



FTAA-2603-1203: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 2 decisions

Project Name: Simplicity Living – Te Pūtahi Ladies Mile

Date submitted:	27 May 2026	Tracking #: 26-BRF-01387	
Security level:	In-Confidence	MfE priority:	Urgent

	Action sought:	Response by:
To Hon Chris Bishop, Minister for Infrastructure	Decision on recommendations	4 June 2026

Actions for Minister's Office staff	Return the signed briefing to: FTAreferrals@mfe.govt.nz Approve the attached notice of decisions letter.
Number of appendices: 7	Appendices: 1. Statutory framework for making decisions 2. Application documents for the Simplicity Living – Te Pūtahi Ladies Mile project 3. Stage 1 Briefing Note and decisions 4. Section 18 Report on Treaty settlements and other obligations 5. Section 19 Report on Public Conservation Land 6. Comments received from invited parties 7. Draft Notice of Decisions letter

Ministry for the Environment contacts

Position	Name	Cell phone	1 st contact
Principal Author	Ashley Sycamore		
Manager	Stephanie Frame	s 9(2)(a)	✓
General Manager	Ilana Miller	s 9(2)(a)	

Project location



Image 1: Project location and architectural plans

Key messages

1. This briefing seeks your decisions under section 21 of the Fast-track Approvals Act 2024 (the Act) on the application from Simplicity Living Limited (the applicant) to refer the Simplicity Living – Te Pūtahi Ladies Mile project (the project) to the fast-track approvals process.
2. A copy of the application is in Appendix 2. This is the second briefing on this application. The first briefing (Stage 1 – 26-BRF-01003) with your initial decisions annotated is in Appendix 3.
3. The project is to construct and establish a residential development under a build-to-rent model along Ladies Mile in Queenstown, on approximately 10 hectares of land.
4. The project involves:
 - a. approximately 1,100 residential units, across a mix of three-storey walk-up apartments and five-to-seven storey apartment buildings
 - b. community facilities, including community rooms, indoor recreation and family spaces, open spaces and parks, and onsite car parking (including in buildings)
 - c. local commercial and retail activities
 - d. the provision of new internal roads within the site and upgrades to the external roading network
 - e. the construction of a signalised intersection and bus lane on State Highway 6
 - f. the provision of new, and upgrades to existing, three waters infrastructure, including stormwater management, water supply, and wastewater services, both internal and external to the site
 - g. fee simple subdivision to create development lots, roads, and a park to vest in Queenstown Lakes District Council (QLDC)

- h. unit title subdivision of the walk-up and apartment buildings
 - i. bulk earthworks to facilitate the development internally and externally to the site.
- 5. The project area is located at and adjoining 12 Lower Shotover Road, Queenstown, within the Otago Region, and includes adjacent or nearby land and road reserves required to enable associated transport and three waters infrastructure works.
- 6. The applicant seeks the following approvals via the fast-track approvals process to authorise the project, including some approvals sought at this stage on a precautionary basis, subject to further investigations prior to any substantive application:
 - a. resource consents under the Resource Management Act 1991 (RMA)
 - b. concessions under the Conservation Act 1987
 - c. approvals under the Reserves Act 1977
 - d. wildlife approvals under the Wildlife Act 1953.
- 7. We recommend you **accept** the referral application. We seek your decisions on this recommendation, proposed directions to the applicant and expert panel, and the notification of your decisions.

Assessment against statutory framework

- 8. The statutory framework for your decision-making is set out in Appendix 1. You must apply this framework when you are deciding whether to accept or decline the referral application and when deciding on any further requirements or directions associated with referral of the project.
- 9. Before accepting the project, you must consider the following:
 - a. the application (in Appendix 2)
 - b. the section 18 Treaty settlements report (in Appendix 4)
 - c. the section 19 on the use of public conservation land (in Appendix 5)
 - d. the comments received from invited parties (in Appendix 6).
- 10. Following that, you may accept the application if you are satisfied that it meets the criteria in section 22 of the Act and if there are no reasons meaning you must decline the application. We provide our advice on these matters below.

Section 18 Treaty settlements and other obligations report

- 11. A Treaty settlements and other obligations report (the report) prepared under section 18 of the Act is attached in Appendix 4.
- 12. The report identifies Te Rūnanga o Ngāi Tahu (Ngāi Tahu) and seven Papatipu Rūnanga as relevant Treaty settlement entities, and Aukaha and Te Ao Mārama Incorporated as other Māori groups with interests in the application.
- 13. The Ngāi Tahu Claims Settlement Act 1998 is relevant to the project area. No other obligations such as Mana Whakahono ā Rohe or joint management agreements apply.
- 14. The report notes statutory acknowledgements over Whakatipu-wai-māori (Lake Wakatipu) and Te Wairere (Lake Dunstan). The project area is downstream of Lake Wakatipu and upstream of Lake Dunstan. Other provisions (including deeds of recognition, taonga species,

conservation protocol, and a nohoanga entitlement) are not currently affected, but reflect Ngāi Tahu's connection to the area.

15. Comments received from Kāti Huirapa Rūnaka ki Puketeraki and Ngāi Tahu express concerns about the Shotover River/Kimiākau Wastewater Treatment Plant's capacity to accommodate additional wastewater, noting existing treated discharges are abhorrent to tangata whenua. While not taking a position on referral, both request ongoing, meaningful engagement as the application progresses.
16. The report does not identify any matters indicating the proposed approvals would be more appropriate under another Act or Acts.

Section 16 Effects of Treaty settlements and other obligations on decision-making

17. We have not identified any documents that you must give the same or equivalent effect to, or procedural requirements you must comply with under section 16 of the Act.

Section 19 Report in relation to use of public conservation land

18. As the project area includes public conservation land (PCL), the Director-General of Conservation (DGC) has prepared a report under section 19 of the Act (refer to Appendix 5).
19. The DGC identifies that project infrastructure works (including a replacement water pipe) are proposed within marginal strips associated with the Kawarau River and, potentially, the Shotover River.
20. Both parcels of PCL are held under the Conservation Act 1987 and administered by the Department of Conservation (DOC). No non-Crown owners, administrators, or managers of the affected PCL were identified for the purposes of section 19(3).
21. The DGC notes that these areas of PCL support public access and existing uses, including recreational activities and infrastructure authorised through concessions and easements.
22. The DGC has assessed potential risks and liabilities to the Crown associated with conservation approvals sought and considers these risks to be low.
23. The report does not include any specific recommendations.

Written comments received

24. Comments were received under section 17 from Otago Regional Council (ORC), QLDC, the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development, the Associate Minister of Housing, and the Minister for Economic Growth, DOC, Kāti Huirapa Rūnaka ki Puketeraki, Ngāi Tahu, and the NZ Transport Agency Waka Kotahi (NZTA).
25. The key points of relevance to your decisions are summarised in Table A, with the full comments attached in Appendix 6.
26. A summary of the comments received from Māori groups is provided above. A summary of the other comments received is provided below:
 - a. ORC has no objection to the project proceeding under the fast-track approvals process, while noting the proposal could also be processed under the RMA
 - b. QLDC acknowledges the project's location within a Priority Area and its potential to contribute to housing supply, but considers it misaligned with the Te Pūtahi Ladies Mile Structure Plan and zone provisions, raising concern that approving it as proposed

could lead to adverse environmental and community effects, set an undesirable precedent, and undermine planned infrastructure frameworks, particularly given that key transport, three waters, and community infrastructure are not yet confirmed

- c. ORC and QLDC did not identify any competing applications, and ORC did not identify any existing resource consents to which sections 124C(1)(c) or 165ZI of the RMA apply
- d. the Minister for the Environment notes that the project is located near the Shotover River, which is protected by a Water Conservation Order under the RMA, and suggests requiring an assessment of consistency with the Order and inviting additional community groups to comment at the substantive stage
- e. the Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development has no objection to the application progressing and encourages due regard to relevant Treaty settlement legislation, instruments, and feedback from Māori groups
- f. the Associate Minister of Housing supports referral and considers the project would help address housing affordability by increasing supply through a build-to-rent model
- g. the Minister for Economic Growth considers the project is likely to deliver significant regional economic benefits, primarily through large-scale construction activity and associated employment
- h. DOC considers there is sufficient information to inform your referral decision in relation to the conservation approvals sought and has not identified any matters under section 21 of the Act that would warrant declining the referral
- i. NZTA raises concerns that higher densities across the Te Pūtahi Ladies Mile zone could exceed the capacity of State Highway 6 and requests a comprehensive integrated transport assessment be provided with the substantive application – they note that although the planning framework does not set a maximum number of dwellings, it was based on accommodating approximately 2,100–2,400 dwellings, whereas the project proposes 1,100 dwellings on a smaller area.

27. The following parties were also invited to comment on the project, but no responses had been received at the time this briefing was finalised: the Minister of Conservation, the Minister for Regional Development, and eight Māori groups.

Reasons to decline

28. The statutory framework in Appendix 1 sets out the situations where you must decline the application for referral under section 21(3). We consider that you have sufficient information to make an informed decision. We further consider you can be satisfied that the project does not involve any ineligible activities and that it meets the referral criteria set out in section 22. As such, we have not identified any reasons under section 21(3) that you must decline this application.
29. You may also decline the application for any other reason under section 21(4). The Act gives some guidance on matters you could consider when deciding whether to decline an application under section 21(5) and these are set out in Table A.
30. We have considered whether the project should be declined on the basis that it may have significant adverse effects on the environment.

31. Comments from invited parties identify potential adverse environmental effects relating to transport, infrastructure, open space, education capacity, and wastewater infrastructure, which may be significant if not appropriately managed. The applicant has identified these effects and proposes mitigation through design, staging, and standard consent conditions, with further detail to be developed through a substantive application.
32. As outlined below, we recommend specifying that the applicant provide a three waters assessment and an integrated transport assessment with the substantive application, including details on the proposed upgrades and associated funding. Overall, we consider an expert panel is best placed to assess these effects with the benefit of a full assessment of environmental effects and technical input, and we do not consider the application should be declined on this criterion.
33. Ultimately, we recommend you do not decline the referral application for this reason, or any other grounds under section 21(4) or (5) of the Act.

Reasons to accept

34. The statutory framework in Appendix 1 sets out the reasons you can accept a referral application and refer a project to the fast-track approvals process.
35. Our assessment of these matters is detailed in Table A. To summarise, we consider the project aligns with the referral criteria under section 22, as:
 - a. it would have significant regional benefits because it will increase the supply of housing by delivering approximately 1,100 residential units, address housing needs, contribute to a well-functioning urban environment, and will deliver significant economic benefits
 - b. referring the project would facilitate its delivery by allowing the several required approvals under specified Acts to be considered collectively through the fast-track approvals process, resulting in a more timely and cost-effective process than under normal processes
 - c. the project is unlikely to materially affect the efficient operation of the fast-track approvals process because the project is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess under the RMA.

Conclusions

36. We consider the project meets the section 22 criteria and you could accept the referral application under section 21 of the Act and refer the project to the fast-track approvals process, with the specifications outlined below.
37. We consider that if you decide to refer the project, you should specify under section 27 of the Act the following requirements that should apply to the project:
 - a. the following information that must be submitted by the applicant with the substantive application:
 - i. a three waters infrastructure servicing and funding assessment
 - ii. an integrated transport assessment, including details of requisite upgrades and how they will be funded
 - iii. an assessment of the project's consistency with the requirements of the Water Conservation (Kawarau) Order 1997.

- b. Aukaha and Te Ao Marama Incorporated as the groups from whom a panel must invite comments from in addition to those specified in section 53, as the above groups are not automatically captured under the Act but have a relevant interest in the project and were invited to comment at the referral stage.

38. A detailed assessment of the matters you may specify under section 27(3) and our reasoning for these specifications is provided in Table A.

Next steps

39. The Ministry for the Environment (the Ministry) must give notice of your decisions on the referral application, and the reasons for them, to the applicant and anyone invited to comment under section 17 and publish the notice on the Fast-track website.

40. If you decide to refer the project, the Ministry must also give notice of your decision to:

- a. the panel convener
- b. any additional iwi authorities or Treaty settlement entities that you consider have an interest in the matter other than those invited to comment under section 17
- c. the Environmental Protection Authority (EPA)
- d. the relevant administering agencies.

41. You must also provide all of the information you received that relates to this application to the EPA and the panel convener, including:

- a. the referral application
- b. any comments received under section 17
- c. the report obtained under section 18
- d. the report obtained under section 19.

42. We will undertake this action on your behalf.

43. We have attached a notice of decisions letter to the applicant based on our recommendations (refer to Appendix 7) and we will provide it to all relevant parties. We will provide you with an amended letter if required.

44. Our recommendations for your decisions follow.

Recommendations

45. We recommend that you:

- a. **Note** section 21(3) of the Fast-track Approvals Act 2024 (the Act) requires you to decline the referral application from Simplicity Living Limited (the applicant) if you are satisfied that the project involves an ineligible activity, or you consider that you do not have adequate information to inform the decision under this section or if you are not satisfied that the Simplicity Living – Te Pūtahi Ladies Mile project (the project) meets the referral criteria in section 22 of the Act.

Noted

- b. **Agree** that before deciding on the application for project referral under section 21(1) of the Act you have considered:
- i. the application in Appendix 2
 - ii. the report obtained under section 18 in Appendix 4
 - iii. the report obtained under section 19 of the Act in Appendix 5
 - iv. the comments sought under section 17 and provided within the required time frame in Appendix 6 (note: all comments were received within the specified time frame and must be considered).

Yes / No

- c. **Agree** you are satisfied the project will meet the referral criteria in section 22 of the Act as:

- i. the project, for a large-scale residential and urban development, is a development project that would have significant regional benefits [section 22(1)(a)] because it:

- (1) will increase the supply of housing, address housing needs, and contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [section 22(2)(a)(iii)] by:

- delivering a significant increase in housing supply (approximately 1,100 residential units), thereby contributing to addressing housing affordability challenges in the Queenstown Lakes District

- (2) addressing identified housing needs, including through an increased supply of long-term rentals under a proposed build-to-rent model

- supporting a well-functioning urban environment by incorporating commercial and retail activities to improve access to services and employment, as well as community facilities to enhance onsite amenity for future residents.

- (3) will deliver significant economic benefits [section 22(2)(a)(iv)] in the wider Queenstown area and Otago Region, including

approximately \$472 million in local expenditure through the construction sector over four years and support for 2,277 full-time equivalent (FTE) jobs, with peak employment of 860 FTE nationally in 2029.

ii. referring the project to the fast-track approvals process would facilitate its delivery [section 22(1)(b)(i)], including by enabling it to be processed in a more timely and cost-effective way than under normal processes as:

- (1) it allows the several required approvals under specified Acts to be considered collectively
- (2) appeals under the Act are only to the High Court rather than the Environment Court and are limited to points of law
- (3) the Act precludes public and limited notification.

iii. referring the project is unlikely to materially affect the efficient operation of the fast-track approvals process [section 22(1)(b)(ii)] because the project is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess under the RMA.

Yes / No

d. **Agree** to accept the referral application under section 21(1)(c) and refer the whole project to the fast-track approvals process under section 26(2)(a).

Yes / No

e. **Agree** to specify Simplicity Living Limited as the person who is authorised to lodge a substantive application for the project.

Yes / No

f. **Agree**, under section 27(3)(b)(i) of the Act, to specify a deadline of two years from the date of the notice of decisions letter for the applicant to lodge the substantive application.

Yes / No

g. **Agree**, under section 27(3)(b)(ii) of the Act, to specify the following information that the applicant must submit with the substantive application:

- i. a three waters infrastructure servicing and funding assessment
- ii. an integrated transport assessment, including details of requisite upgrades and how they will be funded.
- iii. an assessment of the project's consistency with the requirements of the Water Conservation (Kawarau) Order 1997.

Yes / No

h. **Agree**, under section 27(3)(b)(iii) of the Act, to specify the following groups from whom a panel must invite comments from in addition to those specified in section 53:

- i. Aukaha
- ii. Te Ao Mārama Incorporated.

Yes / No

- i. **Agree** that the Ministry for the Environment will provide your notice of decisions to:
- i. anyone invited to comment on the application, which includes the relevant administering agencies
 - ii. the panel convener
 - iii. the Environmental Protection Authority (EPA).

Yes / No

Signatures



Stephanie Frame
Manager – Fast-track Operations

Hon Chris Bishop
Minister for Infrastructure

Date:

Table A: Stage 2 analysis

Recommendation	<u>Accept</u> the referral application and refer the project to the fast-track approvals process.		
Project details	Project Name	Applicant	Project Area
	Simplicity Living – Te Pūtahi Ladies Mile (the project)	Simplicity Living Limited (the applicant)	The project area is located at and adjoining 12 Lower Shotover Road, Queenstown, within the Otago Region, and includes adjacent or nearby land and road reserves required to enable associated transport and three waters infrastructure works.
Project description	<p>The project is to construct and establish a residential development under a build-to-rent model along Ladies Mile in Queenstown, on approximately 10 hectares of land.</p> <p>The project involves:</p> <ol style="list-style-type: none"> approximately 1,100 residential units, across a mix of three storey walk-up apartments and five to seven storey apartment buildings community facilities, including community rooms, indoor recreation and family spaces, open spaces and parks, and onsite car parking (including in buildings) local commercial and retail activities the provision of new internal roads within the site and upgrades to the external roading network the construction of a signalised intersection and bus lane on State Highway 6 the provision of new, and upgrades to existing, three waters infrastructure, including stormwater management, water supply, and wastewater services, both internal and external to the site fee simple subdivision to create development lots, roads, and a park to vest in Queenstown Lakes District Council unit title subdivision of the walk up and apartment buildings bulk earthworks to facilitate the development internally and externally to the site. <p>The applicant seeks the following approvals via the fast-track approvals process to authorise the project, including some approvals sought at this stage on a precautionary basis, subject to further investigations prior to any substantive application:</p> <ol style="list-style-type: none"> resource consents under the Resource Management Act 1991 (RMA) as described in section 42(4)(a) of the Fast-track Approvals Act 2024 (the Act) concessions under the Conservation Act 1987 as described in section 42(4)(e) of the Act approvals under the Reserves Act 1977 as described in section 42(4)(e) of the Act wildlife approvals under the Wildlife Act 1953 as described in section 42(4)(h) of the Act. 		
Minister invites comments / requests information	<p>Comments from invited parties [section 17]</p> <p><i>The following section provides a summary of the comments received from invited parties under section 17 of the Act. Full copies of all comments received are attached in Appendix 6. Under section 17(7)(a) of the Act, you must consider any comments received within the time frame under section 17(6). All comments were received within the specified time frame for this application and <u>must</u> be considered.</i></p> <p>Local authorities</p> <p><i>Queenstown Lakes District Council (QLDC)</i> QLDC did not identify any competing applications. The comments received from QLDC include general comments on the project, an assessment of the cumulative impacts of the Act (Attachment A), a stormwater layout plan (Attachment 2), a technical memorandum prepared by QLDC’s Property & Infrastructure Department, a technical memorandum prepared by QLDC’s Parks Department, a strategy and policy memorandum, a planning peer review, a urban design peer review, and one elected member statement.</p> <p>QLDC acknowledges that the project is located within a Priority Area identified in the QLDC Spatial Plan and considers this appropriate in principle, noting its potential to contribute to housing supply, including long-term rental housing. However, QLDC states that the project raises critical concerns requiring further work to ensure that development outcomes appropriately balance regional economic benefits with the avoidance or mitigation of significant adverse effects on the environment, community, and district. QLDC considers that the project is not aligned with the expectations of the Te Pūtahi Ladies Mile Structure Plan and associated zone provisions confirmed through the Streamlined Planning Process, particularly in relation to anticipated land use, density, and infrastructure staging.</p> <p>QLDC raises concern that approving the project as proposed could set a precedent for further departures from the planned outcomes, potentially resulting in development exceeding intended capacity and undermining the established transport and three waters infrastructure framework, noting that key supporting infrastructure, including transport, three waters, and community facilities, has not yet been formally confirmed with the applicant.</p> <p>QLDC considers that the project is significantly misaligned with local planning documents, particularly the Te Pūtahi Ladies Mile Structure Plan and associated zone provisions, and identifies several key areas of concern. QLDC states that there is substantial uncertainty regarding transport infrastructure, including upgrades, staging, approvals, and funding, and notes that the project is likely to exceed education capacity triggers without clear provision for or funding of additional schooling, increasing pressure on existing schools.</p> <p>QLDC also raises concerns regarding urban design, including building height impacts on outstanding natural landscapes/features, adequacy and location of open space, road layout, and visitor parking. QLDC considers that the absence of suitable public open space and increased density would place additional strain on parks and community facilities, particularly where proposed open space is poorly located and less functional. While QLDC notes that three waters servicing may be achievable, it considers this remains uncertain and dependent on further technical assessment, staged delivery, and formal agreements.</p> <p>QLDC considers the consultation undertaken with them was not satisfactory for the purposes of section 11 of the Act. [Note: Officials consider the consultation undertaken was sufficient to meet section 11 of the Act, and previously made that determination during the completeness check under section 14]. If the project is referred, QLDC considers that the substantive application should include further information on several matters, including transport infrastructure, education infrastructure, three waters infrastructure, staging and integration, parks and community facilities, planning alignment, and effects management.</p>		

Otago Regional Council (ORC)

While ORC has no objection to the project proceeding under the fast-track approvals process, they note that applications of this manner can be processed under the RMA pathway. ORC confirms the proposed activities are not prohibited under its regional plans and has not identified any grounds to decline the referral application under section 21 of the Act. ORC did not identify any competing applications, or any existing resource consents issued where sections 124C(1)(c) or 165ZI of the RMA could apply.

ORC provides preliminary feedback on the referral application and identifies matters to be addressed by the applicant in a substantive application, including the need for resource consents for earthworks and supporting technical documentation such as an Environmental Management Plan and erosion and sediment controls. ORC also notes potential requirements relating to contaminated land investigations, and any further consents that may be needed depending on site conditions and compliance with regional plan rules.

ORC considers the project will generate significant transport demand and advises that key infrastructure, including roads and bus priority measures, be designed and staged to accommodate future public transport needs, with clarity provided on delivery responsibilities and timing.

Ministers

Minister for the Environment

The Minister identifies that the project is located near the Shotover River, which is protected by the Water Conservation (Kawarau) Order 1997 (WCO) under the RMA, and considers that the project could result in wastewater discharges affecting water quality required to meet contact recreation standards. The Minister states that the application has not identified the potential applicability of the WCO and considers there is a risk that, if the substantive application does not include an assessment of the proposal's consistency with the WCO, this may delay the expert panel's deliberations. The Minister suggests that information requirements for the substantive application could include an assessment of consistency with the WCO, and that the following parties be invited to comment at the substantive stage: Lake Hayes and Shotover Country Community Association, Queenstown Lakes Community Action, and Aotearoa Water Action.

Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

The Minister has no objection to the application progressing. The Minister encourages the applicant and the expert panel to have due regard to relevant Treaty settlement legislation and instruments, and to any feedback from relevant Māori groups as set out in Treaty settlements and the section 18 report.

The Minister notes the project does not demonstrate Māori-specific economic benefits but may result in positive outcomes such as lower housing costs, and encourages the applicant to consider how it could intentionally support Māori economic development, including through procurement opportunities for Māori enterprise. If progressed, the Minister states the project would also contribute to addressing housing shortages and increasing rental supply in the Queenstown Lakes District.

Associate Minister of Housing

The Associate Minister supports referral of the application and considers the project would contribute to addressing Queenstown Lakes' significant housing affordability challenges by increasing supply, particularly through the proposed build-to-rent model. They note the project is located within Te Pūtahi Ladies Mile, identified as a future urban area, and while the proposed height and density exceed district plan provisions, they consider it aligns with the objectives of the Spatial Plan and Masterplan and would maximise the use of a well-located site given limited greenfield capacity in central Queenstown.

The Associate Minister acknowledges transport infrastructure constraints during peak periods and considers these will need to be addressed by the expert panel, noting the applicant has proposed upgrades including a bus lane to support public transport. They also consider the project could act as a model for further large-scale build-to-rent developments in the area.

Minister for Economic Growth

The Minister considers the project is likely to deliver significant regional economic benefits, primarily through large-scale construction activity and associated employment, with longer-term benefits arising from the delivery of a substantial number of permanent rental dwellings and supporting urban infrastructure. While most quantified economic benefits occur during construction, the Minister notes the project would deliver approximately 1,064 permanent rental apartments – equivalent to around 4.7 years of rental supply – alongside 40–50 ongoing management and maintenance roles and an estimated \$381 million in broader ongoing social and economic benefits.

Based on the applicant's economic evidence memorandum, the Minister identifies the project has an estimated total development cost of approximately \$570 million, including \$431 million in construction costs. The construction phase is estimated to generate \$1.006 billion in total economic activity across New Zealand over 2025–2030, with employment peaking at around 860 full-time equivalents in 2029. Approximately \$753 million (around 75 per cent) of this activity would occur within the Queenstown Lakes District. Total construction-phase employment is estimated at around 3,036 full-time equivalent roles nationally over the period, with approximately 2,277 retained within the district.

Māori Groups

Kāti Huirapa Rūnaka ki Puketeraki

While Kāti Huirapa Rūnaka ki Puketeraki does not have a position on whether the application should be referred, they ask that the applicant continue to engage, and in a meaningful way, as they develop their substantive application. Kāti Huirapa Rūnaka ki Puketeraki note that the applicant has undertaken some initial engagement on the referral application with Aukaha and Kā Rūnaka (the collective name for the seven papatipu rūnanga relevant to the project area). A process agreement signed by the applicant and Kā Rūnaka provides for further engagement and sharing of technical reports, which will ultimately enable Puketeraki and other papatipu rūnanga to reach an informed position on the project through a substantive application, should it be referred.

Kāti Huirapa Rūnaka ki Puketeraki note that the Crown's commitment to recognise Ngāi Tahu as tangata whenua of, and as holding rangatiratanga within, the takiwā of Ngāi Tahu Whānui is fundamental to the fast-track regime. Amongst other matters to be worked through as part of a substantive application, Kāti Huirapa Rūnaka ki Puketeraki have significant concerns about the capacity of the Shotover River/Kimiākau Wastewater Treatment Plant to absorb sewage from the proposed development. They note that ongoing issues with the disposal field have already resulted in the discharge of treated wastewater into the Shotover River/Kimiākau, a practice which is abhorrent to Puketeraki. If the proposed development increases the loading at the treatment plant, then Kāti Huirapa Rūnaka ki Puketeraki are seeking mitigation of any effects.

Te Rūnanga o Ngāi Tahu (Ngāi Tahu)

Ngāi Tahu has a neutral position on whether the application should be accepted for referral and reiterated the concerns of Kāti Huirapa Rūnaka ki Puketeraki in relation to the capacity of the Shotover River/Kimiākau Wastewater Treatment Plant to absorb sewage from an additional 1100 residential units plus commercial and retail outlets. Ngāi Tahu also supports continued engagement by the applicant with Kā Rūnaka should the application be referred.

	<p>Administering agencies</p> <p><i>Department of Conservation (DOC)</i> DOC considers there is adequate information to inform a referral decision in relation to the conservation approvals sought. DOC has not identified any reasons under section 21 of the Act for the Minister to decline the referral. DOC did not identify any aspect of the project that be an ineligible activity under section 5(1)(i), (j), or (k) of the Act.</p> <p>DOC has not identified any issues with the applicant's compliance history in relation to conservation approvals, or any competing applications. DOC notes that the Queenstown Cable Car project (FTAA-2510-1124 – referral application accepted in April 2026) intends to undertake works within the same parcel of public conservation land – we provide further commentary on this below. While a conservation approval of this nature typically takes three to four months to process, DOC notes there may be benefits in combining them with RMA approvals under the Act. DOC has reviewed the section 22 criteria and considers the concession sought does not appear to be inconsistent with the Otago Conservation Management Strategy 2016 (noting detailed analysis will occur at the substantive stage). DOC considers the project will not address a significant environmental issue.</p> <p>While DOC notes they do not have sufficient information to determine the level of any actual and potential environmental effects, they consider it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels for the conservation approvals. DOC encourages the applicant to engage further with DOC prior to the lodgement of any substantive application.</p> <p>Any other persons or groups</p> <p><i>NZ Transport Agency Waka Kotahi (NZTA)</i> NZTA states that while the planning framework for the zone does not specify a maximum number of dwellings, it was developed on the basis of accommodating approximately 2,100 to 2,400 dwellings, and notes that the project proposes 1,100 dwellings on a proportionally smaller area. NZTA considers that the transport infrastructure upgrades associated with the zone were designed to support this anticipated yield, and raises significant concerns that higher overall densities across the zone could exceed the capacity of State Highway 6 and associated networks, leading to congestion, access constraints, and potential gridlock, including impacts on emergency services and the functioning of the wider transport network and economy.</p> <p>NZTA requests that the substantive application include a comprehensive assessment of transport effects, including cumulative impacts of higher densities and the adequacy of proposed infrastructure and mitigation measures. NZTA also considers that approval of the project could set a precedent for higher yields within the zone, and expects any development exceeding the anticipated capacity to demonstrate robust mitigation, including mode shift interventions, to ensure the safe and efficient operation of the transport system.</p> <p>NZTA expects the applicant to include a comprehensive Integrated Transport Assessment with the substantive application, and identifies additional matters for consideration, including transport infrastructure upgrades, subdivision design, the provision of a high school, and servicing infrastructure. NZTA welcomes further engagement with the applicant and the opportunity to comment at the substantive stage.</p>
<p>The Minister must decline an application if the Minister is satisfied that the project involves an ineligible activity [section 21(3)(b)]</p>	<p>We consider you can be satisfied that the project does not involve an ineligible activity because it:</p> <ul style="list-style-type: none"> – would not occur on identified Māori land, Māori customary land or a Māori reservation as confirmed by the relevant records of title – would not occur in a customary marine title area or protected customary rights area as the project area is not in the coastal marine area (CMA) – is not an aquaculture activity or activity that is incompatible with aquaculture activities that would occur in an aquaculture settlement area and for which the applicant is not authorised to apply for a coastal permit because it is not for an aquaculture activity and will not occur in the CMA – would not require an access arrangement which cannot be granted under the Crown Minerals Act (including s61(1A)) because the application does not include an access arrangement – would not be prevented by section 165J, M, Q, ZC or ZDB of the RMA because it will not occur in the CMA and does not involve an aquaculture activity – would not occur on Schedule 4 land as confirmed by the records of title and comments received from DOC – would not occur on a national reserve as confirmed by the records of title and comments received from DOC – would not occur on a reserve held under the Reserves Act 1977 that is managed by or vested in someone other than the Crown or a local authority and that person has not consented in writing as confirmed by the record of titles and comments received from DOC – is not a prohibited activity or decommissioning activity under the EEZA, 15B or 15C of the RMA – is not for the purpose of an offshore renewable energy project. <p>No comments raised by parties invited to comment have indicated that the project would be ineligible for referral.</p>
<p>The Minister must decline an application if the Minister considers they do not have adequate information to inform the decision [section 21(3)(c)]</p>	<p>DOC considers there is adequate information to inform a referral decision in relation to the conservation approvals sought.</p> <p>We consider you have adequate information to inform your decision on the referral application.</p>
<p>Relevant considerations and procedural requirements in Treaty settlement, Mana Whakahono ā Rohe, joint management agreement, or the Marine and Coastal Area (Takutai Moana) Act 2011 or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 [section 16]</p>	<p>We have not identified any matters under section 16 of the Act relevant to the application.</p>

Section 22 assessment criteria

The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]

*The Minister **must** consider a relevant Government policy statement (GPS) [s22(1A)]*

The only current GPS is the Government Policy Statement on Grocery Competition. This project includes a development lot intended to accommodate local commercial and retail activities. However, at this stage, there is no clear indication that these activities would include a supermarket development or grocery-related activities, therefore we consider there to be no GPS relevant to your decision.

*The Minister **may** consider any of the following matters, or any other matters the Minister considers relevant.*

The applicant considers the project, being an urban development in Queenstown, is a development or infrastructure project that would have significant regional benefits.

Will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure [s22(2)(a)(ii)]

The applicant proposes to fund and deliver upgrades to Council's wider three-waters network, providing additional infrastructure capacity to support development within the Te Pūhahi Ladies Mile Plan area. The applicant considers these upgrades will enable growth beyond the boundaries of the project area and deliver broader public benefit by supporting development of the surrounding rezoned area.

The applicant further states that the infrastructure required to service the project meets the definition of regionally significant infrastructure under the QLDC Proposed District Plan. While some infrastructure relates to project-specific water supply, wastewater, and stormwater servicing, the applicant notes that the project also includes trunk infrastructure assets that are intended to be vested in Council, form part of the district's municipal infrastructure, and be integrated into the wider municipal network, which the Plan expressly recognises as regionally significant infrastructure.

QLDC considers that no regionally or nationally significant infrastructure is proposed. While QLDC identifies that all three waters infrastructure required to service the development is proposed to be developer-funded and delivered by the applicant, they state there are no formal agreements in place for the provision of this infrastructure.

We consider the project, primarily for a residential development, aligns more closely with a development project than an infrastructure project under the Act. While the project may result in infrastructure upgrades that provide some benefits, including enabling new development in the area, we consider, based on the information currently available including QLDC's comments, that it does not deliver infrastructure of regional or national significance. Accordingly, we **do not recommend** that the project be referred under this criterion. We note the applicant retains the ability to provide further analysis on this matter with a substantive application to assist the expert panel in understanding the extent of the project's significant regional or national benefits.

Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [s22(2)(a)(iii)]

The applicant states that the project will meet this criterion by enabling a substantial new urban neighbourhood that will materially contribute to meeting projected housing demand in the Queenstown Lakes District. The applicant considers that the scale and delivery model will significantly increase housing supply and choice, with the project delivering approximately 1,100 permanent rental homes, equivalent to around 4.7 years of rental supply based on historic district growth. The applicant states that the economic assessment identifies the project as likely the largest single addition to the district's rental stock, supporting regional housing supply, diversity and affordability objectives.

The applicant considers that the project represents a well-planned and integrated extension of the urban environment, enabled by existing zoning and supported by coordinated infrastructure investment, and is consistent with the direction of the National Policy Statement on Urban Development. The applicant states that the proposed build-to-rent model will ensure all homes remain permanently in the long-term rental market, directly addressing demand for secure rental accommodation and increasing housing choice, particularly through a focus on one- and two-bedroom dwellings, which the applicant notes are in shortest supply within the district.

The Associate Minister of Housing supports referral and considers the project would contribute to addressing Queenstown Lakes' significant housing affordability challenges by increasing supply, particularly through the proposed build-to-rent model. QLDC considers that while the proposal may increase housing supply, particularly long-term rentals, it may not support a well-functioning urban environment in its current form, as it is largely self-contained, does not share amenities with the wider community, and does not provide key supporting infrastructure such as transport or a school.

Based on the assessment above, including the applicant's assessment, and the comments received from the Associate Minister of Housing, we recommend that the project **does meet the criterion under section 22(2)(a)(iii)** as the project will increase the supply of housing, address housing needs, and contribute to a well-functioning urban environment. Overall, the project is considered to meet this criterion, as it will deliver a significant increase in housing supply (approximately 1,100 residential units); address identified housing needs in the Queenstown Lakes District, including through an increased supply of long-term rentals under a proposed build-to-rent model; and support a well-functioning urban environment by incorporating commercial and retail activities to improve access to services and employment, as well as community facilities to enhance onsite amenity for residents. We consider you can refer the project on this basis.

Will deliver significant economic benefits [s22(2)(a)(iv)]

The applicant states that the project will deliver significant economic benefits, primarily through substantial construction activity and the provision of long-term, secure rental housing that supports the district's workforce. The applicant considers construction to be a key driver of economic activity and notes that the project's scale will generate concentrated benefits within the Queenstown Lakes District, with additional spillover into Central Otago and Southland.

The applicant advises that the project has an overall development cost of approximately \$570 million, including around \$431 million in construction costs, and that over the four-year construction period (2026–2030) it is expected to generate approximately \$472 million in local expenditure through the construction sector. The applicant states that the project will support an estimated 3,036 full-time equivalent (FTE) roles nationally during construction, including 2,277 FTEs, with peak employment of 860 FTEs nationally in 2029. Following completion, the applicant notes that the project is expected to support approximately 40–50 permanent FTE roles in property management and maintenance.

QLDC notes that it has not undertaken a peer review of the applicant's economic assessment to quantify the stated economic benefits and therefore does not provide further comment on this criterion. The Minister for Economic Growth considers the project is likely to deliver significant regional economic benefits, primarily through large-scale construction activity and associated employment, with longer-term benefits arising from the delivery of a substantial number of permanent rental dwellings and supporting urban infrastructure.

Given the project's large-scale and proposed construction period, and contribution to regional employment and GDP, we consider it is reasonable to conclude that the economic benefits would be regionally significant in the context of this criterion. Based on the assessment above, including the applicant's assessment and the comments received by the Minister for Economic Growth, we recommend that the project **does meet the criterion under section 22(2)(a)(iv)** as the project will deliver significant economic benefits. We consider you can refer the project on this basis.

	<p><i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i> The applicant states that the project will meet this criterion by implementing the development framework established through the Te Pūhahi Ladies Mile Plan Variation, which promotes a compact urban form, integrated transport planning, and access to local services. The applicant considers that the project will reduce reliance on private vehicle travel by delivering a local shopping centre, supporting the viability of the wider Ladies Mile commercial centre and future school through early residential density, and enabling walking and cycling for daily needs. The applicant further states that the project incorporates a connected street network, access to high-quality active transport routes, and roading designed to accommodate future public transport, and that its compact, higher-density residential form supports energy-efficient buildings and reduced per-capita emissions, consistent with national direction for well-served urban areas.</p> <p>QLDC considers the project does not support climate change mitigation, given their concerns regarding car dependency.</p> <p>We consider the matters raised by the applicant under this criterion do not demonstrate that the project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions, at a scale that would result in significant regional or national benefits. Therefore, we <u>do not recommend</u> you refer the project under this criterion. We note the applicant retains the ability to provide further analysis on this matter with a substantive application to assist the expert panel in understanding the extent of the project's significant regional or national benefits.</p> <p><i>Will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards [s22(2)(a)(viii)]</i> The applicant states that while the project site is not subject to significant natural hazard constraints, the project incorporates features that support climate change adaptation and long-term resilience. The applicant considers that the compact, walkable layout, local shopping centre, and strategically planned location reduce reliance on vulnerable infrastructure and support a more self-sufficient community better able to respond to and recover from the effects of climate change and natural hazard events.</p> <p>QLDC considers the project does not support climate change adaptation.</p> <p>We consider the matters raised by the applicant under this criterion do not demonstrate that the project will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards at a scale that would result in significant regional or national benefits. Therefore, we <u>do not recommend</u> you refer the project under this criterion. We note the applicant retains the ability to provide further analysis on this matter with a substantive application to assist the expert panel in understanding the extent of the project's significant regional or national benefits.</p> <p><i>Will address significant environmental issues [s22(2)(a)(ix)]</i> The applicant states that the project does not directly address any significant environmental issues on the site, as the land is already zoned for urban development and is not subject to major ecological or natural hazard constraints. However, the applicant considers that the project will deliver indirect environmental benefits by concentrating development within an area identified for urban growth, thereby avoiding dispersal into more sensitive environments and supporting efficient use of existing and upgraded three-waters infrastructure. The applicant further states that the project will establish a compact, well-connected neighbourhood with local services, active transport links, and integrated open space that will enhance environmental performance within the surrounding area.</p> <p>Both DOC and QLDC consider the project does not address a significant environmental issue.</p> <p>We consider the matters raised by the applicant under this criterion do not demonstrate that the project would address significant environmental issues at a scale that would result in significant regional or national benefits. Therefore, we <u>do not recommend</u> you refer the project under this criterion. We note the applicant retains the ability to provide further analysis on this matter with a substantive application to assist the expert panel in understanding the extent of the project's significant regional or national benefits.</p> <p><i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i> The applicant considers the project aligns with relevant local and regional planning documents, including the Queenstown Lakes Spatial Plan and both the Proposed and Operative Otago Regional Policy Statement, which seek to support social, economic, cultural, and environmental wellbeing through resilient, well-functioning urban areas. The applicant also considers the project gives effect to the objectives of the QLDC Proposed District Plan, particularly the Te Pūhahi Ladies Mile Plan Change, which was introduced to enable substantial residential growth in response to Queenstown's housing pressures.</p> <p>QLDC considers that the project is significantly misaligned with local planning documents, particularly the Te Pūhahi Ladies Mile Structure Plan and associated zone provisions. QLDC states that there is substantial uncertainty regarding transport infrastructure, including upgrades, staging, approvals, and funding, and notes that the project is likely to exceed education capacity triggers without clear provision for or funding of additional schooling, increasing pressure on existing schools. DOC considers the concession sought does not appear to be inconsistent with the Otago Conservation Management Strategy 2016 (noting detailed analysis will occur at the substantive stage).</p> <p>Given the conflicting positions regarding alignment with the relevant planning documents, we <u>do not recommend</u> referral under this criterion. We note the applicant retains the ability to provide further analysis on this matter with a substantive application to assist the expert panel in understanding the extent of the project's significant regional or national benefits.</p> <p><i>Any other matters that may be relevant [s22(b)]</i> We have not identified any other matters that would be relevant under this section. We consider the matters to your consideration have been addressed above.</p> <p><i>Conclusion</i> Based on the assessment above, we consider the project is a development project that would have significant regional benefits in line with the criteria for accepting a referral application under section 22(1)(a) of the Act. If you agree with this recommendation and are satisfied that the whole project meets the criteria in section 22, you may accept the referral application and refer the whole project to the fast-track approvals process in accordance with section 26 of the Act.</p>
<p>Referring the project to the fast-track approvals process [section 22(1)(b)]</p>	<p><i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> The applicant states that referring the project to the fast-track approvals process would facilitate a more timely and cost-effective pathway than under standard processes. The applicant states that, due to the size and complexity of the project, processing through standard RMA pathways would likely place pressure on the QLDC's processing capacity and result in extended timeframes. The applicant considers that the fast-track approvals process provides a more efficient and predictable pathway, including restricted notification, targeted and time-limited opportunities for invited comments, and an anticipated consenting timeframe of around six months, compared with an estimated two to three years under standard processes. The applicant further considers that this approach would enable earlier realisation of the project's benefits while still ensuring appropriate assessment of environmental and planning considerations.</p>

	<p>Although DOC notes conservation approvals of this nature are typically processed in three to four months, they also identify benefits for the applicant from combined consideration with RMA approvals. QLDC considers that while the proposal may be unlikely to encounter significant issues under a standard RMA process if it aligned more closely with zone provisions, its currently proposed height is inconsistent with those provisions and is likely to require public notification.</p> <p>Overall, we agree with the applicant's assessment that referring the project to the fast-track approvals process would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes, <u>in line with section 22(1)(b)(i) of the Act</u>.</p> <p><i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> The applicant states that the project involves the subdivision and development of land for predominantly residential purposes, with land development works that are typical of those anticipated within the relevant zone. On this basis, the applicant considers that assessment by an expert panel and administering agencies would be comparatively straightforward and efficient, and unlikely to materially affect the efficient operation of the fast-track approvals process.</p> <p>QLDC considers the project may affect the efficient operation of the fast-track approvals process, as they consider key infrastructure matters remain unresolved and no formal agreement has been reached. QLDC considers coordination is required across multiple agencies, which could create uncertainty and potential rework during the fast-track process if not resolved before a substantive application is lodged. We note that QLDC, ORC, and NZTA will be invited to comment by the expert panel at the substantive application stage for this project.</p> <p>Overall, we agree with the applicant's reasoning for this criterion and consider that referring the project to the fast-track approvals process is unlikely to affect the efficient operation of the fast-track approvals process, <u>in line with section 22(1)(b)(ii) of the Act</u>. While the project may involve some technical and environmental complexities, projects of this scale and nature are consistent with the types of regionally significant developments the fast-track approvals process was established to consider. We further note the project is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess under the RMA.</p>
<p>Reasons to decline</p>	
<p>Minister <u>must</u> decline [section 21(3)]</p>	<p><i>The Minister <u>must</u> decline a referral application if:</i></p> <p><i>The application may not be accepted under subsection 1 (meets referral criteria) [s21(3)(a)]</i> As detailed above, we consider that the project is a development project that would have significant regional benefits in line with the criteria for accepting a referral application under section 22(1)(a) of the Act. If you agree, there is no reason to decline the application under this subsection.</p> <p><i>The Minister is satisfied the project involves an ineligible activity [s21(3)(b)]</i> As detailed above, we consider you can be satisfied that the project does not involve an ineligible activity. If you agree, there is no reason to decline the application under this subsection.</p> <p><i>The Minister considers that they do not have adequate information to inform the decision under this section [s21(3)(c)]</i> As detailed above, we consider you have adequate information to inform your decision on the referral application. If you agree, there is no reason to decline the application under this subsection.</p> <p>To conclude, <u>we have not identified any reason that you must decline the application under section 21(3)</u>.</p>
<p>Minister may decline [section 21(4) and 21(5)(a-h)]</p>	<p><i>The Minister <u>may</u> decline a referral application for any other reason, whether or not it meets the criteria in section 22.</i></p> <p><i>Reasons to decline a referral application under subsection 4 include, without limitation:</i></p> <p><i>The project would be inconsistent with a Treaty settlement, Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, Marine and Coastal Area (Takutai Moana) Act 2011, a Mana Whakahono ā Rohe, or a joint management agreement</i> No inconsistencies have been identified with the above documents in the section 18 Treaty settlements report.</p> <p><i>It would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts</i> The section 18 report has not identified any matters which make it more appropriate for the proposed approvals to be authorised under another Act or Acts. DOC has not identified any reason why the conservation approvals should not be considered through the fast-track approvals process. Overall, we have not identified any matters that would indicate the proposed approvals should be considered under another Act or Acts.</p> <p><i>The project may have significant adverse effects on the environment</i> Comments from invited parties have raised a number of matters in relation to the project, that if not suitably managed, could create significant adverse effects on the environment. These include to transportation, infrastructure, open space, education capacity, and the capacity of the Shotover River/Kimiākau Wastewater Treatment Plant.</p> <p>We consider the applicant has provided sufficient information to enable your decision on the referral application, including a description of the anticipated and known adverse effects of the project on the environment. The applicant considers any potential effects can be appropriately managed through mitigation and management measures, with the detail to be refined and confirmed as part of the substantive application. They further consider any adverse effects associated with infrastructure construction and operation can be appropriately managed through design, staging, and standard consent conditions.</p> <p>As outlined below, to ensure these matters are covered at the next stage, we recommend specifying that the applicant provide a three waters assessment and an integrated transport assessment with the substantive application, including details on the proposed upgrades and associated funding. Overall, we consider an expert panel is best placed to consider any adverse environmental effects of the project with the benefit of a substantive application (including a full assessment of environmental effects), relevant expert input, and further input from commenters. An expert panel has the ability to seek technical advice and impose conditions as deemed appropriate or decline the application if the effects outweigh the benefits.</p>

While the project may involve some technical and environmental complexities, projects of this scale and nature are consistent with the types of regionally significant developments the fast-track approvals process was established to consider. We further note the project is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess under the RMA. As such, we do not consider you should decline the application on this basis.

The applicant has a poor compliance history under a specified Act that relates to any of the proposed approvals
The applicant has identified that they previously received an infringement notice under the RMA, relating to construction activity involving concrete pouring outside the hours specified in a resource consent condition. The applicant states that the matter was resolved and that there have been no further instances of non-compliance.

DOC states they have not identified any issues with the applicant's compliance history in relation to conservation approvals. The comments received from QLDC and ORC did not identify any issues with the applicant's compliance history.

While the applicant identifies a limited history of non-compliance under the RMA, the available information suggests they took appropriate corrective action and that the matter did not escalate to prosecution or other court proceedings. On this basis, we do not consider that you should decline the referral application under this criterion.

The project area includes land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes
Although the project area includes public land, no comments received from invited parties have indicated that the project area includes land necessary for Treaty settlement purposes.

The project includes an activity that is a prohibited activity under the Resource Management Act 1991
The project does not include an activity that is a prohibited activity under the RMA.

A substantive application for the project would have one or more competing applications.
QLDC and ORC have not identified any competing applications in the project area.

DOC notes that the Queenstown Cable Car project (FTAA-2510-1124 – referral application accepted in April 2026) intends to undertake works within the same parcel of PCL. A competing application, in relation to a substantive application, is another application made by a different applicant that seeks approval over the same natural and physical resources, where the approvals cannot both be fully exercised if granted. Based on a desktop review, the Queenstown Cable Car project appears to be proposed in a similar area to this project; however, at the time of this briefing, no substantive applications or applications for approvals under another specified Act are known to be in progress for either project. As such, no competing applications have been identified for the project.

We note the applicant, relevant local authorities, and the EPA are required to re-check whether a project would have any competing applications at the substantive application stage. As such, we have not identified any reason to decline this project under this criterion.

In relation to any proposed approval of the kind described in section 42(4)(a) (resource consents), there are one or more existing resource consents of the kind referred to in section 30(3)(a)
ORC did not identify any existing resource consents issued where sections 124C(1)(c) or 165ZI of the RMA could apply.

Any other matter
We have not identified any other matters or reasons to consider declining the referral application.

Conclusion
We do not recommend you decline the application. We note you retain the discretion to decline a referral application under section 21(4) for any other reason, whether or not the project meets the criteria in section 22.

Specified matters for an accepted referral application

The Minister may specify any of the matters under section 27(3)

The Minister may specify any or all of the following under section 27(3) in the notice of decisions letter for an accepted referral application.

Restrictions that apply to the project (for example, on its geographical location, its duration, or the aspects of the project that may be carried out)
We recommend the project description and project details at the beginning of this table are copied into the notice of decisions letter. We have not identified any other specific restrictions that we consider would apply to the project.

In relation to a substantive application for the project:

A deadline for lodging the application, unless section 27(3)(c) applies
The applicant states, if the necessary approvals are granted, they intend to commence construction immediately (ideally in October 2026). We consider the standard deadline for lodging the substantive application under section 28(3)(d)(ii) is suitable, which would be the date that is two years after the notice is given to the applicant.

Information that must be submitted with the application
The Minister for the Environment recommends that, under section 27(3)(b)(ii) of the Act, you specify that the applicant must submit an assessment of the project's consistency with the requirements of the Water Conservation (Kawarau) Order 1997 under the RMA. The referral application does not reference this Order, and requiring this assessment at the substantive application stage would ensure that the matter is appropriately considered by the applicant. As such, we recommend you specify this as an information requirement for the substantive application.

In addition, other invited parties have identified further matters that they consider should be addressed in the substantive application. In particular, NZTA requests a comprehensive assessment of transport effects, including cumulative impacts of higher densities and the adequacy of proposed infrastructure and mitigation measures. QLDC also considers that further information is required on a range of matters, including transport infrastructure, three waters infrastructure, education infrastructure, staging and integration, parks and community facilities, planning alignment, and effects management.

Having regard to these comments, we recommend that you also specify that the applicant must submit:

- a three waters infrastructure servicing and funding assessment; and
- an integrated transport assessment, including details of requisite upgrades and how these will be funded.

For the other matters referenced by QLDC, we note the Act already prescribes a range of information that must accompany a substantive application, including the matters set out in clauses 5–7 of Schedule 5, which specify the information required in a resource consent application, including the matters to be addressed in an assessment of environmental effects.

While the project has some complexities and will likely require a range of technical assessments, we consider that the information requirements in the Act, together with the specified additional assessments and the expert panel's ability to request further information if required, are sufficient to support an effective assessment. Following a decision on the referral application, the applicant will also have access to the comments received from invited parties and can have regard to those matters when determining the scope of information and technical assessments to include with the substantive application. Careful consideration of those comments is likely to assist in supporting an efficient assessment process.

Notwithstanding this recommendation, you retain discretion to specify any further information that must be submitted with the substantive application if you consider it appropriate to do so.

The persons or groups from whom a panel must invite comments in addition to those specified in section 53

If you decide to accept the referral application, we recommend you specify in the notice of decisions the following persons or groups be invited to comment on the substantive application, for the reasons outlined below:

- Aukaha – identified as a Māori group with other relevant interests under section 18(2)(k), that is not specified in section 53
- Te Ao Mārama Incorporated – identified as a Māori group with other relevant interests under section 18(2)(k), that is not specified in section 53.

We note the Minister for the Environment requested that if you refer the project, you require the following community groups be invited to comment as additional parties: Lake Hayes and Shotover Country Community Association, Queenstown Lakes Community Action, and Aotearoa Water Action. If you decide to refer the project, a panel must invite comments from adjacent landowners and occupiers under sections 53(2)(h) and (i) of the Act, and a panel can also invite comments from any persons or groups they consider appropriate (section 53(3) of the Act). We consider a panel will be best placed to consider who to invite comments from with the benefit of a complete substantive application, and therefore, with the exception of the relevant Māori groups identified above, we do not recommend you direct a panel to invite comment from any specific additional persons or groups.

We note you retain discretion to decide not to specify that any of these parties be invited by the panel to comment at the substantive application stage. You may also specify that any other persons or groups of your choosing be invited to comment. You do not need to specify the parties already captured under section 53, as those parties must be invited to comment on a substantive application by the expert panel. This includes relevant local authorities, relevant iwi groups and Treaty settlement entities, relevant administering agencies, the Minister for the Environment and other relevant portfolio Ministers, and the owners and occupiers within or adjacent to the land to which the substantive application relates (including any requiring authority that has a designation within or adjacent to the land – this includes NZTA for this project).

Whether the substantive application would have any competing applications

N/A – QLDC and ORC have confirmed they have no record of any competing applications in the same project area.

Whether, in relation to any proposed approval of the kind described in section 42(4)(a) (resource consent), there are any existing resource consents of the kind referred to in section 30(3)(a)

N/A – ORC did not identify any resource consents of the kind referred to in section 30(3)(a).

Conclusion

We recommend you specify under section 27(3)(b)(ii) the following further information that the applicant must provide with the substantive application: a three waters infrastructure assessment, an integrated transport assessment, and an assessment of the project's consistency with the requirements of the Water Conservation (Kawarau) Order 1997. We also recommend you specify under section 27(3)(b)(iii) Aukaha and Te Ao Mārama Incorporated as the groups from whom a panel must invite comments from in addition to those specified in section 53. This is reflected in our recommendations above. We have not identified any other specified matters for the accepted referral application.

Appendix 1: Statutory framework summary

1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
 - a. give the document the same or equivalent effect through this process as it would have under any specified Act; and
 - b. comply with any applicable procedural requirements.
3. You must decline a referral application if:
 - a. you are satisfied the project does not meet the referral criteria in section 22
 - b. you are satisfied the project involves an ineligible activity (section 5)
 - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in section 21(5) and even if the application meets the section 22 referral criteria.
5. You can decline an application before or after inviting comments under section 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at the initial stage you must copy the application to, and invite written comments from:
 - a. the relevant local authorities
 - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
 - c. any other relevant portfolio Ministers
 - d. the relevant administering agencies
 - e. the Māori groups identified by the responsible agency
 - f. the owners of Māori land in the project area (if applicable)
 - g. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.