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Environmental Protection Agency

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To whom it may concern,

1 Introduction

Since lodgement of Simplicity Living Limited's (SLL) Fast-track Approvals Act (FTAA) substantive application for the Te Pūtahi Ladies Mile Development (Proposal), SLL has made a few minor design amendments to the Proposal.

The extent of these design amendments are shown in the following drawings / plans appended to this memorandum:

- Updated Architectural Drawing Set prepared by Brewer Davidson, dated 21/09/2026.
- Updated Scheme Plans prepared by McKenzie & Co, dated 17/08/26.

The above drawings / plans are intended to supersede the following documents submitted with the substantive application:

- Appendix C Part 1 and 2 – Architectural Drawing Set
- Appendix L - Appendix A – MCCL Engineering Plans Part 1, lodged with the substantive application: Drawing numbers 4163-0-100, 4163-0-101 and 4163-0-102.

This planning memorandum summarises the design amendments and outlines the extent to which the amendments impact the degree of non-compliance with the Queenstown Lakes District Plan (District Plan). In summary, the proposed design amendments have very limited impact on the overall compliance assessment of the Proposal against the District Plan. The changes do not affect the overall activity status for the Proposal.

The relevant experts have also assessed the design changes, and each conclude that the amendments do not materially alter the architectural, landscape, visual or transport effects of the Proposal. The effects identified remain of the same nature and scale as those previously assessed within the substantive application.

2 Material provided with this planning memorandum

This planning memorandum should be read alongside the following documents which are also provided:

- Architect's Additional Statement prepared by Kevin Brewer, Brewer Davidson, dated 11/11/2026. This statement is provided in addition to Appendix D – Architect's Statement.
- Landscape Memorandum prepared by Rachel de Lambert, Boffa Miskell, dated 10/11/2026. This statement is provided in addition to Appendix F – Landscape Effects Assessment.
- Transport Additional Information prepared by Jason Bartlett, Bartlett Consulting, dated 09/11/2026. This statement is provided in addition to Appendix I – Integrated Transport Assessment.
- Updated Compliance Assessment provided as:
    a. a tracked-change version; and
    b. a clean version incorporating the amendments.

  Note this Appendix supersedes the following Appendix lodged with the substantive application: Appendix Z- Rule Compliance Assessment.

3 Description of Amendments to the Proposal

The amendments to the Proposal are summarised below.

3.1 Apartment Buildings 19 and 29

The proposed layouts of Buildings 19 and 29 have been amended slightly, which has resulted in some minor changes to the apartment configuration, façades and overall yield, as shown on Sheets SK49 and SK84 of the Architectural Drawing Set. The waste disposal buildings previously designed to be detached from these apartment buildings are now proposed to be contained within the buildings. The overall ground floor area of the apartment buildings hasn't changed.

The revised Proposal provides a total of 1,083 apartments, compared with 1,085 apartments proposed in the lodged substantive application. The revised configuration comprises four fewer one-bedroom apartments and two additional two-bedroom apartments, with no change to the number of three-bedroom apartments.

The configuration of some of the three-bedroom apartments within Buildings 1, 6, 9, 14, 18, 21, 23, 24, 35, 38 and 40 have also been amended to increase internal living room areas, resulting in a slight reduction to the associated private outdoor living spaces, as shown on Sheets SK85 and SK86.

Minor amendments have also been made to the roof pitch of some of the three-storey walk-up apartment buildings (being Buildings 1, 4, 7, 8, 9, 14, 21, 23, 24, 31, 32 and 35). The revised roof forms have increased from 15 degrees to 20 degrees. This provides variation in building appearance across the project but they remain below the 13m permitted height limit and do not result in any additional height infringements.

3.2 Parking Building Amendments

The design of the two proposed parking buildings has been revised following a constructability review and parking/storage assessment. An additional partial level (lengthways) has been added to each parking building. Storage lockers and lift shafts have also been incorporated at the ends of the parking buildings. The external façade treatment has been updated to include an indicative pattern that will ultimately be determined with a Ngāi Tahu appointed artist. Sheets SK10, SK11 and SK49-SK54 of the attached Architectural Drawing Set illustrate the revised parking buildings.

The revised design increases parking provision within the two parking buildings from 600 spaces to 652 spaces. This consequentially means at-grade and roadside resident parking reduces from 505 spaces to 499 spaces. Overall resident/visitor parking within the site increases from 1,105 spaces to 1,151 spaces as a result of the design amendments.

The Proposal continues to provide a minimum of one car park and one bicycle park per residential unit. The remaining parking spaces will be available for resident and visitor parking as demand requires.

3.3 Subdivision Boundary Amendments

The internal boundary between proposed Lots 1 and 3 has been amended. Lot 1 now incorporates Building 30 and communal building C1, as shown on the attached updated Scheme Plans.

The proposed minor boundary amendment does not alter the overall development concept but does change certain post-subdivision recession plane, site coverage and outlook space outcomes, as discussed in Section 3 below.

4 Updated Compliance Assessment

The Compliance Assessment submitted as Appendix Z to the substantive application has been updated to reflect the amended Proposal. Both tracked-change and clean versions of the updated compliance assessment accompany this memorandum.

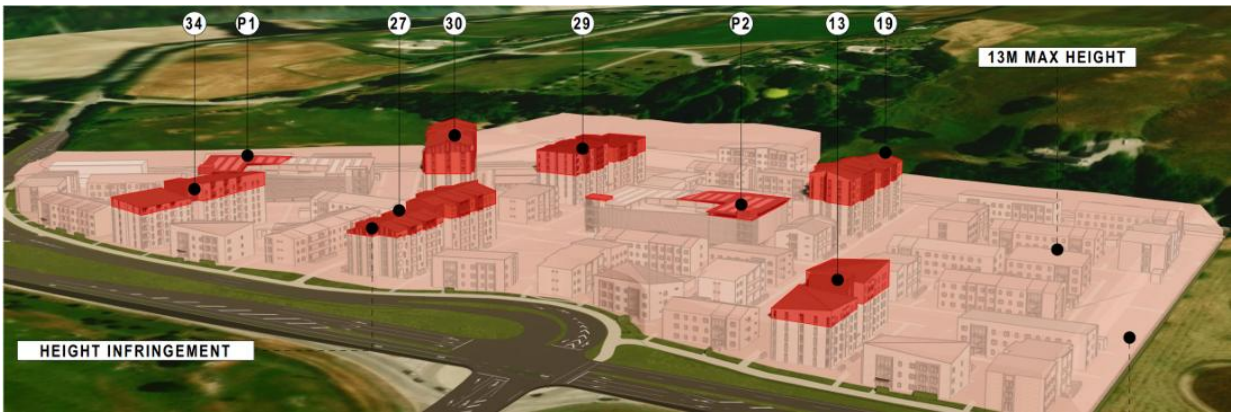
The resulting changes to District Plan compliance are summarised below. There is no change to the Regional Plan compliance matters.

4.1 Parking Building Height and Building Separation

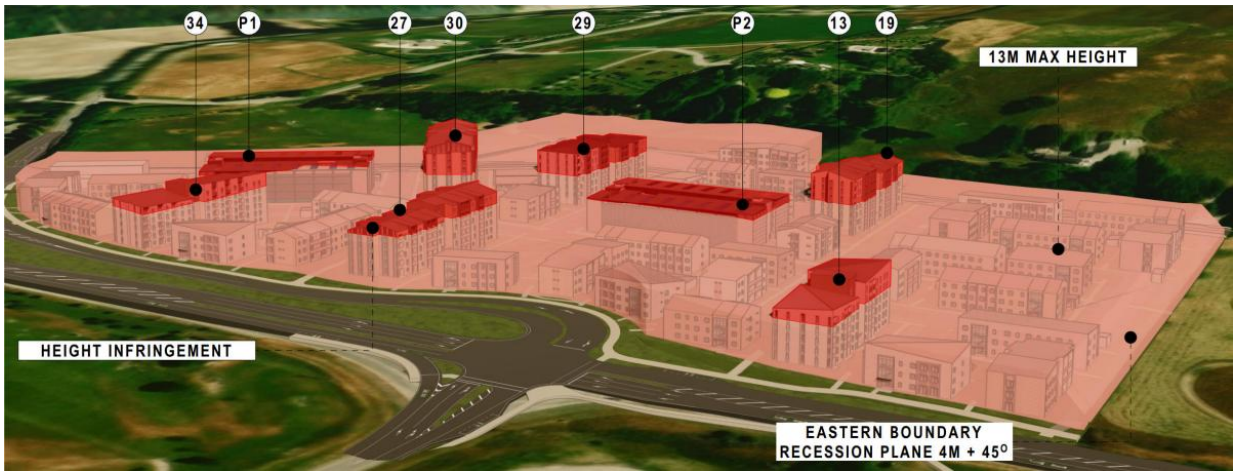
The designs of the two proposed parking buildings have been revised and an additional partial level (lengthways) has been added to each building. This has changed the extent to which the buildings infringe the permitted height limit in two ways:

- **Maximum height infringement:** Firstly, the location and height of the lift machine rooms (which make up a small component of each building) has changed. The height of the lift shafts has increased by 1.2m and 1.4m for Buildings 1 and 2 respectfully. This means the maximum height of Buildings P1 and P2, are now 17.8m (previously 16.5m) and 18.0m (previously 16.6m) respectively.
- **Extent of building infringing the permitted height limit**: The upper floor of P1 and P2 are now proposed to be fully covered by roof and incorporate solar panels. The roof lines of both buildings sit below the lift shafts, but the additional partial level results in a larger area of the roof protruding through the 13m permitted height plane when compared to the design lodged with the substantive application.

These changes are shown on Drawing SK11 Revision A and Figure 1 below.



Parking Buildings – Substantive Submission Design (Four Levels)



Parking Buildings – Amended Design (split level Four and Five Floors)

Figure 1: Comparison views FTAA lodged parking building (top) and as now proposed (below).

The amended design also results in a new non-compliance with the 8m permitted building separation distance required by Rule 49.5.32. The separation from Building P1 to Buildings 38 and 39 is 6.1 metres. The separation from Building P2 to Buildings 22 and 23 is 6.7 metres, as shown on Sheets SK70 and SK71. These changes do not result in any change to the overall activity status for the Proposal.

4.2 Apartment Buildings

4.2.1 Outdoor Living Spaces

The changes to the layout of the three-bedroom apartments results in a minor increase to the extent the Proposal infringes the outdoor living space permitted standards, as shown on Sheets SK85 and SK86 of the Architectural Drawing Set. In particular, the 3 bedroom units above ground, which have gained extended living space within the unit, no longer contain balconies.

The nature of these infringements is consistent with the outdoor living space infringements assessed in paragraphs 7.2.4 and 7.2.5 of the original architectural evidence.

4.3 Subdivision Boundary Amendments

4.3.1 Recession Planes

The amendment to the internal boundary between proposed Lots 1 and 3 alters the post-subdivision recession plane outcomes shown on Sheets SK.C06 and SK.C07 of the updated Compliance Assessment. As a result:

- The previously identified recession plane infringement associated with Building 30 has reduced, as shown on Sheet SK.C07 of the updated Compliance Assessment; and
- A new recession plane infringement arises in relation to Building 29 along the amended internal boundary with proposed Lot 3, as shown on Sheet SK.C06 of the updated Compliance Assessment.

These changes do not result in any change to the overall activity status for the Proposal.

4.3.2 Site Coverage

The amendment to the internal boundary between proposed Lots 1 and 3 increases site coverage on proposed Lot 3 from 45% to 46%, resulting in a new post-subdivision site coverage minor infringement (the permitted building coverage is 45%). This infringement arises solely as a consequence of the amended lot configuration and does not involve any change to the building footprint GFA proposed within Lot 3.

This new infringement does not result in a change to the overall activity status for the Proposal.

4.3.3 Outlook Spaces

The internal boundary amendment also results in new post-subdivision outlook space infringements affecting apartments on the western side of Building 29 as shown on Sheet SK.C04 of the Compliance Assessment.

This new infringement does not result in a change to the overall activity status for the Proposal.

5 Specialist Assessment of Amendments

SLL has requested the relevant experts reassess the Proposal (as now amended) to confirm there are no changes to their effects conclusions in the reports submitted as part of the substantive application. Memoranda from Mr Brewer (architect), Ms de Lambert (landscape and visual) and Mr Bartlett (transport) have been provided with this planning assessment. In summary, these experts all confirm that the amendments to the Proposal do not change the conclusions in their original assessments.

5.1 Architectural Assessment

An additional statement has been prepared by Mr Brewer to assess the architectural and urban design implications of the amendments. The statement considers the revised parking building design, additional height, building separation infringements and changes to outdoor living spaces.

The parking buildings remain centrally located within the development and are screened from surrounding public areas by the proposed residential buildings. The architectural treatment of the buildings, together with landscaping and the orientation of adjacent living areas and balconies, reduces potential visual and residential amenity effects.

The parking buildings are located to the south of the nearest apartment buildings and will not cast shadows onto those buildings.

With respect to the additional outdoor living space infringements, Mr Brewer confirms that the assessment in paragraphs 7.2.4 and 7.2.5 of his original evidence remains applicable. His additional statement updates the relevant parts of his original assessment evidence regarding compliance as to the parking building design and building separation.

The changes have been assessed in the context of the relevant District Plan standards and, notwithstanding some increases in the extent of non-compliance, the changes do not materially alter the nature or degree of the associated effects from those assessed for the proposal as originally lodged.

5.2 Landscape and Visual Assessment

In her Landscape Memorandum, Ms de Lambert assesses the increased height and revised design of the parking buildings, together with the minor façade changes to Buildings 19 and 29.

She considers the parking buildings will continue to have limited visibility from public areas beyond the site because they are located internally and screened by surrounding residential buildings. The additional split level results in limited apparent change and does not alter the skyline backdrop or the general visual composition of the development.

She also considers the minor façade changes to Buildings 19 and 29 are not material to the nature or scale of the overall development and do not result in changes to the assessed landscape and visual effects of the Project.

Overall, Ms de Lambert concludes that the amendments do not change the previously assessed low levels of landscape and visual effects.

5.3 Transport Assessment

In his Transport Additional Information letter, Mr Bartlett has assessed the effects of the reduction in apartment numbers and the increase in parking provision.

He considers the reduction from 1,085 to 1,083 apartments results in a corresponding theoretical reduction in travel demand. However, the change is minimal and will not result in any noticeable change to the transport modelling or the findings of the original transport assessment.

The amended Proposal provides 1,151 resident parking spaces. Together with the public, visitor, accessible and café/office parking, the development will provide a total of 1,275 parking spaces for its various users. Mr Bartlett concludes that the amendments will not result in any noticeable transport changes or fundamentally alter the original transport assessment or its findings.

6 Planning Assessment

The amendments outlined in this memorandum do not alter the fundamental nature of the Proposal, its overall development concept, or the manner in which the development relates to its surrounding environment. The changes also do not impact the Proposal's significant regional benefits.

The attached specialist statements conclude that the amendments do not materially alter the architectural, landscape, visual or transport effects of the Proposal. The effects identified remain of the same nature and scale as those previously assessed within the substantive application.

With respect to the revised roof pitches of the three-storey walk-up apartment buildings, the amended roof forms remain below the applicable 13m height standard and does not result in any additional height infringements. The amendments do not alter the scale, bulk or visual appearance of the buildings as viewed from the surrounding public realm, when viewed considering the wider development, and do not result in materially different visual, streetscape or residential amenity effects.

The amended internal boundary between proposed Lots 1 and 3 results in minor alterations to the post-subdivision recession plane, site coverage and outlook space outcomes. However, these changes arise as a consequence of the amended underlying lot configuration rather than any change to the physical development proposed on the site. The location, footprint, height and design of the affected buildings remain substantially unchanged from those assessed as part of the substantive application.

In relation to site coverage, the increase from 45% to 46% on proposed Lot 3 does not arise from any increase in building footprint, building bulk or development intensity beyond that already assessed. Rather, the infringement is a consequence of the revised lot configuration. Accordingly, it does not give rise to any additional adverse effects beyond those considered in the substantive application.

Similarly, the outlook space infringements associated with Building 29 arise solely as a consequence of the amended internal boundary. The affected apartments continue to maintain outlook over shared pathways, landscaped areas and shared open spaces within the development. The change does not alter the conclusions reached in the substantive application.

The revised recession plane infringements are also internal to the development and arise from the amended subdivision scheme rather than any substantive change to building form. The scale and nature of these infringements are minor and do not result in materially different effects from those previously assessed.

Having regard to the updated compliance assessment and the attached specialist statements, it is my opinion that the amendments do not materially alter the environmental effects of the Proposal or the conclusions reached in the substantive application report. Accordingly, the overall planning conclusions and outcomes sought through the lodged substantive application remain unchanged.

7 Conclusion

The proposed amendments represent refinements to the development since lodgement of the substantive application. While they result in a number of amended and additional compliance matters, the attached specialist assessments and planning review confirm that the amendments do not result in materially different effects or alter the conclusions reached in the substantive application. They also do not alter the overall activity status of the Proposal.

The recommended conditions have not been amended as part of this addendum. Should approval be granted, the relevant conditions will need to be updated to reference the amended architectural drawings accompanying this memorandum.

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

Yours sincerely,



Jo Skuse
Principal Planner

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Attachments

Attachment 1 Architectural Drawing Set prepared by Brewer Davidson, dated 21/09/2026

Attachment 2 Scheme Plans prepared by McKenzie & Co, dated 13/08/26

Attachment 3 Architect's Additional Statement

Attachment 4 Landscape Memorandum

Attachment 5 Transport Additional Information

Attachment 6 Appendix Z Rule Compliance Assessment