

File ref: FTAA-2607-1264

24 August 2026

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

Tēnā koe,

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

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

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

Request for Further Information

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

1. Eight storey apartment buildings:

The application proposal includes five to eight-level apartment blocks, described in section 3.3 of the Substantive Application. The referral proposal includes five to seven-level apartment buildings in section 3.1 of the Referral Assessment of Environmental Effects ([Referral AEE](#)).

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.

2. Wildlife Approval

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

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

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

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

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:

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

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).

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.

3. Location of the proposed activity

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.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 21 September 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 21 September 2026, whichever is sooner.

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

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

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

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

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'Daya Thomson', with a stylized, cursive script.

Daya Thomson

Team Leader, Fast-track Applications