

File ref: FTAA-2607-1264

1 September 2026

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Dear Daya

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

Simplicity Living Limited (SLL) received a Request for Further Information from the Environmental Protection Agency (EPA) on 24 August 2026 to assist the EPA in determining whether the application is complete under section 46(2) of the Fast-Track Approvals Act 2024 (FTAA).

SLL appreciates the opportunity to provide additional detail and sets out the following information in response to the EPA's request.

1. Eight storey apartment buildings:

In relation to the eight storey apartment buildings, please provide further information regarding any material differences, and any material differences in effects, between the proposal as described in the referral and in the application. Please include the number of apartment buildings that will be eight storeys. This information is requested to enable the EPA to assess the requirements under section 46(2)(b) of the Act.

In relation to building height, SLL refers back to the Section 28 Notice of Decision that states:

- 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)*

SLL confirms that *one* apartment building (Building 30, shown in Appendix C – Architectural Drawings) includes an eighth storey. The residential component of this building remains seven storeys, which is fully consistent with the referral order description of “residential units, across a mix of three storey walk-up apartments and five to seven storey apartment buildings” which is designed to hold approximately 1,100 residential units. The eighth storey does not contain any residential units; it accommodates communal facilities, which were expressly included in the

referral order as part of the project description ("community facilities, including community rooms, indoor recreation and family spaces, open spaces and parks, and onsite car parking (including in buildings)").

Final building heights reflect refinement of earthworks, stormwater design, and floor-to-floor heights through detailed design. These refinements have not altered the general residential scale, bulk, or distribution of buildings assessed at referral stage. The residential built form continues to align with the 3 - 7 storey range authorised by the referral.

SLL's position, that the substantive application is entirely consistent with the referred project, is further supported by the fact this refinement does not result in any material difference to the proposal or its effects. The addition of this community space, to the top of the Building 30, provides a community-focused amenity level including a lounge, co-working space, kitchen, and meeting/function room for hire. The communal space is oriented south to capture views toward the Remarkables, Lake Wakatipu, and Queenstown Hill. No additional residential yield is created, with the 1,085 units proposed in the substantive application being well within the referred scope of "approximately 1,100 residential units".

Figures 1, 2 and 3 illustrates the location and elevation of Building 30, including the communal facility level.

In relation to landscape and visual effects, SLL considers the landscape and visual outcomes anticipated in the substantive application are not materially different from those anticipated in the referral.

The Landscape Effects Assessment (LEA) confirms that the height exceedances, including the eight-storey element, sit comfortably within the context of a master-planned medium-density development. The taller building (Building 30) is located well within the site, set back from the SH6 frontage and embedded amongst buildings of varying heights. Its visual prominence is substantially reduced by its internalised position, the surrounding built form, and the presence of landscaped courtyards with specimen tree planting. As noted in the LEA, "the highly glazed southern elevation of the eighth-storey residents' common amenities space on Building 30 is just visible as part of the overall massing in some views from SH6 as illustrated in visual simulation #06" (LEA, p.17). This confirms that the additional storey results in only a minor change to perceived massing and does not introduce new or materially different landscape or visual effects beyond those anticipated in the referral.

When considered as a whole, the proposal maintains the same development footprint, urban form, and overall built character. The final height of Building 30 does not generate new or materially different effects beyond those already identified in the referral AEE.

Figure 4 depicts Visual Simulation 06.



FIGURE 1: APPENDIX C ARCHITECTURAL DRAWINGS: SHEET SK07. BUILDING 30 OUTLINED IN RED

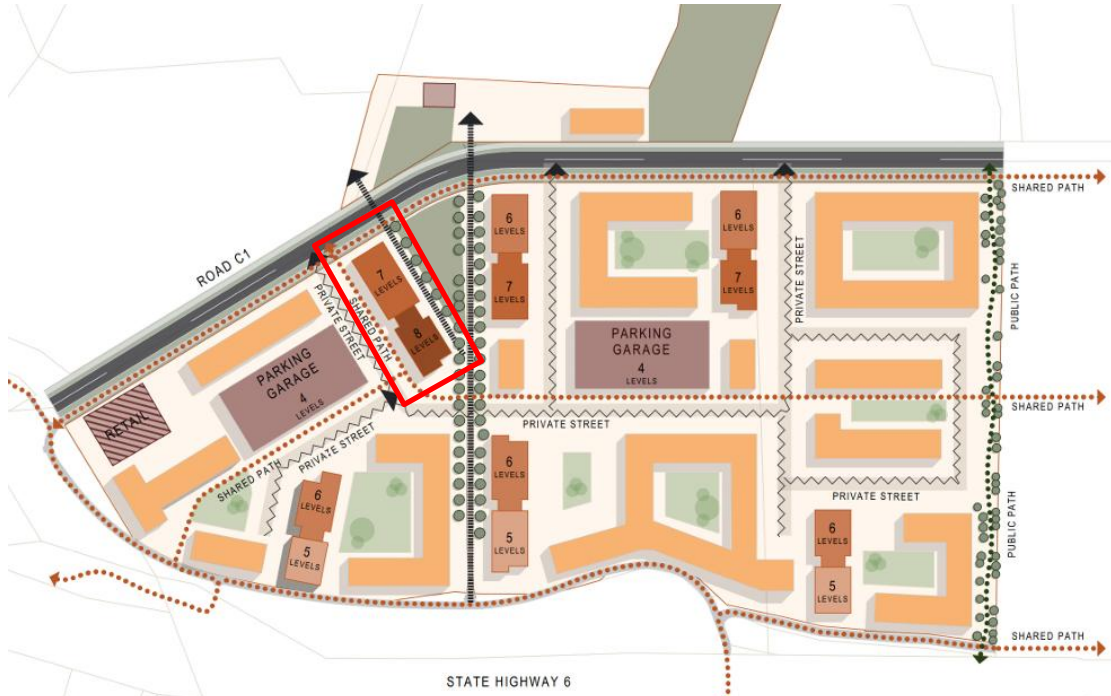


FIGURE 2: APPENDIX C ARCHITECTURAL DRAWINGS: SHEET SK06. BUILDING 30 OUTLINED IN RED



FIGURE 3: APPENDIX C ARCHITECTURAL DRAWINGS: SHEET SK51 BUILDING 30 ELEVATION



FIGURE 4: APPENDIX C ARCHITECTURAL DRAWINGS: SHEET SK35. BUILDING 30 OUTLINED IN RED

2. Wildlife Permit

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

Clause 2(1)(e): outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):

SLL's ecologists Wildlands have reviewed the request for further information and provided technical advice for the following response.

A full lizard survey is scheduled for spring 2026 and will confirm presence, abundance, and habitat use of species likely to be present at the site. However, please see the memoranda (Wildlands 2026a, 2026b) for more detail regarding our assessment of species potentially present. The species most likely to be present is the Not Threatened McCann's skink. Based on surveys in the surrounding area, it is possible, *yet unlikely*, that any At Risk or Threatened species are present.

Pending survey results, potential impacts to Not Threatened species are expected to be limited to accidental injury/death/displacement, disturbance to lizards during earthworks, and loss of

indigenous lizard habitat. Effects to lizards will be managed through progressive habitat reduction, and standard best-practice salvage and relocation protocols. If higher-risk species are identified, additional effects management will be incorporated into the Lizard Management Plan that is currently being prepared.

Clause 2(1)(f): state how the methods proposed to be used to conduct the actions specified under clause 2(1)(b) will ensure that best practice standards are met:

All methods proposed for survey, capture, handling, and relocation will follow DOC's Herpetofauna inventory and monitoring toolbox: Herpetofauna: Modules for biodiversity inventory and monitoring.

The Lizard Management Plan will document these methods in detail and demonstrate alignment with DOC best practice. All other methods will follow standard practice used by Herpetologists for management of lizards including gradual vegetation reduction, and manual habitat removal.

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:

The authorised herpetologist will be suitably qualified as being trained and approved by the DOC lizard Technical Advisory Group and will be implementing lizard management at the site.

Any lizards captured will be handled and held following best practice. All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers (to prevent accidental crushing), in full shade. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and prevent dehydration.

An Incidental Discovery Protocol will be provided by the project herpetologist that outlines how contractors will safely, efficiently, and humanely catch and house any lizards found while herpetologist are not onsite.

Clause 2(1)(h): state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):

The wildlife-related activities will occur within the development footprint at 12 Lower Shotover Road, Queenstown, and the pipeline along the Shotover River within the Kawarau River Marginal Strip, as shown on the submitted site plans, if the Lizard Survey results show lizards in this area. GPS coordinates and a map will be included in the Lizard Management Plan once survey transects and habitat polygons are finalised.

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).

The Lizard Management Plan will assess the effects on lizards at a local population scale, using the Quality Planning Extent of Adverse Effects criteria (Quality Planning, 2017). The effects on lizards will be managed via avoidance, remediation, minimisation, or compensation, in that order.

- Avoidance often involves avoiding lizard habitat where possible.
- Remediation often involves onsite restoration with lizard friendly planting, and the addition of habitat units for cover and retreats.
- Minimisation often involves a lizard salvage, or a form of managed habitat reduction.
- Compensation will only occur in order to address residual effects to lizard following lizard salvage, or if lizard salvage is not considered a viable option (due to practicality, number of lizards anticipated) or as a contingency built into the Lizard Management Plan, (i.e., to address impacts to At Risk or Threatened species, or if more lizards are discovered during salvage than expected).

The Lizard Management Plan will be prepared following the principles outlined by the Department of Conservation (DOC) in their guidelines (DOC 2019). These principles describe steps to take and enable the outcome of successful lizard management (including salvage, if determined to be the right mitigation option):

- Lizard species' values and site significance must be assessed at both the impact (development) and receiving sites
- Actual and potential development-related effects and their significance must be assessed
- Alternatives to moving lizards must be considered
- Threatened species require more careful consideration than less-threatened species
- Lizard salvage, transfer and release must use the best available methodology
- Receiving sites and their carrying capacity must be suitable in the long term
- Monitoring is required to evaluate the success of the salvage operation
- Reporting is required to communicate outcomes of salvage operations and facilitate process improvements
- Contingency actions are required when lizard salvage and transfer activities fail

Additionally, there is no detail of the proposed release sites, which may be relevant if lizards are to be relocated. Please provide further information in this regard, where possible, as per clause 2(1)(b): identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land).

For both McCann's skink and Southern Grass skink, the use of the Kelvin Heights areas as a release site will be suitable. However, the carrying capacity of this proposed release site will need to be assessed in further detail once lizard surveys at the impact site determine the species presence and the population densities.

A list of predicted lizard species provided, but no details on the numbers present or impacted has been supplied. Please provide further information in this regard, where possible, as per clause 2(1)(d): List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted.

Two species of indigenous lizards may be present on site based on the location and habitat present (Table 1).

McCann's skink (Not Threatened) are likely to be present on site as this species is known to be widespread and abundant in the region, including in marginal habitats such as rank grassland in farmland and suburban areas, where the species can often be found at high densities.

Southern grass skink (At Risk – Declining) are possible, but unlikely, present, as they can also be found in rank grassland, but this species is patchily distributed and generally found at

significantly lower densities than McCann's skink in lowland areas around Queenstown and Central Otago.

Potential lizard habitats identified at 12 Lower Shotover Road include areas of rank grassland which are widely distributed across the site, including in the following areas:

- Along the Lower Shotover Road road margin, and between Lower Shotover Road and State Highway 6 and the paddocks on site.
- In small fenced-off areas, including south-west of the dwelling and in the north-west corner of the eastern paddock.
- Within the majority of the western paddock, parts of the central paddock and northern paddock, and around the margins of the eastern paddock.
- In patches adjacent to the 12 Lower Shotover Road house driveway and around the containers and equipment in the south-west of the eastern paddock.

The majority of the eastern paddock and parts of the central, western and northern paddocks was well maintained and therefore did not provide lizard habitat.

No assessment can be made on the estimated number of skinks present without further surveys, which are scheduled for spring, 2026. However, the habitats present within the sites for this project are considered to be of overall low quality (lack of significant refugia, dense grassland, and highly fragmented), so are unlikely to support large numbers of skinks. A finer estimate on numbers anticipated to be impacted can be provided in the LMP following the lizard surveys.

Table 1 – Potential lizard species present at the Te Pūtahi Ladies Mile development area.

Species	Common Name	National Threat Status	Regional Threat Status	Habitat	Likelihood onsite
<i>Oligosoma maccanni</i>	McCann's skink	Not Threatened	Regionally Not Threatened	Rank grassland in farmland and suburban areas.	Highly likely
<i>Oligosoma chionochloescens</i>	Southern grass skink	At Risk – Declining	Regionally Declining	Dense rank grassland	Possible

3. Location of the proposed activity – Concession Area

Schedule 6, clause 3(1)(b) requires: a description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places). In accordance with the requirements of clause 3(1)(b), please provide GPS co-ordinates where they are available.

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.

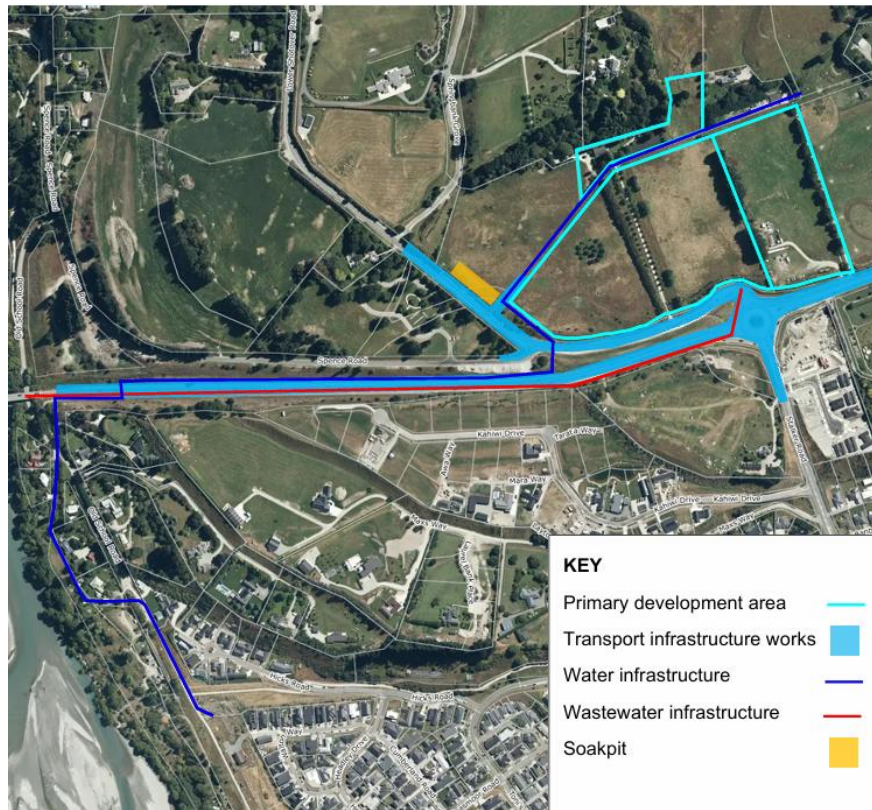


FIGURE 5: EXTENT OF SITE. SOURCE: GRIP MAPS.

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.

The concession area is required over the marginal strip land adjacent to the Shotover River. The land Appellation is Crown Land Block III Shotover Survey District. The marginal strip is 19.8711 hectares in size, however the concession is only required over a portion of the northern section. The water supply pipeline will connect the Shotover Country Borefield to the existing QLDC water supply network. The pipe will follow legal road and pass through the marginal strip.



FIGURE 6: WATER SUPPLY PIPELINE SHOWN IN BLUE. GREY SHADING = ROAD RESERVE. YELLOW SHADING = MARGINAL STRIP SOURCE: GRIP

GPS co-ordinates are plotted along the pipeline as shown in Figure 7 below and are as follows:

428522.00, 814392.74

428543.85, 814332.45

428582.11, 814284.50

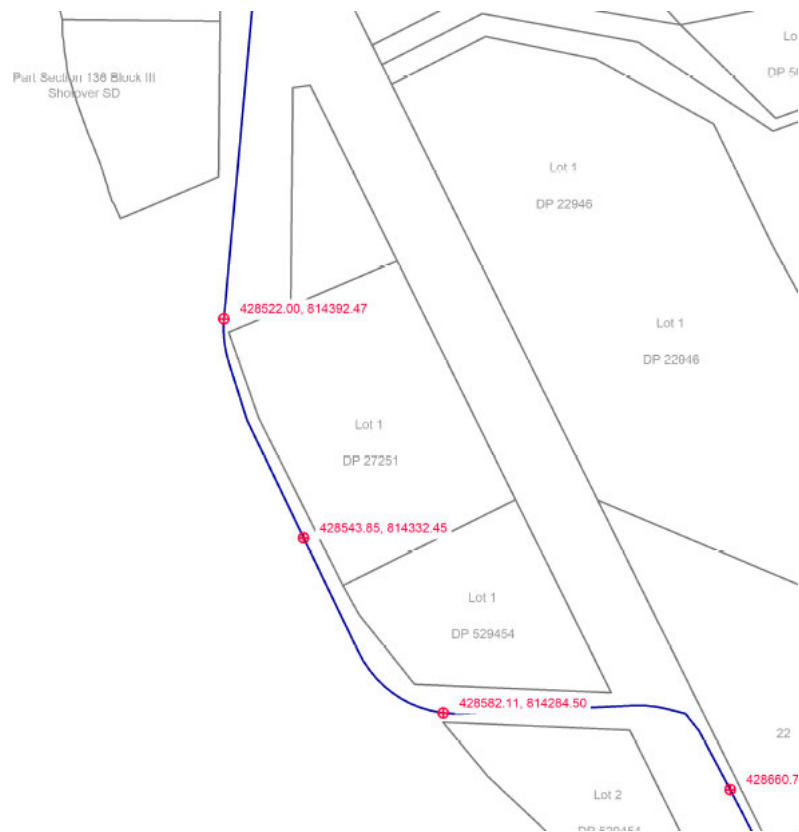


FIGURE 7: GPS CO-ORDINATES CONCESSION AREA

If you have any questions, please contact me by phone or email.

Yours sincerely,

Jo Skuse
Principal Planner

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