

File ref: FTAA-2607-1264

3 September 2026

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

Tēnā koe,

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

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

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

Request for Further Information

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

1. Wildlife Approval

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

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

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

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

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

DOC recommended that the following further information be provided:

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

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

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

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

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

Responding to the Request for Further Information

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

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

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

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

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

If you have any questions, please contact Gabby Storey, Application Lead by email at info@fasttrack.govt.nz.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'BB' followed by a horizontal line.

Ben Bond

Team Leader, Fast-track Applications