crossing approximately 106m of the Kawarau River Marginal Strip, which is located between two existing unformed legal road corridors located to the west of Old School Road. Refer to **Figure 32** which shows the location of the proposed water pipeline.



FIGURE 32. WATER SUPPLY PIPELINE SHOWN IN BLUE. GREY SHADING = ROAD RESERVE. SOURCE: GRIP MAPS.

9.3 Alternative Locations and Conservation Areas (Schedule 6, clause 3(1)(c))

Clause 3(1)(c) of Schedule 6 requires information about whether the proposed activity could reasonably be undertaken in another location, another conservation area, or another part of the conservation area where adverse effects would be significantly less.

The proposed water supply pipeline forms a critical component of the infrastructure required to service the Project and the wider TPLM growth area. A range of alignments were considered during development of the Project and the associated water supply strategy.

The preferred alignment includes a crossing of approximately 106m of the Kawarau River Marginal Strip between two existing unformed legal road corridors. The alignment was selected to avoid existing infrastructure within the Old School Road corridor, and will establish an appropriate connection between the Shotover Country Borefield and the existing QLDC water supply network. Alternative alignments would require greater disruption to existing infrastructure.

The Applicant is not aware of an alternative location, conservation area, or part of the conservation area that would achieve the same infrastructure outcome while resulting in materially lower adverse effects.

Accordingly, the proposed alignment is considered appropriate for the purposes of this concession application.

9.4 Consistency with Conservation Management Documents (Schedule 6, clause 3(1)(d))

Clause 3(1)(d) of Schedule 6 requires an assessment of consistency with relevant conservation management strategies and conservation management plans, including documents prepared jointly with Treaty settlement entities.

The relevant conservation management document is the Otago Conservation Management Strategy 2016 (CMS).

9.4.1 Otago Conservation Management Strategy 2016

The CMS provides the statutory framework for the management of public conservation lands and waters within the Otago region. It describes the conservation values present in Otago and provides a vision, objectives, outcomes, policies and milestones to guide the DOC's management of those values.

Of particular relevance to this Project are the CMS outcomes and policies that seek to protect natural character, freshwater values, recreational opportunities and public conservation land from inappropriate development.

A small portion of the Project is located within public conservation land, comprising marginal strip adjoining the Shotover River. Works within this area are limited to the installation of an underground water supply pipe. The proposed pipe will replace an existing undersized watermain and will form part of the wider reticulated water supply network servicing the

surrounding area. Following installation, the infrastructure will be vested with QLDC and operate as public infrastructure.

The works do not involve the construction of permanent above-ground structures within the marginal strip and will not result in any long-term loss of public access, recreational opportunities, or conservation land. Once construction is complete, the ground surface will be reinstated and the watermain will remain entirely below ground.

Potential adverse effects are limited primarily to temporary construction-related disturbance associated with excavation within the marginal strip, vegetation clearance (where required), ground disturbance, noise and the potential generation of sediment-laden runoff. These effects have the potential to affect the natural values of the marginal strip and water quality within the Shotover River if not appropriately managed.

To address these risks, the extent of disturbance within the marginal strip will be limited to that necessary for installation of the watermain, with erosion and sediment control measures implemented throughout construction. Disturbed areas will be reinstated following completion of the works and any temporary effects on public access will cease once construction is complete.

Given the limited extent of works within the marginal strip, the temporary nature of construction effects, the underground nature of the infrastructure, and the reinstatement of the affected area following construction, the Project is not expected to result in any long-term adverse effects on the natural character, recreation values, conservation values, or public access functions of the conservation land.

Furthermore, the Project will provide upgraded public water supply infrastructure for the wider area through replacement of an existing undersized watermain. Accordingly, the Project is considered consistent with the outcomes and policies of the CMS which seek to protect conservation values while providing for appropriate activities and infrastructure where adverse effects are avoided, remedied or mitigated.

9.5 Consistency with Purpose, Status, Ownership and Administration of the Land (Schedule 6, clause 3(1)(f))

Noting Clause 3(1)(e) is not relevant, Clause 3(1)(f) of Schedule 6 requires an assessment of the extent to which the proposed activity is in keeping with the purpose for which the land is held and its status, ownership and administration.

The affected land comprises marginal strip administered by DOC under the Conservation Act 1987. Marginal strips are intended to protect conservation values while providing for public access along waterways and the maintenance of natural functioning and ecological values.

The Project involves a buried public water supply pipeline crossing a relatively limited section of the marginal strip. Once construction is complete and the area reinstated, the pipeline will not be visible from the surface and public access and recreational use of the marginal strip can continue.

The Project will not result in the alienation of conservation land, prevent DOC from continuing to administer the land for its existing purposes, or materially compromise the conservation,

recreation or access functions of the marginal strip. The Project is therefore considered compatible with the purpose, status, ownership and administration of the affected land.

9.6 Potential Effects and Proposed Management Measures (Schedule 6, clause 3(1)(g))

Clause 3(1)(g) of Schedule 6 requires a description of the potential effects (positive and negative) of the proposed activity, any actions that the applicant proposes to take to avoid, remedy, mitigate, offset, or compensate for any adverse effects of the proposed activity, and details of the type of concession for which the applicant is applying. This information is set out below.

Assessment of Effects

The proposed easement is required to enable the installation, operation, maintenance, repair, renewal and replacement of a public water supply pipeline across approximately 106 metres of the Kawarau River Marginal Strip. The pipeline will form part of the wider public water supply network and once constructed, will be vested in QLDC. The easement will formalise the ongoing occupation of the land by the below-ground infrastructure and provide for access where required for future maintenance and operational purposes.

The effects of the proposed easement are expected to arise primarily during the construction phase, when temporary earthworks, pipe laydown and reinstatement works will be undertaken. Once the pipeline has been installed and the land reinstated, the ongoing effects of the easement are anticipated to be limited, as the pipeline will be located underground and will not require permanent above-ground structures.

Effects on conservation values

The Kawarau River Marginal Strip is public conservation land administered by DOC. The proposed works will be confined to the minimum area necessary to install the pipeline and will be located between two unformed legal road corridors.

Lizard habitat was assessed within the Kawarau River Marginal Strip via the LHAs within **Appendix P**. A Wildlife Approval is also being sought through this application, with the recommended mitigation and management to be undertaken in accordance with an LMP as informed by a lizard survey, assessed within the Wildlife Approval application in Section 10.

Any effects on indigenous fauna, including lizards, will be managed through the proposed LMP and associated Wildlife Approval.

Effects on public access and recreation

The Marginal Strip provides for public access and recreation along the Shotover River and Kawarau River corridors. Any effects will be temporary in nature being limited to the construction period, and can be appropriately managed through construction signage, temporary fencing, safe access arrangements, and clear communication of any temporary restrictions.

Following completion of the works and reinstatement of the land, the easement is not expected to materially restrict ongoing public access or recreational use of the Marginal Strip. Any future maintenance access is expected to be infrequent and short in duration, and would be undertaken by, or on behalf of, QLDC in accordance with the terms of the easement and any relevant access or health and safety requirements.

Earthworks, sediment and reinstatement effects

Earthworks associated with installing the pipeline will involve trench excavation, pipe placement, backfilling, compaction and reinstatement. These activities have the potential to generate temporary construction effects such as dust, noise, vibration, sediment runoff and soil disturbance. All such effects will be short-term and confined to the construction footprint.

Construction activities will be managed through standard best-practice measures outlined in the Substantive Application, including stabilised access points, erosion and sediment controls, dust suppression, appropriate storage and handling of excavated material, and prompt reinstatement of disturbed areas. Reinstatement will return the affected land to a condition consistent with its pre-works state, or to a standard agreed with DOC, including recontouring, topsoil replacement, re-establishment of groundcover or vegetation, and removal of surplus material and construction debris. These requirements will be enforced through the recommended conditions of consent contained within **Appendix Y**.

Operational and ongoing easement effects

The ongoing effects associated with the easement are expected to be low. The easement will authorise the occupation of the Marginal Strip by public water supply infrastructure and enable QLDC to undertake inspection, maintenance, repair, renewal and replacement as required. These activities are anticipated to be infrequent, small-scale and limited to the pipeline corridor.

Following reinstatement, the Marginal Strip will continue to function for conservation, access and recreation purposes. The underground installation of the pipeline ensures that no permanent above-ground infrastructure will affect public use or the open character of the strip.

Adverse effects and mitigations

Potential adverse effects relate primarily to temporary construction activities, including vegetation disturbance, earthworks, visual change, construction noise and general construction activity. These effects will be short-term, localised and managed through established construction controls, including erosion and sediment management, dust control, construction traffic management, reinstatement requirements and protocols for working within the Marginal Strip. These requirements will be enforced through the recommended conditions of consent contained within **Appendix Y**.

The underground installation of the pipeline is the key mitigation measure, avoiding permanent visual or physical effects and ensuring that the Marginal Strip's recreational and conservation values are maintained.

Potential effects on indigenous lizards arising from habitat disturbance will be addressed through the separate Wildlife Act Approval sought as part of this application. An LMP will be implemented to guide pre-works surveys, capture and handling procedures, temporary holding and relocation,

and any required habitat management. These measures ensure that any lizards encountered during works are managed by suitably qualified personnel and that effects on protected wildlife are minimised in accordance with the Wildlife Act Approval.

The pipeline forms part of the wider public water supply network required to service the Project and the TPLM growth area. Upon completion, the watermain will vest in QLDC, ensuring long-term public management and maintenance and delivering enduring infrastructure benefits. The adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

Details as to type of Concession

The Applicant seeks an easement concession to authorise the construction, installation, operation, maintenance and access of a public water supply pipeline within DOC-administered marginal strip land adjoining the Shotover River. The duration of the easement will be for the life of the asset and any and all other required concession approvals if identified through the substantive process.

Potential Positive Effects

The proposed concession will enable the delivery of essential public water supply infrastructure required to service the Project and support the wider TPLM growth area. The pipeline forms part of a broader package of infrastructure upgrades that will facilitate planned urban growth, improve servicing capacity, and support the efficient delivery of infrastructure in a strategically identified development area.

By enabling secure water supply infrastructure, the concession will directly support the delivery of rental homes and contribute to increased housing supply, housing choice and wider urban growth outcomes within Queenstown.

The works will also support public health and wellbeing by providing safe and reliable water supply infrastructure for future residents and the wider community.

The concession will also contribute to broader community and economic benefits by enabling the efficient servicing of a large-scale residential development, supporting construction activity, facilitating long-term residential occupation, and bringing forward infrastructure that will serve the wider growth area.

Type of Concession Sought

The Applicant seeks an easement concession under the Conservation Act 1987 authorising the construction, operation, maintenance, repair, replacement and continued use of a public water supply pipeline within the marginal strip.

9.7 Proposed Duration of the Concession (Schedule 6, clause 3(1)(h))

Clause 3(1)(h) requires the proposed duration of the concession and reasons for that duration.

The Applicant (on behalf of QLDC) seeks an easement concession for the duration of the lifetime of the pipeline.

The proposed duration reflects the long-term operational life of the public water supply infrastructure and the ongoing need to access, maintain, repair, replace and operate the pipeline. Given the permanent nature of the infrastructure and its role in servicing the Project and wider growth area, a long-term concession is considered appropriate.

9.8 Applicant Suitability and Relevant Information (Schedule 6, clause 3(1)(i))

Clause 3(1)(i) requires information relevant to the Applicant's suitability to undertake the proposed activity.

SLL is the Applicant and developer of the Project. The Applicant has engaged a team of suitably qualified and experienced planners, engineers, ecologists, landscape architects and other technical specialists to design and implement the Project and associated infrastructure works.

The Applicant has the financial and organisational capacity necessary to undertake the proposed works and to comply with any conditions imposed through the fast-track approvals process and associated concession, a Capability Statement is included within **Appendix B**.

To the Applicant's knowledge, neither the Applicant nor any company director, trustee, partner or person associated with this application has been convicted of an offence relevant to this concession application or has any current criminal charges pending before a court.

9.9 Easement Request and Section 81 Assessment (Schedule 6, clause 3(1)(j))

Clause 3(1)(j) requires reasons for the easement and information demonstrating that granting an easement is appropriate under section 81. Section 81 is discussed in Section 13.5.1 and Section 13.5.2 below.

The Applicant seeks an easement concession to authorise the construction, operation, maintenance, repair, renewal and replacement of the proposed public water supply pipeline.

An easement is the most appropriate concession mechanism because the infrastructure is permanent and located underground. The easement will provide the legal rights necessary to access, operate and maintain the pipeline while allowing the land to remain available for public access, recreation and conservation purposes.

An easement is sought because the proposed activity involves permanent underground infrastructure requiring ongoing legal rights of access, maintenance, operation, repair and replacement.

The easement is considered appropriate because:

- the infrastructure is linear in nature;
- occupation of the land will be minimal;
- the land will remain available for public use;
- no buildings are proposed;
- the effects are localised and manageable; and

- the easement provides the most efficient mechanism for securing long-term infrastructure rights.

9.10 Consultation (Schedule 6, clause 3(1)(k))

Clause 3(1)(k) requires full details of consultation undertaken with relevant iwi and with reserve owners and managers.

Consultation undertaken in relation to the Project is summarised in Section 12 of this application and is detailed further in the Consultation Report (**Appendix U**). This consultation included engagement with Aukaha, Te Ao Mārama, Ngāi Tahu and Brett Ellison on behalf of the relevant iwi authorities, hapū and Treaty settlement entities for the seven Papatipu Rūnaka, together with consultation with the DOC as the manager of the affected marginal strip land.

9.11 Financial and Legal Liabilities (Schedule 6, clause 3(1)(l))

Clause 3(1)(l) requires information relating to financial and legal obligations associated with the land. The Applicant acknowledges that the concession holder will be responsible for complying with all concession conditions and any associated financial obligations arising from the concession.

The Applicant will be responsible for the construction and installation of the pipeline and associated reinstatement works. Following vesting, responsibility for the ongoing operation, maintenance, repair, renewal and replacement of the public water supply infrastructure will rest with QLDC in accordance with the easement and any associated legal arrangements.

The Applicant acknowledges that the concession holder will be responsible for meeting any financial, legal, maintenance, access, reinstatement or other obligations associated with the concession area and authorised activities.

9.12 Local Authority Reserve Owner Approval (Schedule 6, clause 3(1)(m))

Clause 3(1)(m) requires approval from the owner of any reserve land where the affected land is owned or managed by a local authority. This clause is not applicable to the Project. The affected land comprises Crown Land marginal strip administered by DOC and is not reserve land owned or managed by a local authority.

9.13 Rights of First Refusal and Rights of Return (Schedule 6, clause 3(1)(n))

Clause 3(1)(n) requires confirmation that the Applicant has written agreement from the holder of a right of first refusal, right of offer, or right of return to waive that right where:

- the proposed lease would be for a term (including renewals) that will, or is likely to, exceed 50 years; and
- granting the lease would trigger the applicable right.

We do not understand SLL to be seeking a concession which would trigger a right of offer or return.

10 WILDLIFE ACT APPROVALS (UNDER SECTION 42(4)(H))

10.1 Overview

A Wildlife Approval that would otherwise be sought under the Wildlife Act is sought under section 42(4)(h) of the FTAA. This section covers the required information under section 43(3)(g) and Schedule 7, clause 2.

As outlined in the Fast-track referral application process and ongoing consultation, DOC advised that Wildlife Act Approval may be required if any handling, disturbance, or incidental harm to protected fauna cannot be ruled out. A precautionary allowance was therefore made in relation to the wider site, with cautionary inclusion within the referral application.

To support this process, Wildlands Consultants Limited (Wildlands) were engaged to assess the potential for lizard habitat values associated with the proposed water supply pipeline works within the Kawarau River Marginal Strip. An initial LHA authored by Lucian Funnell, identified limited areas with potential to support indigenous lizards within parts of the proposed pipeline corridor. Following this a more detailed LHA was commissioned, authored by Cameron Thorpe, which investigated habitats within the wider Site. Both LHAs are attached as **Appendix P**.

Although potential habitat was only initially identified in relation to the pipeline works, and then later extended to the wider Site, SLL has adopted a precautionary and conservative approach and seeks a Wildlife Approval that applies across the entire Project area. This reflects both DOC's advice and the understanding that, while the likelihood of lizard presence is low, indigenous lizards may occur elsewhere within the Project footprint. Seeking approval now ensures a consistent and legally robust framework is in place to manage any lizards encountered during construction activities.

As identified within **Appendix P** the LHA authored by Cameron Thorpe, the species considered most likely to be present, is the McCann's skink (*Oligosoma maccanni*), which is classified as Not Threatened under the New Zealand Threat Classification System, with a lower likelihood of Southern grass skink (*Oligosoma chinochloescens*).

Recommendations within the LHA authored by Cameron Thorpe include:

- Undertaking lizard surveys within potential lizard habitats to determine the lizard species present, distributions, and relative abundances throughout the site.
- Preparation of an LMP to manage effects to lizards within the Kawarau River Marginal Strip, and subject to the lizard survey above, to manage effects on lizards in the remaining development area.

These recommendations have been endorsed through this assessment, noting the future LMP will detail the methodology for protection during the works period, including pre-construction checks, methods for capture, handling, temporary holding and relocation, and procedures to minimise the risk of incidental mortality.

This Wildlife Approval application therefore seeks authorisation for the capture, handling, temporary holding and relocation of indigenous lizards that may be encountered during construction activities, together with any incidental injury or mortality that may occur despite

implementation of appropriate avoidance and mitigation measures. For the avoidance of doubt, this application does not relate to indigenous birds or bats.

10.2 Proposed Activity and Wildlife Actions (Schedule 7, clause 2(1)(a) and (b))

Clause 2(1)(a) of Schedule 7 of the FTAA requires the application to specify the purpose of the proposed wildlife-related activity, while clause 2(1)(b) requires identification of the actions sought to be carried out involving protected wildlife and the locations where those actions will occur.

The purpose of the Wildlife Approval sought is to enable construction, operation and maintenance of the Project, while minimising injury and mortality to indigenous lizards by enabling their salvage and relocation prior to, and during, vegetation clearance, earthworks and associated habitat removal.

Although likely lizard habitat was only identified within the proposed water supply pipeline corridor, a precautionary approach is adopted and the Wildlife Approval is sought across the entire Project area. This then facilitated an updated the updated LHA, which identified and qualified the habitat within the main Project area. This ensures that any indigenous lizards encountered during construction activities can be managed consistently and in accordance with the proposed LMP.

To achieve this purpose, SLL seeks a Wildlife Approval to capture, handle, temporarily hold and relocate indigenous lizards, and to provide for any incidental injury or mortality that may occur despite the implementation of appropriate avoidance and mitigation measures. These activities may occur anywhere within the Project area where indigenous lizards or suitable habitat are identified, including areas associated with residential development, earthworks, transport infrastructure, three waters infrastructure, landscaping works, and works within the Kowarau River Marginal Strip. Where it relates to lizard management, as informed by the LHA, all activities will be undertaken in accordance with the future LMP, and under the supervision of suitably qualified ecologists where required.

10.3 Purpose of the Wildlife Act (Schedule 7, clause 2(1)(c))

Clause 2(1)(c) of Schedule 7 of the FTAA requires an assessment of the activity and its impacts against the purpose of the Wildlife Act. While the Wildlife Act does not contain an express purpose provision, its long title states that it is:

“An Act to consolidate and amend the law relating to the protection and control of wild animals and birds, the regulation of game shooting seasons, and the constitution and powers of acclimatisation societies”

The Project has been designed to minimise adverse effects on indigenous lizards through the development of the LMP and associated ecological management measures.

Rather than resulting in unmanaged effects on protected wildlife, the approval will provide a framework for ecological management and oversight of the works. Accordingly, the Project is considered consistent with the purpose of the Wildlife Act.

10.4 Protected Wildlife Species in the Area (Schedule 7, clause 2(1)(d))

Clause 2(1)(d) of Schedule 7 requires identification of the protected wildlife species present, or likely to be present, within the affected area.

Based on the information currently available, the lizard species identified or considered likely to be present within the affected area are included within **Figure 33** below.

Species	Common Name	National Threat Status ¹	Regional Threat Status ²	Likelihood
<i>Oligosoma maccanni</i>	McCann's skink	Not Threatened	Regionally Not Threatened	Highly likely – appropriate habitat on site and widespread in the region
<i>Oligosoma chionocholescens</i>	Southern grass skink	At Risk – Declining	Regionally Declining	Possible – appropriate habitat on site but patchily distributed in the region

FIGURE 33. TABLE OF LHA POTENTIAL LIZARD SPECIES PRESENT AT THE TPLM DEVELOPMENT AREA.
SOURCE: LHA AUTHORED BY CAMERON THORPE ATTACHED AS APPENDIX P.

Further details regarding habitat values, survey findings and species presence are provided in within the appended LHAs.

10.5 Impacts on Threatened, Data Deficient, and At Risk Wildlife Species (Schedule 7, clause 2(1)(e))

Clause 2(1)(e) of Schedule 7 requires the application to identify impacts on threatened species, data deficient species or at-risk wildlife. No species within these categories have been identified as likely to occur within the Project area. However, for completeness, it is acknowledged that such species could possibly be present, noting the Southern grass skink is characterised as “At Risk - Declining”.

Potential effects on indigenous lizards may arise through vegetation clearance, earthworks and trenching activities associated with installation of the proposed water supply pipeline.

Although the most suitable habitat is limited to the assessed pipeline corridor, SLL has adopted a precautionary approach, with a LMP currently in preparation for the pipeline corridor, and if required by the lizard survey, will extend to other areas of the Site to manage any indigenous lizards that may be encountered elsewhere during construction.

While areas with potential to support indigenous lizards have been identified within parts of the Project area, the extent of this habitat is limited and does not comprise large or high-quality habitat. Based on the information currently available, implementation of the proposed LMP is expected to appropriately manage any potential effects on indigenous lizards that may be present within the Site.

10.6 Best Practice Standards (Schedule 7, clause 2(1)(f))

Clause 2(1)(f) of Schedule 7 requires identification of best-practice standards. The LMP will apply recognised ecological best practice, including DOC's *Key principles for lizard salvage and transfer* and the recommendations in the Lizard Habitat Assessment, which state that "the LMP should follow the principles outlined by DOC... [including] ways to avoid lizards and their habitats... assessment of alternatives... and an Incidental Discovery Protocol."

The LMP will set out procedures for habitat assessment, ecological supervision, progressive vegetation clearance, capture and salvage, handling and temporary holding, relocation, monitoring, reporting, and management of incidental mortality. These procedures will be informed by the proposed lizard survey and tailored to the species, location, quantity and sensitivities of any lizards present, noting that surveys must occur between October and March "during warm, calm and dry weather conditions" to ensure accuracy.

All wildlife management activities will be undertaken by suitably qualified and experienced ecologists in accordance with recognised best practice to ensure effects on indigenous lizards are appropriately avoided, minimised and managed.

10.7 Methods to Manage Wildlife and Animal Ethics Processes (Schedule 7, clause 2(1)(g))

Clause 2(1)(g) of Schedule 7 requires the application to identify the methods proposed to manage wildlife.

The primary management tool will be the implementation of a LMP prepared by a suitably qualified ecologist. The LMP details the methodology for protection during the works period. This will include methods for capture, handling, temporary holding, and relocation of lizards, and procedures to manage and minimise the risk of incidental mortality.

The LMP will be developed for the Kowarau Marginal Strip, and will apply across additional areas of the Project area should the lizard survey necessitate it. This approach recognises that indigenous lizards may occur outside currently identified habitat areas and ensures that consistent management procedures apply wherever suitable habitat is encountered during construction, as informed by the lizard survey. The project-wide approach also provides a single framework for ecological management, monitoring and reporting throughout the construction phase.

10.8 Location of the Activity (Schedule 7, clause 2(1)(h))

In accordance with the recommendations of the Lizard Habitat Assessment, a lizard survey will be undertaken within all areas of identified potential lizard habitat across the development site, as well as within the pipeline alignment, to determine the lizard species present and their distribution and relative abundance. The survey will be undertaken during the recognised lizard survey season (October to March) and in suitable weather conditions. The findings of the survey will inform the preparation of the Lizard Management Plan, ensuring that any management and mitigation measures are proportionate to the ecological values identified.

Accordingly, wildlife management activities may occur anywhere within the Project area in the unlikely scenario that indigenous lizards are encountered during construction activities. This includes residential development areas, earthworks, transport infrastructure, three waters infrastructure, landscaping works and works within the Kowarau River Marginal Strip.

Refer to **Figure 34** for the location of the proposed works.

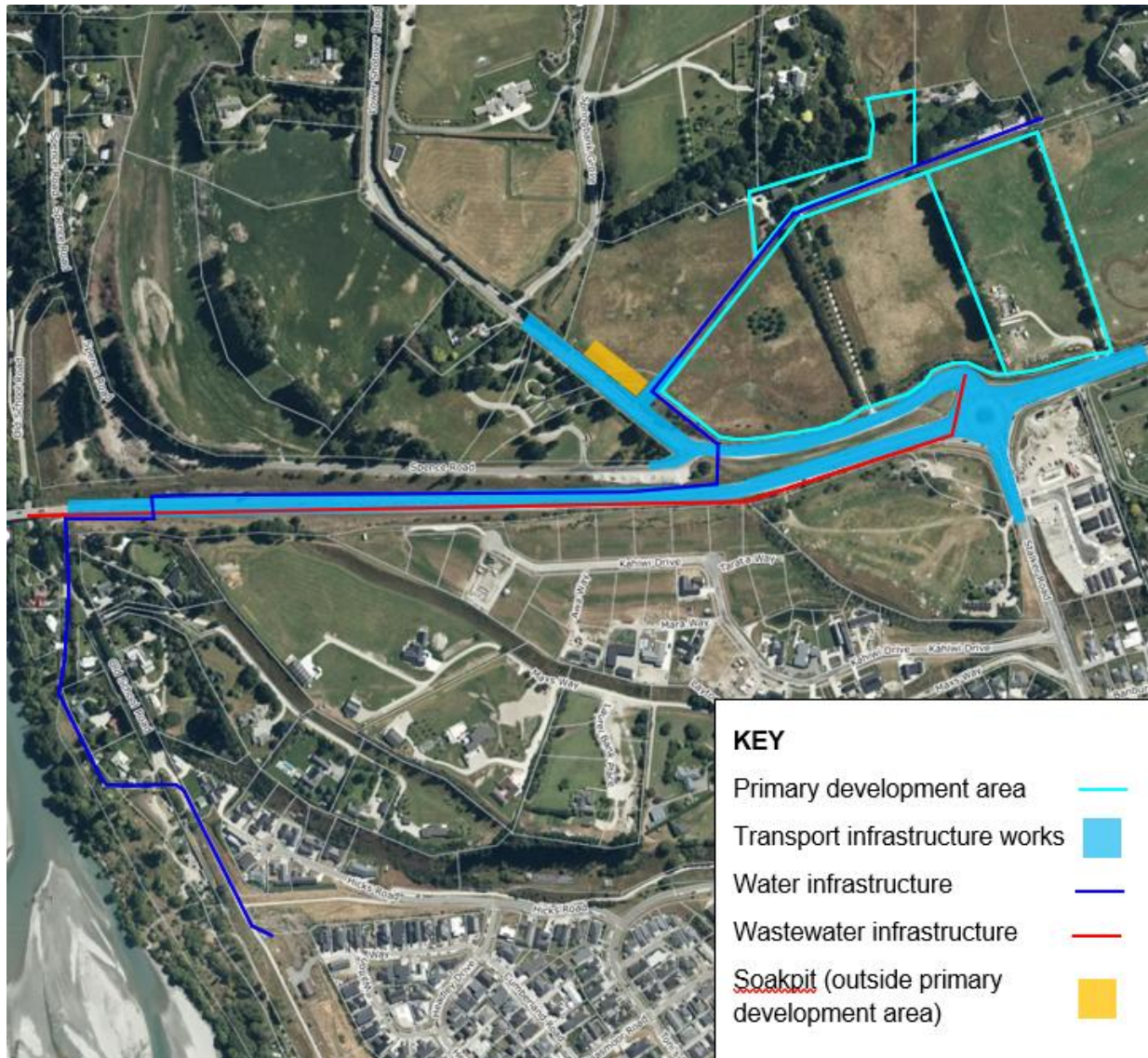


FIGURE 34: EXTENT OF WORKS. SOURCE: GRIP MAPS

10.9 Holding and Relocation of Wildlife (Schedule 7, clause 2(1)(i))

Clause 2(1)(i) of Schedule 7 requires the application to identify any arrangements for holding and relocating wildlife.

Where indigenous lizards are encountered during authorised salvage activities, they may be captured and temporarily held by a suitably qualified and experienced ecologist before being relocated to suitable habitat. Temporary holding will occur only for the minimum period necessary to safely relocate captured individuals and will be undertaken in accordance with recognised ecological best practice and the requirements of the LMP.

The specific methodologies for capture, temporary holding, relocation and post-relocation management will be set out in the final LMP.

10.10 Assessment of Effects (Schedule 7, clause 2(1)(j))

Clause 2(1)(j) of Schedule 7 requires an assessment of the actual and potential effects of the proposed activity on protected wildlife.

Earlier fast-track referral material noted that no ecological survey had been undertaken and that the likelihood of lizard presence within the narrow pipeline construction corridor was considered low. The Substantive Application now benefits from a detailed LHA undertaken by Wildlands for the Kawarau River Marginal Strip. This assessment identifies a small, discrete area of potential lizard habitat associated with the exotic Mexican orange hedge and adjacent garden/grass areas between two neighbouring properties. In addition the LHA provide a high level assessment of the remainder of the site which this Wildlife Approval extends to due to the advice of DoC where the presence of lizards cannot be ruled out. The focus of this assessment is in relation to the Kawarau Strip area, however as assessed below the wider site will be subject to similar mitigation measures should a lizard survey demonstrate that requirement.

Based on the LHA, construction activities associated with trenching and vegetation clearance may interact with this narrow strip of potential habitat if the final pipeline alignment cannot avoid it. In that circumstance, effects on indigenous lizards could occur through disturbance, habitat modification, injury, or incidental mortality. SLL has therefore adopted a precautionary approach consistent with DOC advice that Wildlife Act Approval may be required where handling, disturbance, or incidental harm cannot be ruled out.

The areas within potential lizard habitat along the Kawarau Marginal strip are included below within **Figure 35**.

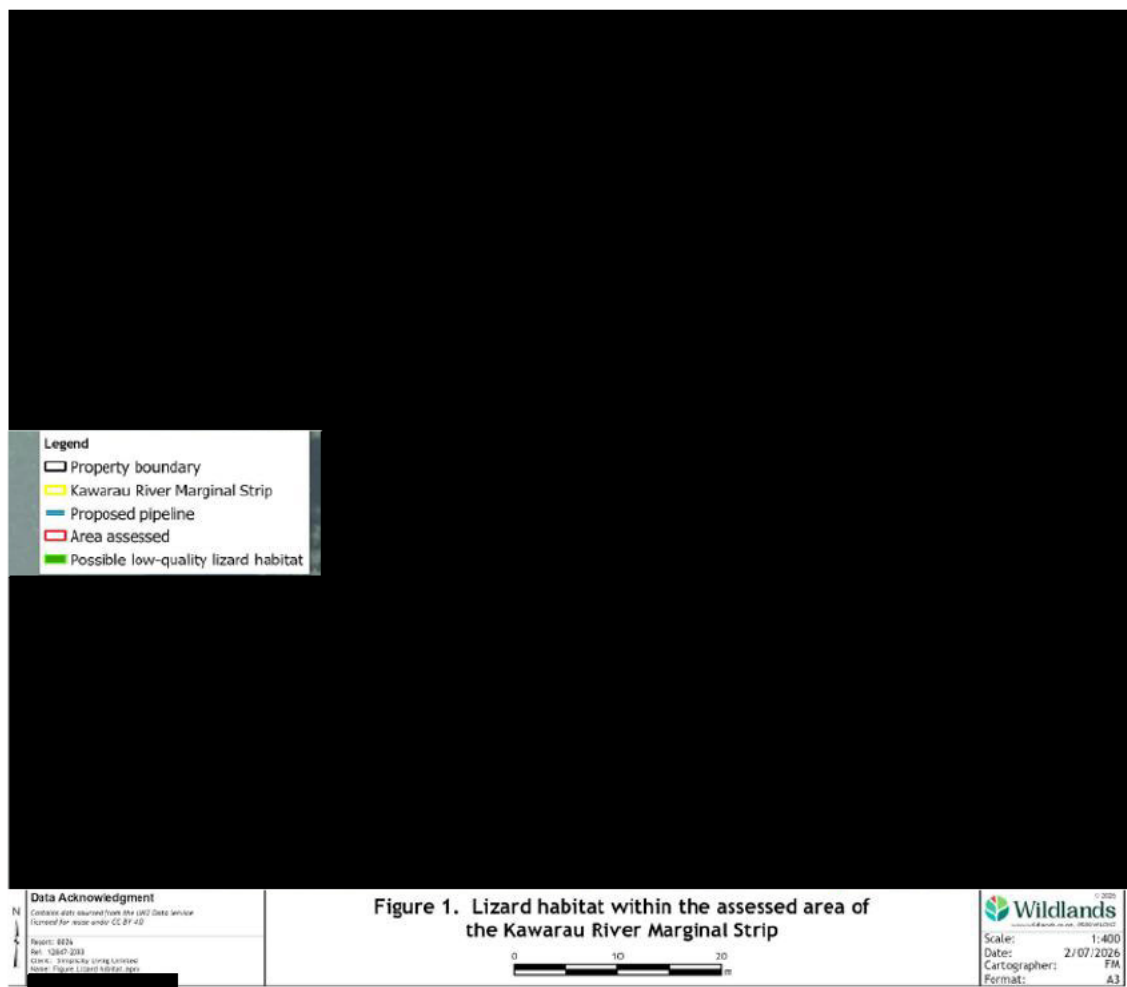


FIGURE 35. LIZARD HABITAT WITHIN THE KAWARAU RIVER MARGINAL STRIP. SOURCE: LHA ATTACHED AS APPENDIX P

Potential adverse effects of the proposed activity include:

- Disturbance of indigenous lizards during vegetation clearance and earthworks
- Temporary or permanent modification of small areas of potential habitat
- Injury to lizards during trenching or vegetation removal
- Incidental mortality despite implementation of management measures

Both LHA confirms that these effects can be appropriately managed through implementation of the LMP. The LMP follows DOC's *Key Principles for Lizard Salvage and Transfer in New Zealand* (Lizard Salvage Key Principles) and will be updated if lizards are detected elsewhere within the Project area.

Both LHAs identifies a narrow strip of potential lizard habitat within the Kawarau River Marginal Strip, consisting of the exotic Mexican orange hedge and adjacent garden/grass areas between two neighbouring properties. This is the only location where works associated with the pipeline installation may interact with potential habitat. Lizard management measures, implemented through the LMP, are proposed to appropriately manage any effects.

The LHA also notes that the remaining development areas assessed (the wider Project footprint beyond the Marginal Strip) contain modified environments with limited lizard habitat values.

These areas comprise residential gardens, managed grass, and disturbed ground, which are likely to result in a compromised habitat for indigenous lizards. As a result, the likelihood of lizard presence outside the Marginal Strip is considered lower. Should pre-construction surveys detect lizards in any of these areas, the LMP would be updated to incorporate appropriate management responses.

Recommended management approach

Wildlands recommend that a lizard survey be undertaken within potential lizard habitats to inform the LMP to ensure consistent and proportionate management of any lizards encountered during works. The LMP is currently being prepared for the pipeline footprint within the marginal strip, and will be updated if lizards are detected in any of the other development areas following lizard surveys. The LMP will follow DOC's Lizard Salvage Key Principles, which outline the steps required to achieve effective lizard management, including assessing lizard values at both impact and release sites and identifying the actual and potential effects of the works.

The LMP will include avoidance measures wherever practicable, consideration of alternatives to salvage, and an Incidental Discovery Protocol for lizards encountered during earthworks. Seasonal guidance will also be incorporated, recognising that surveys and salvage (if required) are most effective between October and March.

If salvage is determined to be the appropriate mitigation option, progressive habitat reduction would be undertaken in a staged manner, including:

1. Cutting grass, hedge and vegetation to 20–30cm and removing loose material by hand
2. Reducing vegetation to 10cm and removing loose material by hand
3. Removing remaining vegetation completely

These measures align with DOC's 2019 Lizard Salvage Key Principles.

Effects Conclusion

Relying on the LHA and Wildlands' recommendations, any potential adverse effects on indigenous lizards can be appropriately managed through the implementation of the LMP. The LMP will provide a clear and structured framework to avoid, minimise, and mitigate effects, and will be certified and implemented as a condition of consent. This ensures that any lizards encountered during construction are managed in accordance with DOC's Lizard Salvage Key Principles, including appropriate handling, salvage (if required), and where possible relocation to suitable habitat within the Project area.

Should salvage be required, lizards captured within the works area would be relocated to suitable habitat within the same property (where possible), consistent with DOC's established guidance. The combination of avoidance measures, progressive habitat reduction, and relocation procedures is intended to minimise adverse effects and ensure appropriate protection and management of indigenous lizards during construction.

Accordingly, the proposed wildlife activities align with the purpose of the Wildlife Act 1953 by ensuring that indigenous lizards are appropriately protected, potential impacts are minimised, and suitable management responses are in place throughout the construction period. Based on

the above it can be concluded that effects are less than minor in regards to any lizards present within the development area, specifically aligning with the purpose of the Wildlife Act. In this regard, any adverse effects will be avoided or mitigated such that there will not be any significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

10.11 Avoid, Minimise, Offsetting and compensation of Effects (Schedule 7, clause 2(1)(k))

Clause 2(1)(k) of Schedule 7 requires the application to identify measures proposed to avoid, minimise, remedy, offset or compensate for adverse effects on protected wildlife.

These measures are detailed above and within the LHAs attached as **Appendix P**.

10.12 Offences and Criminal Charges Under the Wildlife Act (Schedule 7, clause 2(1)(l) and (m))

In accordance with clause 2(1)(l) and clause 2(1)(m) of Schedule 7 of the FTAA the Applicant or any company director, trustee, partner, or anyone else involved with the application has not been convicted of any offence under the Wildlife Act 1953 and the applicant or any company director, trustee, partner, or anyone else involved with the application does not have any current criminal charges under the Wildlife Act 1953 pending before a court.

10.13 Consultation (Schedule 7, clause 2(1)(n))

Clause 2(1)(n) of Schedule 7 requires proof and details of all consultation undertaken in relation to the protected wildlife that may be affected by the Project.

Consultation undertaken in relation to the Project is summarised in Section 12 of this application and detailed further in the Consultation Report (**Appendix U**). This consultation included engagement with Aukaha, Te Ao Mārama, Ngāi Tahu and Brett Ellison on behalf of the relevant iwi authorities, hapū and Treaty settlement entities for the seven Papatipu Rūnaka, together with consultation with DOC, being the relevant administering agency for approvals under the Wildlife Act 1953.

Feedback received through this engagement has informed the Project's development, including the refinement of ecological management measures and cultural considerations. Ongoing engagement will continue as the Project progresses into detailed design and implementation to ensure that iwi, hapū, Treaty settlement entities, and DOC remain appropriately involved.

10.14 Expert views, advice and opinions (Schedule 7, clause 2(1)(o))

The Applicant has obtained expert ecological advice from Wildlands, who prepared the LHAs and is preparing the LMP for the Project.

The findings and recommendations of those assessments have informed the preparation of this Wildlife Approval application, including the identification of potential effects on protected wildlife

and the development of the proposed avoidance, mitigation and management measures, management framework, and recommended Wildlife Approval conditions.

PART 3 – INTEGRATED ASSESSMENT

11 PROPOSED CONDITIONS

In accordance with clause 5(1)(k) and clause 18 of Schedule 5, clause 8 of Schedule 6, and clause 6 of Schedule 7 of the FTAA, proposed conditions are provided for the resource consent, concession and Wildlife Approval sought.

The conditions have been developed having regard to the technical assessments accompanying this application and are intended to ensure that the Project's actual and potential effects are appropriately managed.

Proposed conditions for the resource consent, concession and Wildlife Approval are attached as **Appendix Y**.

11.1 Management Plans

The Project will be implemented and managed in accordance with a suite of management plans prepared by suitably qualified professionals which will be certified by the relevant consent authority (QLDC / ORC) or administering bodies (DOC). These plans will provide detailed measures to avoid, remedy, or mitigate actual and potential adverse effects arising from the Project. The management plans proposed for the Project are listed in **Table 7**.

TABLE 7: MANAGEMENT PLANS

<i>Plan</i>	<i>Certification Required</i>
Environmental Management Plan	QLDC / ORC
Erosion & Sediment Control Plan	QLDC / ORC
Construction Noise & Vibration Management Plan	QLDC
Traffic Management Plan	QLDC
Lizard Management Plan	DOC
Landscape Design Drawings	QLDC (assets to vest)

12 CONSULTATION

SLL has undertaken ongoing consultation with relevant stakeholders since late 2025 in relation to the development of the Site and the Project. A detailed summary of consultation undertaken is provided in the Consultation Report attached as **Appendix U**.

In relation to the Project, the Applicant has consulted and engaged with:

- QLDC and ORC as the relevant local authorities.
- Aukaha, Te Ao Mārama, Ngāi Tahu and Brett Ellison on behalf of the relevant iwi authorities, hapū and Treaty settlement entities for the seven Papatipu Rūnaka; and

- the DOC and Heritage New Zealand Pouhere Taonga as the relevant administering agencies.
- the NZTA
- the Ministry of Education
- Neighbouring Landowners

This consultation has informed the development of the Project, including the design of the proposed development, servicing strategy and the scope of the supporting technical assessments accompanying this application.

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

The Applicant has obtained written approvals from the northern neighbouring landowner, (Lot 2 DP 606744, 30 Lower Shotover Road), in relation to access, earthworks and stormwater infrastructure interfaces. The Applicant has also obtained written approval from the southern neighbouring landowners, (Section 5 SO 485598 and Lot 4 DP 325561, 12 Stalker Road), in relation to potential interface effects between the proposed developments, including building height and shading effects. Copies of these approvals are included in the Consultation Report attached as **Appendix U**.

The Project has also been subject to extensive public scrutiny through the recent TPLM Plan Variation rezoning process, including submissions and hearings on the future urban development of the area. To this end, the urban development outcomes across the residential development area have been considered at length, including any actual or potential effects on the surrounding environment (including impacts on directly adjoining properties).

Overall, the consultation undertaken has assisted in refining the Project and ensuring it responds to infrastructure, transport, environmental, cultural and community considerations, resulting in a more integrated and resilient development outcome.

13 ASSESSMENT OF THE PROJECT AGAINST THE FTAA

13.1 Overview

The Project has been referred by the Minister for Infrastructure as a referred project under section 21 of the FTAA. In making that referral decision, the Minister determined that the Project met the statutory referral criteria under the FTAA, including that it has the potential to deliver significant regional or national benefits. While the Panel must undertake its own assessment of the application, the referral decision confirms that the Project has already been identified as having the potential to advance the purpose of the Act.

This section addresses the Project against the relevant requirements and decision-making framework of the FTAA. It considers the requirements for Substantive Applications under section 43, the circumstances in which an approval must or may be declined under section 85, and the approval-specific matters relevant to the resource consent, concession and Wildlife Approval sought. The assessment demonstrates that the Project is consistent with the purpose of the FTAA, satisfies the applicable statutory requirements, and delivers significant regional and national benefits that support approval of the application.

13.2 Use of Specified Act to Apply for Approval (s94)

Section 94 of the FTAA provides that a person must withdraw an application for an approval under a specified Act where a Substantive Application seeks a corresponding approval under the FTAA for the same, or substantially the same, activity.

The Applicant is separately progressing district resource consent application RM260566 and regional resource consent application RM26.282 for earthworks internal to the residential development, specifically within Lot 3 DP 606744, Section 9 SO 485598 and Lot 2 DP 617529.

The activities applied for under resource consent applications RM260566 and RM26.282 are not included within this Substantive Application. While this application includes earthworks, the works proposed as part of this application are solely associated with earthworks external to the residential development, i.e. all earthworks outside of Lot 3 DP 606744, Section 9 SO 485598 and Lot 2 DP 617529. This includes earthworks for the construction and upgrades to the transport infrastructure, water supply, wastewater, stormwater and other infrastructure required to service the Project.

Accordingly, this Substantive Application does not seek a corresponding approval for the same, or substantially the same, activity as RM260566 and RM26.282. In addition, the concession approval and Wildlife Approval sought through this Substantive Application are not the subject of any separate approval process. Therefore, the approvals sought through this application do not duplicate any other live approval application relating to the Project.

13.3 Requirements for Substantive Applications (s43)

13.3.1 Consistency with the Purpose of the FTAA (s43(1)(b))

Assessment of the Project against the purpose of the FTAA is to be given the most weight by the Panel in accordance with section 17(1)(a).

The purpose of the FTAA is *“to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.”*

“Significant regional or national benefits” is not specifically defined in the FTAA. However, section 22(2)(a) of the FTAA provides guidance on the matter and provides criteria, the most relevant to this application having been included below:

whether the project—

- will increase the supply of housing, address housing needs, or contribute to a well functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):*
- will deliver significant economic benefits:*
- is consistent with local or regional planning documents, including spatial strategies:*

The Project will substantially increase housing supply and directly address identified housing needs within the Queenstown Lakes District. It will deliver approximately 1,085 long-term rental homes, predominantly one- and two-bedroom units, representing the equivalent of 4.7 years of recent rental stock growth combined. The Economic Impact Assessment confirms that secure rental accommodation is in critically short supply and that the Project will materially improve housing choice, affordability and stability. By providing professionally managed build-to-rent housing at scale, the Project supports labour-market retention, improves access to employment, and contributes to a well-functioning urban environment in accordance with Policy 1 of the NPS-UD. Accordingly, the Project is considered to clearly meet the criterion relating to increasing housing supply, addressing housing needs, and contributing to a well-functioning urban environment.

The Project will also deliver significant economic benefits. The Economic Impact Assessment identifies \$461 million in direct construction and development expenditure and a total economic impact of \$919 million NPV nationwide, including \$110 million in GDP value added retained within the Queenstown Lakes District. Construction activity is estimated to support approximately 3,050 FTE years of employment, meaning the total labour demand over the construction period is equivalent to 3,050 full-time worker-years. Employment will fluctuate over the construction period, with the peak workforce reaching approximately 860 FTEs locally in 2029, representing more than 2% of the district’s employment base. Approximately 40% of all economic activity and employment benefits are retained within the district, representing over 4% of the local economy during peak construction. Longer-term benefits include 40-50 permanent FTEs in property management and maintenance, improved labour-market retention, and an

estimated \$381 million NPV in social value over 35 years. On this basis, the Project is assessed as delivering significant economic benefits at a regional scale.

The Project is consistent with local and regional planning documents, including spatial strategies. The site is located within the Te Pūhahi Ladies Mile Zone, a strategic growth area identified for residential development in district and regional planning frameworks. The land has been rezoned for urban development and is anticipated to accommodate substantial housing capacity. The Project gives effect to this zoning by delivering housing at scale and bringing forward infrastructure upgrades that support the wider Ladies Mile growth area. The Economic Impact Assessment notes that Queenstown Lakes District accounts for a substantial share of Otago's GDP, employment and population, meaning that a development significant at the district scale is inherently significant at the regional scale. Accordingly, the Project is considered to be fully consistent with relevant local and regional planning documents and spatial strategies.

Overall, the scale and nature of the Project's housing, economic and infrastructure outcomes demonstrate that it will deliver significant regional benefits in the sense anticipated by the FTAA. The Project provides a substantial and immediate uplift in rental housing supply, directly addressing documented housing shortages and contributing to a well-functioning urban environment. It generates regionally significant economic activity, employment and long-term social value, with benefits retained predominantly within the Queenstown Lakes District. The Project also gives effect to established spatial planning directions by progressing development within a strategic growth area and bringing forward supporting infrastructure upgrades.

Taken together, these outcomes clearly meet the threshold of "significant regional or national benefits" and align directly with the purpose of the FTAA, which is to facilitate the delivery of infrastructure and development projects that produce such benefits. The Project therefore represents the type of development the FTAA is expressly designed to enable.

13.3.2 Ineligible Activities (s43(1)(c))

The project does not involve any activities identified as ineligible activities under the FTAA.

13.3.3 Multiple Authorised Persons (s43(1)(d))

The Substantive Application has been lodged by a single authorised person, being SLL. Accordingly, section 43(1)(d) does not apply.

13.3.4 Ministerial Information Requirements (s43(1)(e)(i))

In accordance with section 43(1)(e)(i) a Substantive Application must include any information requirements specified by the Minister under section 27(3)(b)(ii).

The decision on the referral application (attached as **Appendix A**) specified the following matters must be submitted with the Substantive Application for the Project:

3. *Pursuant to section 27(3)(b)(ii), the following information must be submitted with the substantive application lodged for the project:*
 - a. *an assessment of the relevant three waters infrastructure that includes, but is not limited to:*
 - i. *the existing condition and capacity of that infrastructure;*

- ii. any upgrades to that infrastructure required in connection with the subdivision and development;
- iii. any funding required to carry out those upgrades, including who will provide that funding;
- iv. details of ongoing ownership and maintenance responsibilities; and
- v. information on any discussions held, and any agreements made, between the authorised person and the relevant infrastructure provider/s about the relevant infrastructure (including discussions and agreements about the matters referred to in items (i) to (iv) above)
- b. an integrated transport assessment that includes, but is not limited to:
 - i. details of any upgrades required to the surrounding road, pedestrian, or cycle network, including pedestrian crossings;
 - ii. how those upgrades would be funded; and
 - iii. information on any discussions held, and any agreements made, between the authorised person and the relevant infrastructure provider/s about the necessary upgrades (including discussions and agreements about the matters referred to in items (i) and (ii) above)
- c. an assessment of the project's consistency with the requirements of the Water Conservation (Kawarau) Order 1997.

The specific matters identified in the referral decision have been addressed as follows:

Three Waters Infrastructure

Existing condition and capacity of three waters infrastructure

Water Supply: QLDC GIS shows a 150 mm principal main south of the Stalker Road roundabout. There is also an existing 63mm lateral in an adjacent site. A new water reservoir (RL407 m) east of the site is already consented under RM230721, intending to service the entirety of the TPLM zone, forming part of the existing environment and will be delivered by the neighbouring developer.

Wastewater: QLDC GIS main, shows the public network is approximately 6.0m the site located on the southern side of State Highway 6. Two mains 150mm and 300mm, located in the same location, convey flows west, to the Shotover WWTP. The existing 300 dia. rising main on the southern side of the State Highway is run at half capacity intermittently due to the degraded condition of the network in the eastern corridor. Existing peak wet weather flows (PWWF) for the wider catchment already exceed 212 L/s, and future combined flows (including Ladies Mile) are projected to reach 349.9 L/s, requiring upgrades.

Stormwater: The site currently has no reticulated stormwater network. Stormwater management will rely on soak pits, swales, and overland flow paths, with a designated stormwater discharge location for flows exceeding the 100-year event.

Upgrades to infrastructure required

Water Supply Upgrades:

Two external upgrades are necessary to service the development.

The first stage requires the installation of rising main from the eastern side of the Shotover Bridge to the eastern edge of the site. The second stage requires the installation watermain from

the Shotover Country Borefield to the eastern end of the Shotover Bridge. The internal development will be serviced by a proposed public ring main around the site.

All water supply infrastructure within the development extent with the exception of the proposed ring main is proposed to be privately owned and operated.

SLL are proposing to deliver (consent and construct) all the infrastructure with the exception of the infrastructure east of the site consented under RM230721 that will be delivered by the neighbouring developer.

Wastewater Upgrades:

A new 450mm public main is proposed to extend along SH6 to connect east of Shotover Country Bridge, with a proposed duplicate 450mm main on the western side discharging to the WWTP surge tank. These works are to be delivered in two stages, as detailed in the Ladies Mile Wastewater Analysis by Water Acumen (included within **Appendix L**).

Stage 1 comprises the 450mm main along SH6, providing 180 L/s capacity and servicing 722 Dwelling Unit Equivalents (DUE) (1,085 units within the Site) plus 360 DUEs along Ladies Mile. Stage 2 comprises the 450mm main from the western abutment of Shotover Country Bridge to the WWTP, increasing capacity to 239 L/s and enabling a further 1,306 DUEs (1,666 DUEs within Ladies Mile and 722 DUEs within Simplicity total).

While Stage 1 upgrades are considered sufficient based on the current assessment, Stage 2 has been included within the proposed consent to provide flexibility should further network capacity upgrades be required. The requirement for Stage 2 works will be confirmed during the Engineering Approval process detailed design and development agreement for proposed staged trunk upgrades.

Stormwater Upgrades:

The Civil Infrastructure Report and engineering drawings show the installation of new stormwater mains, soak pits, swales, and stormwater treatment devices. A new stormwater discharge location for flows exceeding the 100-year event.

Funding required for upgrades, including who will provide that funding:

SLL will deliver (consent and construct) all proposed water supply infrastructure except the reservoir and associated pipework consented under RM230721 (delivered by neighbouring developer).

SLL will also deliver (consent and construct) all wastewater infrastructure except the Stage 2 external upgrade, which is being consented to safeguard future requirements.

A Development Agreement between QLDC and SLL is in progress to facilitate delivery of external trunk infrastructure.

Details of ongoing ownership and maintenance responsibilities

Water: All internal water supply reticulation will be privately owned and operated by SLL. The public rising main, public falling/ring main, and reservoir will be QLDC-owned.

Wastewater infrastructure:

Stage 1 external trunk infrastructure will be delivered by SLL but ultimately vested in QLDC.

Stage 2 external upgrade is being consented but not delivered by SLL at this stage.

Stormwater: Internal stormwater devices (soak pits, swales) will be privately owned. Public stormwater mains and discharge structures will vest in QLDC.

Information on discussions and agreements with infrastructure providers

Engagement with QLDC Property and Infrastructure team has occurred throughout preliminary design. A Developer Agreement is in progress between QLDC and SLL for external trunk water and wastewater infrastructure.

ORC acknowledges ancillary three waters works outside the site and has reviewed preliminary information.

Integrated Transport Assessment Requirements

Upgrades required to surrounding road, pedestrian, or cycle network

As identified within the ITA, the following upgrades are proposed:

- Construction of a signalised intersection at SH6 with Stalker Road and Lower Shotover Road,
- Construction of a westbound bus lane between Stalker Road and the Shotover River bridge,
- Installing new bus stops on SH6,
- A new crossing over Lower Shotover Road to Spence Road providing an active travel connection between the Site,
- A new intersection of Lower Shotover Road with Spence Road as a priority-controlled T intersection,
- A new signalised intersection of Lower Shotover Road with the east west collector including pedestrian (and cycle) crossings over Lower Shotover Road.

How those upgrades would be funded

As outlined within the Economic Assessment, SLL will fund and deliver external transport infrastructure upgrades.

Discussions and agreements with transport infrastructure providers

The following engagement has been undertaken:

- Engagement with QLDC and Waka Kotahi through the Ladies Mile modelling process.

- Ongoing engagement with QLDC Property and Infrastructure team regarding external works.
- Engagement with ORC regarding public transport provision.

Project's consistency with the requirements of the Water Conservation (Kawarau) Order 1997.

The Project is located on the upper terrace above the Kawarau River and does not involve any works within the Kawarau or Shotover Rivers, their margins, or beds. No damming, diversion, abstraction, or channel modification is proposed, and all three-waters servicing is provided through reticulated networks and land-based stormwater management. Stormwater is treated and discharged via on-site soakage systems and designated overland flow paths, with no direct discharge to protected waters.

Although a short section of water supply pipeline is proposed within the Kawarau River Marginal Strip, this work is confined to the terrestrial reserve area, does not enter the riverbed, and does not alter flows, water quality, or any protected characteristics of the Kawarau River under the Order.

As a result, the Project does not affect the water quality, natural character, recreational values, scientific values, or cultural values protected under the Order, and the associated infrastructure upgrades fall within permitted network utility activities.

Overall, the Project is assessed as being consistent with the Water Conservation (Kawarau) Order 1997.

13.3.5 Approval-Specific Information Requirements (s43(1)(e)(ii))

The application includes the information required by the FTAA for each approval sought.

13.3.6 Determinations under Sections 23 or 24 (s43(1)(f) and (g))

The Applicant has not applied for, nor obtained, a determination under sections 23 or 24 of the FTAA. Accordingly, sections 43(1)(f) and (g) do not apply.

13.3.7 Priority Projects (s43(1)(h))

The application does not relate to a priority project therefore section 43(1)(h) does not apply.

13.3.8 Lodgement Timeframe (s43(1)(i))

This Substantive Application has been lodged within the timeframe specified in the referral decision (being 2 years) issued under section 28(3)(d) of the FTAA.

13.3.9 Fees, Charges and Levies (s43(1)(j))

All fees, charges and levies payable in relation to the Substantive Application will be paid in accordance with the FTAA and any applicable regulations.

13.4 Competing Applications or Existing Resource Consents for Same Activity (s47A)

13.4.1 Competing Applications

ORC and QLDC confirmed in their comments on the referral application lodged by SLL that they are not aware of any competing applications for this Substantive Application.

13.4.2 Existing Consents for Same Activity (s30)

In accordance with section 30(2) of the FTAA, on 12 June 2026 formal notice was given to ORC that the authorised person intended to lodge a Substantive Application for the referred project: Simplicity Living – Te Pūtahi Ladies Mile. ORC subsequently provided a letter in accordance with section 30(3) of the FTAA, confirming that there are no existing resource consents of the kind contemplated by section 30(3)(a). This letter is attached as **Appendix CC**.

Since then, a resource consent application was lodged by the Applicant with ORC and QLDC to consent earthworks within the residential development area. It is confirmed that this consent is not for the same activity as applied for under this fast-track application and therefore no conflict arises.

13.5 The FTAA Decision Making Framework

In determining whether to grant the approvals sought, the Panel must apply the decision-making framework set out in the FTAA. This includes the requirements of section 81 and the approval-specific criteria in Schedules 5, 6 and 7.

A key component of that framework is section 85, which sets out the circumstances in which an approval must or may be declined. In addition, section 81(4) requires the Panel, when considering the purpose of the FTAA, to have regard to the extent of the Project's regional or national benefits.

The assessment below first addresses section 85, before considering the relevant approval-specific criteria.

13.5.1 Declining an approval under Sections 85(1) and 85(2)

Section 85 of the FTAA sets out circumstances where the Panel must, or may, decline an approval application.

Under section 85(1), the Panel **must** decline an approval if any of the following circumstances apply:

- (a) the approval is for an ineligible activity;*
- (b) the panel considers that granting the approval would breach section 7:*
- (d) in the case of an approval described in section 42(4)(c) (certificate of compliance), the approval must be declined under clause 27 of Schedule 5:*

- (e) in the case of an approval described in section 42(4)(e) (concession), the approval must be declined under clause 7(3) of Schedule 6:*
- (f) A panel must decline an approval described in section 42(4)(a) (resource consent) for any area for which the approval must not be granted under clause 17(5) of Schedule 5.*

In addition, under section 85(2), the Panel must decline a resource consent approval for any area for which consent must not be granted under clause 17(5) of Schedule 5.

None of the circumstances in sections 85(1) or 85(2) apply to the Project, for the following reasons:

- The application does not seek approval for an ineligible activity as defined in section 5 of the FTAA.
- The assessment of Treaty settlements matters in Section 4.3 confirms that granting the approvals sought would be consistent with obligations arising under existing Treaty settlements. Therefore, granting the approval would not breach section 7 FTAA.
- The certificate of compliance is made under the relevant district plan (the PDP), and is assessed as a permitted activity. There is no notice for the activity in force under section 87BA(1)(c) or 87BB(1)(d) of the RMA
- The certificate of compliance relates to activities that are permitted under the Operative Regional Plans. There is no notice in force under sections 87BA(1)(c) or 87BB(1)(d) of the RMA that would prevent the certificate from being issued.
- The concession approval does not relate to reserve land owned or managed by a local authority, does not involve a lease term exceeding 50 years, and would not trigger any applicable right of first refusal.
- Clause 17(5) of Schedule 5 does not apply to the resource consent approvals sought, as the application does not include a coastal permit for aquaculture activities.

Accordingly, there are no mandatory grounds for decline under section 85(1) or 85(2).

13.5.2 Declining an approval under Sections 85(3) and 85(4)

Under section 85(3), the Panel may decline an approval if, in complying with section 81(2), it forms the view that:

- (a) there are 1 or more adverse impacts in relation to the approval sought; and*
- (b) those adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits that the panel has considered under section 81(4), even after taking into account—*
 - (i) any conditions that the panel may set in relation to those adverse impacts; and*
 - (ii) any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.*

As outlined in Section 8 (Assessment of Effects on the Environment) the Project's potential adverse effects have been comprehensively addressed through the proposed design responses, management plans, and consent conditions. Having regard to section 85(3), the Panel is required to consider whether any adverse impacts remain and, if so, whether they are sufficiently significant to be out of proportion to the Project's regional benefits after accounting for all avoidance, remediation, mitigation, offsetting, or compensation measures.

Based on the technical assessments provided, any residual adverse impacts are limited in scale and will be managed through the proposed conditions and agreed measures. When weighed against the Project's substantial regional benefits, including materially increasing housing supply, improving long-term rental availability, supporting a well-functioning urban environment, and delivering significant economic and social wellbeing outcomes, the residual adverse impacts do not reach a level of significance that would outweigh the significant regional benefits of the Project.

There will be no significant impacts of the Project and no adverse effects sufficiently significant to outweigh the significant regional benefits. In subsections (3) and (4), adverse impact means any matter considered by the Panel in complying with section 81(2) that weighs against granting the approval.

For these reasons, there is no basis for the Panel to decline the approvals sought under section 85 of the FTAA.

13.6 Criteria and Other Matters for Consent Application (Schedule 5, clause 17)

Clause 17 of Schedule 5 outlines that when considering a consent application and setting conditions, the Panel must take into account the following, giving the greatest weight to (a):

(a) the purpose of this Act; and

(b) the provisions of Parts 2, 3, 6, and 8 to 10 of the Resource Management Act 1991 that direct decision making on an application for a resource consent (but excluding section 104D of that Act); and

(c) the relevant provisions of any other legislation that directs decision making under the Resource Management Act 1991.

This means the Panel must give the greatest weight to the purpose of the FTAA which is: to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

The reference to Part 2 excludes section 8 of the RMA and the reference to Part 6 excludes section 104D of the RMA.

Clause 18 of Schedule 5 outlines that Parts 6, 9 and 10 of the RMA relevant to setting conditions on a resource consent apply to the Panel.

The Project is assessed under each limb of clause 17 below

13.6.1 Part 2 of the RMA

This section of the application is provided in accordance with clauses 5(1)(g) and 17 of Schedule 5 of the FTAA.

Part 2 contains the purpose and principles of the RMA. Section 5 sets out the purpose of the RMA and requires a broad judgement as to whether a proposal would promote the sustainable management of natural and physical resources. This exercise of this judgment is informed by the principles in sections 6 to 7 and considered in light of the particular circumstances of each application.

As the effects of the Project are considered to be consistent with all of sections 5, 6, and 7 of the RMA, and the Project accords with the relevant objectives and policies of the District and Regional Plans, it is considered that the Project will not offend against the general resource management principles set out in Part 2 of the RMA. Further assessment against these sections is provided below.

13.6.1.1 Section 5

Section 5 of Part 2 identifies the purpose of the RMA as being the sustainable management of natural and physical resources. This means managing the use, development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

It is considered that the proposed development is complementary to these objectives as it will provide for the social and economic well-being of people and communities by increasing expenditure, employment and income within the local economy and provide capacity for 1,085 new, healthy homes to assist with Queenstown Lakes District and the region's housing supply. The following assessments demonstrate that the development will be appropriately managed and carried out in a manner that will not give rise to significant adverse environmental effects.

In addition to the above, the Project will further enhance social and economic wellbeing through SLL's build-to-rent model, which delivers secure tenure, professionally managed homes, and long-term affordability for residents. As a vertically integrated developer, builder and long-term owner, SLL removes inefficiencies typical of traditional development models, enabling cost savings and more predictable delivery programmes. These efficiencies support lower rents, improved housing stability, and high-quality maintenance outcomes over the life of the development. The build-to-rent model also generates sustained economic activity through ongoing property management, local employment, and continuous reinvestment in community facilities and shared spaces. By providing 1,085 well-located, long-term rental homes at scale, the Project will materially contribute to a more resilient, accessible and affordable housing market in the Queenstown Lakes District, strengthening both social and economic wellbeing across the community.

13.6.1.2 Section 6

Section 6, Part 2 of the RMA lists the matters of national importance.

Subclauses 6(a), (c), (d) and (f) are not relevant as there are no wetlands, lakes, rivers, significant indigenous vegetation, significant habitats of indigenous fauna coastal marine areas or historic heritage features on the Site.

The Project recognises and provides for those relevant matters as follows:

6(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:

The LEA attached as **Appendix F** confirms the Site is not located within an ONF or ONL. As discussed in the LEA, the Project will not result in direct effects on any ONF or ONL. Potential indirect effects on the appreciation of these values, including views toward Slope Hill, are appropriately managed through the masterplanned layout, maintaining views to the upper slopes and skyline whilst also incorporating a range of viewshafts north / south across the development site and between buildings.

6(e) The relationship of Māori and their culture and traditions

Ongoing engagement has been undertaken with iwi partners throughout the project, as outlined in the Consultation Report and specifically Attachment D within **Appendix U**. Engagement has focused on ensuring iwi are kept informed of project development, with opportunities provided for feedback at key stages.

Input received to date has contributed to refinements in areas such as stormwater management, earthworks planning, and landscape integration, particularly where these intersect with cultural values and environmental considerations. Matters relating to Te Mana o te Wai, landform modification, and appropriate construction protocols have been discussed, and this feedback has been incorporated where relevant into the project's design and assessment framework.

The project team will continue to engage with mana whenua as the development progresses, ensuring that cultural considerations remain appropriately recognised and provided for in accordance with section 6(e).

6(g) The protection of protected customary rights

No protected customary rights have been identified within or adjacent to the Site. No recognised customary marine title or planning documents are applicable to the Project area.

6(h) The management of significant risks from natural hazards

The Geotechnical Report prepared by ENGEO (**Appendix N**) and the Civil Engineering Infrastructure Report (**Appendix L**) both confirm that the residential development area is subject to low natural hazard risk. The investigations identify no significant geotechnical or flooding constraints that would prevent development, and any residual risks can be appropriately managed through detailed design.

The reports outline standard engineering responses for earthworks, foundations, and stormwater management, all of which can be secured through consent conditions to ensure safe implementation. On this basis, natural hazard risks are considered to be low and able to be effectively mitigated through the proposed design and construction controls.

13.6.1.3 Section 7 – Other Matters

Section 7 of the RMA identifies a number of “other matters” to be given particular regard to and includes (but is not limited to) Kaitiakitanga, the efficient use of natural and physical resources, the maintenance and enhancement of amenity values, and maintenance and enhancement of the quality of the environment. The Project is considered to be consistent with the matters in section 7. The location presents an ideal opportunity for residential development and has been earmarked as a strategic urban growth area. It thereby allows for an efficient and logical area for medium to high density residential use. The development can be supported by existing infrastructure networks or will provide the necessary upgrades to facilitate an efficient land use outcome. The Project enables and facilitates the development of a residential neighbourhood that will not compromise the visual amenity of the environment and will mitigate effects on natural water resources.

13.6.2 Part 3 of the RMA: Duties and Restrictions

Part 3 of the RMA relates to the duties and restrictions under the RMA, with particular regard to use of land, subdivision, discharge of contaminants, uses of beds of rivers, and contravention of designations. It is considered that the Project meets Part 3 of the RMA because:

- The Project seeks resource consent to provide for land use activities and discharges under sections 9, 11, 12, 13, 14 and 15.
 - Construction noise and vibration effects have been assessed in **Appendix H**. The draft CNVMP provided demonstrates that there are a range of specific methods available for managing noise and vibration on the surrounding environment. As a result, section 16 of the RMA has been complied with.
- As has been set out in the earlier sections of this AEE, the development has been designed to minimise effects on the natural environment, and any effects that remain are proposed to be managed through a comprehensive suite of conditions. As a result, section 17 of the RMA has been complied with.

Part 6 of the RMA: Resource Consents

Part 6 contains the principal statutory framework for considering resource consent applications and includes provisions relevant to discharges and subdivision. The relevant sections in Part 6 are addressed below.

Section 104

The primary decision-making section applying to resource consents is section 104 of the RMA. A comprehensive assessment against the relevant factors of section 104 has been undertaken above. In short, it concludes that the resource consent approvals sought are consistent with all of the planning instruments to which regard must be had and the effects on the environment have been assessed, alongside the design features and measures proposed by SLL to avoid, remedy, mitigate, and compensate those effects.

Section 105

Section 105 requires consideration of the nature of the discharge, the sensitivity of the receiving environment, the reasons for the proposed discharge method, and alternative discharge options.

These matters have been assessed through the civil engineering, stormwater, and infrastructure reports accompanying the application. The proposed discharge characteristics, treatment approach, and disposal pathways have been evaluated against the capacity and sensitivity of the receiving environment, confirming that the effects can be appropriately managed.

The assessments conclude that the proposed discharge method is suitable for the site conditions, represents an appropriate engineering response, and that practicable alternatives have been considered. Any residual effects can be effectively addressed through the recommended consent conditions, ensuring compliance with section 105.

Section 106

Section 106 provides a basis for refusing subdivision consent where significant natural hazard risks exist or where legal and physical access cannot be achieved for all allotments.

The supporting geotechnical, engineering and transport assessments confirm that natural hazard risks are low and can be appropriately managed through standard engineering design and consent conditions. The assessments also demonstrate that suitable legal and physical access can be provided to all proposed allotments.

On this basis, there is no trigger for refusal under section 106.

Section 107

Section 107 places restrictions on granting discharge permits where specified adverse effects may occur, including conspicuous change in colour or clarity, objectionable odour, oil or grease films, or significant adverse effects on aquatic life.

The civil engineering, stormwater, and infrastructure assessments accompanying the application confirm that the proposed discharge activities can be appropriately managed through treatment, attenuation, and standard engineering controls. The assessments do not identify any effects of the type listed in section 107, nor any that would preclude the granting of consent.

Accordingly, the Project does not trigger the restrictions under section 107, and there is no basis within Part 6 to decline the discharge components of the application.

Part 8 of the RMA

Part 8 of the RMA relates to designations and heritage orders. No heritage orders or designations apply to the Site or are proposed, with the exception of SH6 which is designated for State Highway Purposes and the SOC Borefield located within the Kawareau Marginal Strip. This Project is not in conflict with the requirements of Part 8 of the RMA, noting the requiring authority is NZTA and QLDC respectively and the ongoing consultation included within **Appendix U**.

Part 9 of the RMA

Part 9 of the RMA relates to water conservation orders, freshwater farm plans and use of nitrogenous fertiliser. Of these matters, the Water Conservation (Kawarau) Order 1997 is relevant to the Project. The Project includes earthworks, stormwater infrastructure and external water supply works within the wider Shotover River catchment, and therefore consideration has been given to whether the Project could adversely affect the outstanding characteristics and values recognised by the Water Conservation Order.

As assessed in Section 7.4.2.1 of this Application, the Project does not involve the damming, diversion or abstraction of water from the Shotover River and is not anticipated to adversely affect the outstanding amenity and intrinsic values protected by the Order. Construction-related effects will be managed through erosion and sediment control measures, while operational stormwater will be treated and managed through the proposed stormwater infrastructure. Accordingly, the Project is considered consistent with the protections and restrictions contained within the Order.

Freshwater farm plans and the use of nitrogenous fertiliser are not relevant to the approvals sought as part of this Application.

13.6.3 Part 10 of the RMA

Part 10 sets out the framework for subdivision approvals, including the matters to be addressed through conditions and the requirement for clear definition of allotments and boundaries.

The subdivision components of the application have been assessed against these provisions. Proposed conditions have been included to secure the necessary engineering, servicing, easement and certification requirements, and these align with section 220 of the RMA.

All boundaries and allotments are clearly shown on the submitted scheme plans, ensuring compliance with the plan-definition requirements of Part 10.

Accordingly, the subdivision meets the relevant provisions of Part 10 and is capable of being granted subject to the proposed conditions.

13.6.4 Conclusion

Having regard to the relevant decision-making provisions of Parts 2, 3, 6 and 8 to 10 of the RMA, there is no statutory impediment to granting the resource consent approvals sought.

13.6.5 Other Relevant Legislation

No other legislation directing decision-making under the RMA is considered relevant to the resource consent approvals sought. Relevant national direction, regulations and secondary legislation have been addressed throughout this Application.

13.7 Criteria for Assessment of Concession Application (Schedule 6, clause 7)

Clause 7(1) of Schedule 6 outlines that when considering a concession application and setting conditions, the Panel, giving the greatest weight to paragraph (a)(i):

(a) Must take into account-

- a. the purpose of this Act; and*
- b. Part 3B of the Conservation Act 1987 (except sections 17SB and 17U(3) of that Act) as if the application were an application for a concession under Part 3B; and*
- c. any other relevant provisions of Parts 3, 4, 4A, 5, 5B, and 5C of the Conservation Act 1987 that direct decision making in relation to Part 3B of that Act; and*
- d. in the case of an approval referred to in paragraph (a)(ii) of the definition of concession, sections 14, 14A, and 14AA of the Wildlife Act 1953; and*
- e. in the case of an approval referred to in paragraph (a)(iii) of the definition of concession, section 49(2) of the National Parks Act 1980; and*
- f. the purpose for which the land is held (in the case of a Reserves Act approval, taking into account Parts 1, 2, and 3 and section 122 of the Reserves Act 1977); and*
- g. in the case of an approval referred to in paragraph (a)(i) or (ii) of the definition of concession or paragraph (a) of the definition of Reserves Act approval,—*
 - (A) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity; and*
 - (B) the views of the entity referred to in subsub paragraph (A) on the proposed concession; and*
- h. in the case of an approval referred to in paragraph (a)(iii) of the definition of concession,—*
 - (A) any national park management strategy, conservation management strategy, national park management plan, or conservation management plan that has been co-authored, authored, or approved by a Treaty settlement entity; and*
 - (B) the views of the entity referred to in sub subparagraph (A) on the proposed concession; and*
- i. in the case of an approval within paragraph (b) of the definition of Reserves Act approval,—*

- (A) any reserve management plans that have been co-authored, authored, or approved by a Treaty settlement entity; and*
- (B) the views of the entity referred to in subsub paragraph (A) on the proposed concession; and*
- j. the status, ownership, and administration of the land that would be subject to a concession; and*
- k. whether the land is subject to any existing arrangements that create obligations in relation to the land; and*
- l. the legal and financial liabilities associated with decisions on leases, licences to occupy land, and easements:*

(b) may consider,—

- (i) in the case of an approval referred to in paragraph (a) of the definition of concession or paragraph (a) of the definition of Reserves Act approval, any policy statement or management plan of the Crown (other than a strategy or plan referred to in paragraph (a)(vii):*
- (ii) in the case of an approval within paragraph (b) of the definition of Reserves Act approval, any reserve management plan of the administering body (other than a plan referred to in paragraph (a)(ix).*

This means the Panel must give the greatest weight to the purpose of the FTAA which is: to facilitate the delivery of infrastructure and development projects with significant regional or national benefit, which is addressed below.

13.7.1 The Purpose of the FTAA

The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. The proposed concession forms part of the wider Project. The water supply pipeline within the marginal strip is required to support the servicing of the Project and wider urban growth outcomes. The concession is therefore consistent with the purpose of the Act, as it enables essential infrastructure required to support a project with significant housing, infrastructure, economic and social benefits.

13.7.2 Part 3B of the Conservation Act 1987

The proposed concession is to be assessed as if it were an application for a concession under Part 3B of the Conservation Act 1987, excluding sections 17SB and 17U(3). The concession relates to the installation, operation, maintenance and access to an underground public water supply pipeline within DOC-administered marginal strip land adjoining the Shotover River. The activity is limited in nature, will be located underground, and will not materially affect the ongoing use or function of the marginal strip once construction is complete. Subject to appropriate construction, reinstatement and access conditions, the Project is considered capable of satisfying the relevant Part 3B concession considerations.

13.7.3 Other Relevant Provisions of the Conservation Act 1987

The relevant Conservation Act provisions are those that direct decision-making for concessions under Part 3B. The affected land is a marginal strip, which is held for conservation purposes including maintaining public access to waterways and protecting conservation values. The proposed buried water supply pipeline is a compatible form of utility infrastructure in this context, as it will not permanently restrict public access or alter the conservation function of the marginal strip. The Project is therefore not considered inconsistent with the relevant Conservation Act provisions.

13.7.4 Sections 14, 14A and 14AA of the Wildlife Act 1953

This matter is relevant only to an approval referred to in paragraph (a)(ii) of the definition of concession. The concession sought for the water supply pipeline is not a Wildlife Act Approval. Separate Wildlife Approval is being sought for the capture, handling, temporary holding and relocation of indigenous lizards associated with the external water supply infrastructure works. Accordingly, this criterion is not directly applicable to the concession assessment, although the wider application addresses wildlife matters separately.

13.7.5 Section 49(2) of the National Parks Act 1980

This criterion applies only where the approval relates to an activity requiring approval under paragraph (a)(iii) of the definition of concession, being an approval under the National Parks Act 1980. The proposed water supply pipeline is located within DOC-administered marginal strip land and does not involve national park land. Accordingly, section 49(2) of the National Parks Act 1980 is not applicable.

13.7.6 Purpose for which the Land is Held

The land affected by the proposed concession is Crown-owned marginal strip administered by DOC through the Director-General of Conservation. Marginal strips are generally held to protect conservation values, enable public access along waterways, and support public recreation. The proposed pipeline will be buried underground and, following construction and reinstatement, will not materially affect public access to the Shotover River or the conservation values of the marginal strip. The Project is therefore considered compatible with the purpose for which the land is held.

13.7.7 Treaty Settlement Entity-Authored Conservation Management Strategies or Plans

The project area lies within the takiwā of Ngāi Tahu, and the Ngāi Tahu Claims Settlement Act 1998 applies. The Otago Conservation Management Strategy applies to the area, but the Strategy does not identify any specific provisions co-authored, authored or approved by a Treaty settlement entity that would preclude the proposed concession.

13.7.8 Status, Ownership and Administration of the Land

The proposed works involve the installation of an underground public water supply pipeline within that marginal strip. Upon completion, the watermain will vest in QLDC as part of the public

water supply network. The status, ownership and administration of the land have therefore been identified and do not preclude the concession being granted.

13.7.9 Existing Arrangements and Obligations

There are no existing arrangements over the marginal strip that would preclude the concession. Any necessary access, maintenance, reinstatement or infrastructure obligations can be addressed through concession conditions.

13.7.10 Legal and Financial Liabilities

The Applicant acknowledges that the concession holder will be responsible for complying with all concession conditions and any associated financial obligations arising from the concession.

The Applicant will be responsible for the construction and installation of the pipeline and associated reinstatement works. Following vesting, responsibility for the ongoing operation, maintenance, repair, renewal and replacement of the public water supply infrastructure will rest with QLDC in accordance with the easement and any associated legal arrangements.

The Applicant acknowledges that the concession holder will be responsible for meeting any financial, legal, maintenance, access, reinstatement or other obligations associated with the concession area and authorised activities.

13.7.11 Consideration of Other Documents Under Section 7(2)

Clause 7(2) of Schedule 6 requires the Panel to take into account that certain provisions of the Conservation Act 1987 and National Parks Act 1980 would ordinarily require a decision-maker to decline a concession application where it is inconsistent with relevant conservation planning documents. However, the Panel must not treat those provisions as requiring the concession to be declined. Those documents being:

(a) sections 17U(5) and (6) and 17W(1) and (3) of the Conservation Act 1987; and

(b) section 49(2) of the National Parks Act 1980.

The proposed concession relates to the installation of a buried water supply pipe within an existing marginal strip. The Otago Conservation Management Strategy applies to the area; however, no specific provisions have been identified that would preclude the proposed works. Given the limited scale and nature of the activity, and that the pipe will be located underground, the Project is not considered inconsistent with the use, purpose or values of the marginal strip. No other Conservation Management Strategy, Conservation Management Plan, National Park Management Plan or relevant conservation planning document is understood to apply to the subject land. Accordingly, there are no identified conservation planning provisions that would direct refusal of the concession.

13.7.12 Declining an Approval Under Section 7(3)

Section 7(3) of Schedule 6 sets out circumstances where the Panel must decline an application

Under section 7(3), the panel must decline the approval if:

- (a) in the case of an application for an approval referred to in paragraph (b) of the definition of Reserves Act approval where the reserve is owned or managed by a local authority, the panel is not satisfied that the local authority has provided written agreement for the activity to be undertaken on the reserve; or*
- (b) giving effect to the approval would result in the conferral of an interest in land that is incompatible with an existing interest in land; or*
- (c) the granting of the proposed concession would involve a lease for a term (including any renewals) that will, or is likely to, be more than 50 years; and:*
 - (i) the granting of the lease would trigger a right of first refusal or a right of offer or return; and*
 - (ii) the panel is not satisfied that the holder of the right of first refusal or right of offer or return has provided written agreement to waive that right for the purpose of the granting of the lease.*

None of the circumstances in sections 7(3) apply to the Project, for the following reasons:

Clause 7(3) applies only where the relevant activity is to occur on a reserve owned or managed by a local authority. The marginal strip affected by the proposed works is Crown-owned conservation land administered under the Conservation Act 1987 and managed by the DOC. As the land is not owned or managed by a local authority, clause 7(3) is not engaged and local authority reserve owner approval is not required.

The proposed water pipe will not be incompatible with the existing interest in the land. The pipeline will be installed underground and, once constructed, will not materially affect the use or function of the marginal strip. In particular, the works will not impede public access to the waterway or compromise the conservation values that the marginal strip is intended to protect.

We do not understand that any concession required for the Project triggers a right of refusal. However, even if this was a possibility, SLL will not be seeking a concession which would trigger a right of refusal or right of offer or return.

13.8 Criteria for Assessment for Wildlife Approval Application (Schedule 7)

Clause 2 of Schedule 7 to the FTAA sets out the information requirements for applications seeking approval under the Wildlife Act 1953. The required information has been provided in the LHAs (**Appendix P**), which identifies the relevant species, protected lizards, and assesses potential effects arising from the Project.

Clause 5 of Schedule 7 requires the Panel, when considering a Wildlife Approval and any associated conditions, to give greatest weight to the purpose of the FTAA, followed by the purpose of the Wildlife Act and the effects of the Project on protected wildlife, and then any relevant conservation status information. This statutory weighting means that the Panel must primarily consider whether the Project delivers the type of significant regional or national benefits that the FTAA is designed to facilitate.

Within this framework, the LHA confirms that the Project area contains no high-value lizard habitat, no threatened or at-risk species, and no habitat features that would trigger elevated ecological risk. The assessment identifies only low-value, modified habitat within limited parts of the Site, with no evidence of species listed as “Threatened” or “At Risk” under the New Zealand Threat Classification System. As a result, the Project’s effects on protected wildlife are assessed as negligible to minor, and can be appropriately managed through standard construction practices and ecological protocols.

When these ecological findings are considered alongside the statutory weighting in Clause 5, the conclusion is clear: the Project delivers substantial regional benefits, 1,085 long-term rental homes, major infrastructure upgrades, construction employment, and long-term operational investment, while generating no more than minor effects on protected wildlife. The information required under Schedule 7 has been provided, the effects have been robustly assessed, and the Project’s alignment with the purpose of the FTAA carries the greatest weight in the Panel’s decision-making.

Accordingly, the Wildlife Approval sought is appropriate to grant.

14 CONCLUSION

The Substantive Application seeks approvals under the FTAA to enable the comprehensive development of the Project. The Project will deliver a large-scale, purpose-built, build-to-rent residential neighbourhood within a strategic growth area identified for urban development. It will provide 1,085 long-term rental homes supported by community facilities, open space, a local shopping centre, internal movement networks, parking, and associated three-waters and transport infrastructure.

The Project responds directly to Queenstown's well-documented housing pressures by delivering a substantial increase in housing supply and housing choice in a location specifically identified for growth. The build-to-rent model will provide secure, professionally managed rental accommodation for long-term residents, contributing to a broader range of housing options within the Whakatipu Basin.

The Project will also deliver significant regional benefits through major investment in infrastructure, construction activity, employment, and long-term operational management. The proposed infrastructure upgrades will support the development itself and contribute to the wider TPLM growth area, including upgrades to transport, wastewater, water supply, stormwater, and active travel networks. These outcomes align with the purpose of the FTAA, which is to facilitate infrastructure and development projects with substantial regional or national benefits.

The actual and potential adverse effects of the Project have been comprehensively assessed in the application and supporting technical reports. While the Project will generate some adverse effects, including increased pressure on the surrounding transport network, those effects generated by the Project can be appropriately avoided, remedied, mitigated, or managed through the proposed design response, infrastructure upgrades, management plans, and consent conditions. The technical assessments demonstrate that the Project will deliver substantial housing, infrastructure, economic, and community benefits while ensuring adverse effects are appropriately managed. There are no adverse impacts sufficiently significant to be out of proportion to the Project's significant regional benefits.

Particular consideration has been given to transport effects. The Bartlett ITA and DM Consulting peer review confirm that, although increased traffic volumes and delays will occur, the Project includes a significant transport mitigation package that delivers early, tangible improvements to the SH6 corridor and local network. These upgrades, including signalisation, bus priority, active travel links, and intersection improvements, represent a fair and reasonable contribution to the wider TPLM transport programme and materially improve safety, efficiency, and mode choice. The assessments conclude that residual transport effects are not disproportionate when weighed against the scale of public benefit delivered by the Project, especially given the strategic infrastructure provided, the long-term mode shift outcomes anticipated by the Zone, and the substantial housing, economic, and community benefits enabled.

Overall, the Project represents a significant opportunity to deliver much-needed housing and supporting infrastructure within an established strategic growth area. Having regard to the purpose of the FTAA, the relevant statutory assessment matters, the proposed mitigation and conditions, and the substantial regional benefits of the Project, the approvals sought are appropriate for grant.

15 APPENDICES