

BEFORE THE PANEL PURSUANT TO THE FAST-TRACK APPROVALS ACT 2024**IN THE MATTER**

of an application made under the Fast-Track Approvals Act 2024 by RCL Homestead Bay Limited.

RESPONSE TO WRITTEN COMMENTS**RCL HOMESTEAD BAY LIMITED****4 NOVEMBER 2025**



Introduction

1. This response to submissions is filed on behalf of RCL Homestead Bay Limited (**RCL**) pursuant to Section 55 of the Fast Track Approvals Act 2024 (**FTAA**) with contributions from the Homestead Bay consultant team and RCL.
2. Thirty-four submissions were received by parties invited to comment by the Panel under Section 33 of the FTAA. As there is a significant level of repetition in the points raised, the below responses to the submissions are collated into the general themes or topics that have been raised, rather than responding to individual submissions.
3. As a result of the consideration of the submissions, some changes or amendments to the plans or reports are proposed to be made. Some of these updates have been unable to be completed within the timeframe allowed however they are still being worked on and can be supplied to the Panel. It is suggested that the Panel may wish to formalise the submission of these documents via Section 67 of the FTAA.
4. A number of submissions recommended changes to conditions of consent. The intent of these recommendations has been considered as part of this response, however an updated set of proposed conditions is not provided due to the time constraints and the process for review of draft conditions later in the FTAA process. These could also be provided in response to a request for further information from the Panel under Section 67 of the FTAA. Where the existing proposed conditions of consent are referred to below, the version of Appendix T that was updated and submitted to the Panel on 19 September 2025 is referred to.
5. The written comments received from Kā Rūnaka appear to be a preliminary position intended to be a placeholder until the Cultural Impact Assessment (**CIA**) is completed and final positions are outlined on the various areas of interest. The Panel has allowed Kā Rūnaka until 12 November 2025 to provide the CIA with the Applicant having the opportunity to respond following this time. Consequently, a response to the Kā Rūnaka's written comments has not been provided as part of this memo.

General Support

6. The Ministers for Infrastructure and the South Island (also Associate Minister for Transport) submitted that the development reflects the Government's economic growth, housing development and infrastructure priorities.

Alignment with the Fast Track Referral Application and Economic Benefits

7. The Jacks Point Group's submission raises questions about the alignment between the substantive application and the referral application. This appears to centre around the approach taken to the medium density, high density and commercial "super lots".
8. It is noted that referral applications require a "*general level of detail about each proposed approval*" (section 2(d) of the FTAA) and the proposal is considered to be consistent with how the referral application was generally described.
9. Regardless, the approach of only seeking subdivision consent for the superlots and not also land use consent was seen as a pragmatic approach so to provide the full picture of what is anticipated across the entire site and to allow the assessment of the servicing of the full development at this initial stage. This approach has been taken due to the impracticality for detailed land use consents to be sought through the FTAA process for large numbers of apartments, terraced houses and commercial buildings. Typically, these developments require detailed analysis of urban design and traffic and parking matters to ensure high quality outcomes. This would have significantly increased the level of complexity and assessment required for the consideration of the application. It was concluded it was impractical to submit such info as part of this substantive application given the already large application for the remainder of the subdivision. Nevertheless, there will be substantial benefits in establishing the entire street network in comprehensively planned manner via this approval process.

10. There are various pathways through which land use consents will in due course be able to be sought for the "superlots". The Queenstown Lakes District Council (**QLDC**) have stated that they intend to commence a plan variation for the implementation of the Te Tapuae Southern Corridor Structure Plan (**TTSC**) within one year of the adoption of the structure plan, however it is also open to the Applicant to apply for a private plan change or to apply for a separate fast track approval for the development of the medium, high and commercial superlots.
11. A related point is made in the Jacks Point Group submission that only the benefits of 1438 standalone lots should be assessed. This is an impractical and unnecessarily narrow consideration as it is a reasonable expectation that land use consents will follow on for the superlots. Notwithstanding, even were the application only to be considered on the basis of the 1438 low density lots, it would still have a substantial economic benefit. For completeness, Urban Economics updated their assessment considering such a scenario. They advised the following:

"At a development scale of approximately 1,438 dwellings, the estimated economic contribution would remain significant. Construction activity is estimated to generate approximately \$400 million in value-added GDP, supporting approximately 2,400 full-time equivalent (FTE) jobs.

The development's direct impact on the construction sector is estimated to be \$187 million in GDP. This would support approximately 1,150 FTE jobs.

The development's indirect impact of the construction on primary industries is estimated to be \$88 million in GDP. This would support approximately 540 FTE jobs. This includes, for example, jobs in the 'Agriculture, forestry and logging' sector resulting from the purchasing of raw materials to construct the proposed dwellings (e.g. timber).

The total ongoing household expenditure from the residents is estimated to be approximately \$63.1 million per annum. This would generate a value-added contribution to GDP of approximately \$37 million per

annum, supporting approximately 300 FTE jobs (based on a value-added per employee ratio of \$119,000)."

12. Furthermore, the development would still be larger than all of the other Queenstown Lakes District housing related fast track developments that have been included on the list or have been referred. This provides confidence that the proposal meets the regional benefit threshold.

Subdivision Design

13. Many of the submissions from the adjoining Jacks Point residents suggest a similar design philosophy be utilised for the development of the Homestead Bay subdivision as has been applied throughout Jacks Point, including working with the natural contours, avoiding significant cut and fill or flattening out of areas and integration of planting and open space buffers.
14. Through the adoption of TTSC the Council has sought to maximise the number of residential units that can be feasibly developed within the Corridor as the TTSC land is identified as one of the limited existing greenfield areas remaining within Queenstown that is suitable for such development and due to the Council's "high plus" population projections and anticipated demand for housing over the short, medium and long terms. Discussions with Council staff in the preparation of the current Fast Track proposal resulted in the proposed numbers of lots and proposed densities being increased compared to that which RCL was originally planning. Furthermore, the proposed densities largely align with those that are identified for the subject site.
15. A pod or enclave style of subdivision design such as developed at Jacks Point creates a less efficient development form in terms of maximising lot and density numbers and this style of development is unlikely to provide the housing needs that the QLDC are seeking through the TTSC without a predominance of apartment housing being developed across the majority of the site. The proposed mix of lower, medium and high density areas are more aligned with the TTSC as well as the established character of development in the corridor.

16. As detailed in the Urban Design Assessment (Appendix O) in the Fast Track application, a 'green frame' has been the focus of the design intent, rather than open spaces provided between the various pods or enclaves that make up the subdivision. This provides for a greater number of future houses but also still softens the edges of the development as viewed from neighbouring properties and people passing the site and settles the development into the landscape. Furthermore, landform has been carefully considered in the subdivision design, for example provision of larger lots where the land is sloping, more meandering roads and open spaces in the more elevated and undulating western parts of the site.
17. Several of the adjoining Jacks Point residents who provided written comment have also requested that the existing shelterbelt of trees along the northern boundary of Lot 8 are retained and reinforced for visual screening purposes and wind protection. The retention of these trees is not proposed given their proximity to the works required to be undertaken to the northern channel and the shelterbelt being of unsuitable species to be adjacent to urban development. The boundary of Lot 8 is located a minimum of 275m away from the closest boundary line of the Jacks Point residential properties and this distance is considered to provide suitable mitigation of potential visual effects in an urban setting (and presumably also having little effect as a shelter belt for wind at that distance). Notwithstanding, subdivision roading is proposed along the northern boundary of Lot 8 and this will incorporate street trees which will provide some visual softening of the future built form from these properties.
18. Light pollution of the night sky has been raised as an issue by many of the adjoining Jacks Point residents. Street lighting within the development will be required to meet the requirements within the QLDC's Southern Light Strategy 2017 as per the proposed conditions (21(g) and (h)) in Appendix T. The objectives of this strategy seeks a balance between aiding safety and security, protecting amenity (including of the night sky), promoting sustainable lighting and cost efficiency. These requirements as well as the distance of street lights from the adjacent Jacks Point residential properties will minimise the effects of street lighting.

19. Some of the adjoining Jacks Point residents have also provided input relating to a number of design controls for the future buildings within Homestead Bay, including:

- Site coverage should be limited and/or attached housing should be utilised to allow for gardens and greenery;
- A mix of smaller and larger sites should be provided;
- Low gloss, textured dark coloured roofing should be utilised with controls on solar panels and skylights;
- Plant on commercial roofs should be screened.
- Design and material rules similar to those implemented at Jacks Point should be adopted.

20. The first three of the points are already largely provided for as part of the proposed development. A range of smaller and larger sites is being provided as shown in the subdivision plans in Appendix M as well as a subdivision layout providing for lower, medium and high density development.

21. Site coverage controls and roofing colours and material controls are proposed for the development of the low density lots in Appendix N. Similar design and material controls are proposed for the development as has been implemented through the QLDC Proposed District Plan for the Jacks Point Zone as well as similar private design controls imposed via covenant at Hanley's Farm. Combined these are considered to provide a suitable colour and material palette to ensure that the Queenstown vernacular is maintained by the development whilst also providing flexibility and avoiding undue expense. However, limiting the use of solar panels would seem to be an unwarranted outcome at the cost of environmental objectives.

22. The location and screening of plant on commercial roofs will be addressed as part of the future land use consents for those commercial developments.

23. The Lakeside Estate Homeowners Association (on behalf of the **Ōraka** residents) have submitted requesting specific landscape treatments with regard to the southern boundary of the Homestead Bay land as it adjoins

Ōraka to avoid or mitigate adverse effects on the views from their properties. Specifically, they are seeking (summarised):

- A 100m setback for all buildings from the south-eastern boundary (in the location of proposed Lots 1398 – 1404);
- A 40m setback for buildings from the edge of the Southern gully (in the location of proposed Lots 20 – 32);
- A 5m maximum building height restriction for all of the lots located within the southern area of the site bounded by proposed Roads 02, 21 and 31;
- 5m high, 32m wide planted earth mound within the above setback areas and an additional 3m high planted earth mound located along the boundary of Ōraka to be planted as part of Stage 1 of the development; and
- Removal of the proposed native beech planting between the gully and the Ōraka northern boundary.

24. Ōraka have also sought changes along the SH6 boundary. These points are addressed below in the Landscape Effects section of this memo.

25. The proposal put forward by Ōraka would have a significant effect on the developable yield of the site and undercut the benefits of the proposal in terms of housing supply.

26. It is considered that views change over time as areas develop. This is acknowledged in Objective 4 of the National Policy Statement on Urban Development as follows:

Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

27. The urbanisation of the subject site was signalled under the Queenstown Lakes Spatial Plan and has been further approved under the adoption of the recent TTSC. Furthermore, the TTSC seeks a relatively high yield of residential development throughout the remainder of the Southern Corridor in the aim

of providing sufficient housing supply to meet the population projections. Therefore, there needs to be a balance.

28. It is not considered practical nor a requirement of the FTAA to make the proposed development invisible from the Ōraka properties. However, the amenity of these properties has been further considered by the Applicant following discussions with Ōraka representatives and receipt of their submission.
29. The earth mounding of the scale described in the Ōraka submission is not considered to be a practical solution. It risks creating a contrived and unnatural visual outcome and would also have the effect of blocking views down the large gully to the lake from future houses within the proposed development. Furthermore, this option is not supported by all Ōraka residents as indicated in the submission from Annie Rankin and Gary Johnson.
30. The location of the Southern Gully along the southern boundary of the subject site provides a natural separation distance between the proposed future development and the Ōraka properties. Notwithstanding, as shown in **Appendix A**, the Applicant is willing to make adjustments to the proposal to increase the buffer at the northern boundary of Ōraka, to reduce the depth of the lots and to provide additional landscaping and low mounding has been added as a visual buffer. Additional semi-permeable planting along the edge of the properties that front that gully to "soften" those views is a change that the Applicant is willing to make. Additionally, a condition of consent will be volunteered limiting the height of the first row of houses opposite the Ōraka properties to 6m (one storey) rather than 8m. These mitigation measures have been discussed with Ōraka representatives; however, they were not completely satisfied by these.

Reserves and open spaces

31. A number of the adjoining Jacks Point residents expressed a desire for Lot 12 to be permanently protected from development via various mechanisms to provide openness and separation from the Homestead Bay development. The predominant use of Lot 12 for land treatment area as part of the on-site

wastewater disposal option will provide for the open space characteristics of the land to be largely maintained. The only buildings proposed on Lot 12 under this servicing option are the construction of the reservoirs and water and wastewater treatment plants adjacent to SH6 and there may also be buildings constructed on the proposed Reserve Lot 9009 (within the southwest corner of Lot 12) by the QLDC in the future as an expansion of Jack Tewa Park. Consequently, the majority of Lot 12 would visually be similar to its existing state subject to additional planting areas.

32. If the option to connect to the QLDC's wastewater network is pursued then this will free up the majority of Lot 12 for other future activities and possibly development subject to resource consents.
33. The QLDC and some adjoining Jacks Point residents have sought to ensure that the open spaces provided as part of the development are of a sufficient size, quality and location to make sure that they are genuinely usable for the community. A requirement for 33,275m² of reserve land for the Homestead Bay development has been calculated by the QLDC under the QLDC's current Development Contributions policy, with 84,000m² being provided as part of the development. However, primarily for reasons of topography and existing encumbrances, only 1,700m² of the proposed recreation reserve land is currently being accepted by the QLDC. This is disputed.
34. Whilst the provision of flat land is recognised as being necessary for the provision of some recreational facilities such as tennis courts, sports grounds, community buildings and the like, sloping and undulating recreational land can also provide interest, diversity and maintain visual and landscape amenity values in places. It is considered that a mix of recreational opportunities and values should be provided across the Homestead Bay area to provide range of opportunities for both formal and passive recreation for the future occupants of the development. This is consistent with the following outcome sought in the QLDC Parks and Open Spaces Strategy 2021:

A quality open space network should provide the community with access to a range of recreational, cultural, social and environmental experiences while responding to the characteristics and geography of the local area. The District's rural and natural landscapes and mountains all contribute to the open space character of this area.

35. The proposed reserves include areas of both flat and undulating land, which reflects the fact that much of the existing site is undulating.
36. The proposed Local Parks (Reserve Lots 9001, 9004, 9005 – 9007) are predominantly flat or are of significantly greater size than required for a Local Park under the QLDC's Future Parks Provisions Plan 2021 with flat areas being capable of being provided which are 0.3ha or more in area to meet the Local Park minimum area requirement.
37. Of the proposed Community Parks on Reserve Lots 9003, 9005 and 9009, Lot 9009 will be predominantly flat and is earmarked by QLDC for an extension to the existing Jack Tewa Park for an expansion of the sports facilities there including a community/events centre type building. An indicative concept plan of this is attached as **Appendix B**. This was prepared for discussion with QLDC and is only one option for how the reserve lot could be developed.
38. Reserve Lots 9003 and 9005 are of undulating topography, being provided on high points of the land with remarkable views across Lake Wakatipu to Cecil Peak and the Bayonets. Both have areas of flat or gently sloping land that can also be extended or enhanced.
39. The QLDC's Parks and Open Spaces Strategy 2021 allows for undulating land to be considered for Community Parks as detailed in the below extract. Consequently, the consideration of these reserves as Community Parks should not be discounted.

 COMMUNITY PARK	A community park is an area of open space on flat or undulating land that provides a variety of informal recreation experiences for residents across a neighbourhood/suburb. They are often well known by the wider community, are primarily used for the community for informal recreation, social, cultural and leisure activities and can have other complementary values, such as landscape amenity and playgrounds. These parks have a high standard of provision and often have the most multi-use potential. Community parks should be located in a central, prominent position within a suburb/neighbourhood and have good transport and cycling/walking access.	> Multiple kick-around or play spaces > Socialising areas, including picnic and BBQ facilities > Perimeter or walking trail > Small scale recreation infrastructure such as club rooms, public toilets	> McBride Park, Lake Hayes Estate > Kingston School Reserve > Peter Fraser Park, Lake Hāwea > Jardine Park, Kelvin Heights
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40. Sloping land within reserves can also provide an opportunity for creativity in the provision of reserve improvements. RCL has provided a Community Park and a Local Park within its Hanley's Farm development on partly sloping land which has provided unique, well-used play and recreation spaces for the community. See below pictures of Howden Park and Jack Hanley Park in Hanley's Farm showing how the sloping land has been incorporated into the design of the reserve improvements. Both of these examples incorporate play equipment for children and teens, however undulating land can also be developed as high quality passive recreation spaces for walking, picnicking, enjoyment of views etc without intensive development and could be attractive for all ages.





41. A standard QLDC condition of consent (QLDC condition 13(g)) has been proposed requiring that detailed plans for each of the reserves be submitted to the QLDC Parks and Reserves team for approval prior to works commencing for each stage. It is intended that the discussions for the development of each reserve commence at an early point in the planning for each stage of the development to gauge QLDC's intended use for each of the reserves so that the design of the reserve can be developed to fit with this. If specific areas of flat land are desired by QLDC for a particular purpose such as creation of a tennis court within the reserve, then these could be provided as part of the detailed design of the reserve and created via the subdivision earthworks for that stage.
42. The existing encumbrances across the proposed reserve lots were acknowledged in the AEE. The no build covenant that applies to parts of the proposed Reserve Lots 9002 and 9003 will be extinguished upon vesting of the applicable reserve lots in QLDC as obliged by instrument 10441473.5. The legal advice received by RCL in relation to this is attached as **Appendix C**.
43. The existing encumbrances within Lot 9009 were addressed in the AEE. Prior to the vesting of the lot, the Applicant will liaise with the servient tenements of the easements with the aim of rationalising and potentially relocating / removing the easement rights. It may be impractical to remove all of these, however it is considered that if they can be relocated to an area of the lot

which will not unduly affect the development of the lot as intended by the QLDC then this will still be a good outcome in providing for the expansion of the sport and recreation facilities at Jack Tewa Park.

44. It is noted that the QLDC Future Parks Provision Plan 2021 states the following with regard to services and infrastructure through a Community Park:

“Underground services and above ground infrastructure: Community parks should be vested free of encumbrances unless otherwise agreed”.

45. Consequently, there is flexibility for easements to remain within the Community Park if agreed with the QLDC and this can be addressed with QLDC prior to the approval of the vesting and development of the Reserve Lot 9009 under proposed Conditions 13(g) and 47(ii). If an area of reserve is deemed by QLDC to be compromised by the existence of easements, that can be factored into the development contribution credits granted, noting that the application includes a reserve land well in excess of the minimum reserve land requirements.
46. Furthermore, it is noted that there are many Recreation Reserves within the Queenstown Lakes District that contain easements for underground and above ground infrastructure such as three waters pipes and above ground electricity transformers. It is considered that provided this infrastructure is sensitively located so not to affect the feasible recreational use or development of the reserve for its intended purpose (eg easements aligned with a boundary) then these would be suitable and in line with the above exception allowed by the Future Parks Provision Plan.
47. The existing Aurora designation over a portion of the proposed Reserve Lot 9009 does not currently contain any infrastructure for this purpose and initial discussions with Aurora have indicated a willingness to consider alternatives or amendments to this.
48. With regard to proposed Reserve Lot 9002, through the preparation of the Wetland Management Plan it has been identified that the classification of the reserve should probably be Local Purpose (Nature) Reserve, rather than

Recreation Reserve, consistent with the below description from the QLDC Parks and Open Spaces Strategy 2021:

TYPE OF PARK	DESCRIPTION	EXAMPLES
	A reserve or open space that might only partly be developed but contains a natural feature(s) such as native bush, a lake edge, river or mountain view. It is usually a large reserve or open space that provides for informal recreation. These areas may have high Kāi Tahu values as they are adjacent to lakes and rivers, or offer views towards significant mauka, may have ecological values and/or provide access to our unique landscapes. They offer diverse recreation opportunities such as biking, walking, water activities and providing connections with nature. These reserves can include recreational facilities such as boat launching areas, campgrounds, but might also have ecological values, protecting waterways, and providing wildlife corridors. Many of the partners and volunteer groups that work with QLDC use natural reserves. Many events are also held on natural reserves.	> Ben Lomond (Te Taumata a Hakitekura) Reserve > Queenstown Hill (Te Tapunui) > Arrow River (Haehaenui) Reserve > Albert Town Lagoon > Lake Hayes (Waiwhakaata) Reserve > Matakauri Park > Cardrona (Ōrau) Mouth Reserve

49. The following table provides specific assessment of each of the proposed reserve lots that QLDC has opposed:

Reserve lot	QLDC description and recommendation (summarised)	Applicant response
9001	Can meet the Local Park criteria with a change to the reserve boundaries at the top of the slope to create more flat usable land.	This proposed Local Park is sufficiently larger (1.36ha) than the 0.3-0.5ha requirement for a Local Park under the QLDC's Future Parks and Reserves Plan. A flat area of approximately 0.6ha is provided at the top of the reserve area (adjacent to Lots 1 – 9) and renders of one possible development scenario for the reserve were attached as Appendix U to the Fast Track application which show a large flat rectangular open space area in front of Residential Lots 1 –

		4, a flat car parking area and a smaller flat area adjacent to the Southwest gully (Lot 9018) that could contain a toilet.
9003	Does not meet the Community Park criteria as it is too small, has several encumbrances and is hilly.	As noted above, the QLDC Parks and Open Spaces Strategy allows for undulating land to be utilised for Community Parks. The QLDC Future Parks and Reserves Provision Plan states that Community parks are typically 1-2ha in size. The proposed Reserve Lot 9003 is 1.51ha in area. The location of the proposed reserve is in a prime area of the site valued for its panoramic views over Lake Wakatipu. There are multiple ways that this reserve lot could be improved for recreational use, or it may be that its benefit is in remaining relatively uncluttered to respect its landscape amenity values. Regardless, it is considered that this reserve will be an area that future residents of the subdivision will value for its scenic views. Areas of the site can be earthworked to create flat areas and this can be worked through as part of detailed design under the proposed condition of consent. The extinguishing of the no build encumbrance is addressed above.

		The interaction with the adjoining land treatment area and the difference in maintenance requirements can be addressed via installation of a simple post and wire or post and rail fence between the two lots if QLDC desires. Regardless, the land treatment areas will be safe for human contact and consequently the interaction between the two areas is not as fraught as anticipated by the QLDC.
9005	Does not meet the Community Park criteria. Hilly, linear, too small and have a no build covenant. Recommended to expand the reserve boundaries to accommodate 0.3ha (Local Park) or 1-2ha (Community Park) or predominantly flat suitable land. Remove no build covenant.	As detailed in the AEE, Reserve Lot 9005 is proposed to be classed as a Local Park. Its size (1.36ha) exceeds the 0.3-0.5ha required by the QLDC Future Parks and Reserves Provisions Plan for a Local Park. Consequently, although the lot is predominantly linear (due to following the higher ground area which allows for panoramic views) it is significantly greater in size than required. This reserve is also capable of containing a number of amenities indicated as being suitable for a Local Park including a flat, 30m x 30m kick around space, areas for socialising, landscaping. As outlined above for Lot 9003, areas of earthworks could be undertaken on parts of this proposed lot to extend the areas of flat land if this is desired by QLDC.

9009	Can meet Recreation Reserve criteria is the encumbrances are removed to allow for the development of community facilities.	Reserve Lot 9009 is proposed as a Community Park and meets the requirements for this in the QLDC Future Parks Provision Plan. The existing encumbrances and designation on this lot were acknowledged in the AEE and are addressed above.
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50. Overall, the proposed recreation reserve land within Homestead Bay is consistent with the QLDC Parks and Open Spaces Strategy and the Future Parks Provision Plan and will be capable of accommodating the range of sport and recreation infrastructure sought by QLDC such as *"play equipment, public toilets, hard courts, BBQ's and small community rooms"* across the many reserves proposed for the development. The Council's Parks and Open Spaces Strategy and Future Parks Provision Plan does not appear to intend that this range of infrastructure be capable of being developed on every reserve, rather that a diversity of quality, multi-purpose reserves are provided for the community. This is reflected in the Parks and Open Spaces Strategy objectives below and is met, or capable of being met, by the proposed development.

The objectives are main goals of the Strategy. These have been identified through public consultation and Council workshops.

- > Our parks and reserves are diverse, multipurpose and provide for communities, mana whenua and visitors

- > Open spaces are well designed, accessible and valued

- > We are able to plan for and accommodate growth

- > Open spaces are treasured and protected

- > Open spaces contribute to enhanced biodiversity, improved water quality and reduced Green House Gas emissions.

Ecology

51. Concern at the loss of six wetlands within the site have been raised by the Department of Conservation (**DoC**), Fish and Game, the Otago Regional Council (**ORC**) and others. Further consultation has occurred with Wildlands with regard to this feedback and compensation for the loss of the wetlands is now being proposed by the Applicant in line with the recommendations of the above submitters. The extent of this is detailed in the attached memo from Wildlands in **Appendix D**. Due to time constraints, the exact project that this compensation will be put toward has not yet been identified however Wildlands have identified a few initial options. Work will continue to identify a suitable project and conditions of consent will be proposed to allow for an appropriate project to be selected in consultation with DoC and the ORC.
52. RCL favour this option over attempting to retain the smaller wetlands, which are difficult to retain within an efficient urban development outcome without substantial effects on the housing yield and / or compromising the hydrology of remnant ephemeral wetlands.
53. The ORC also recommended that the Panel request further information from the Panel in relation to the hydrological function of the remaining wetland on the site. Specifically:
 - *Whether introduction of water to the wetland is required to ensure no net loss of wetland extent and values. If water is to be introduced, the frequency and volume of water that should be introduced to the remaining wetland to ensure that the wetland is not partially or completely drained by the earthworks. This should consider seasonal variation and encompass the full duration of the earthworks as well as the permanent change to surface water and groundwater inputs to the wetland that result from the altered topography of the site. This is specialist information that should be provided by a suitably qualified and experienced hydrologist.*
 - *Mechanism for introducing water to the wetland, both during active works and following completion of earthworks, and how this will be managed.*

- *Monitoring regime, to measure the success of the hydrological supplementation of the wetland, and to determine whether changes to the rate, volume, or method of water input are required.*

54. The Wetland Management Plan (Appendix QQ) states that the proposed subdivision works will result in an approximate 28% reduction in the existing hydrological catchment for the wetland. Engagement of a hydrologist has been investigated to answer the above ORC queries however it became apparent that given the ephemeral nature of the wetland, it will be difficult to understand the hydrological function of the wetland without a lengthy monitoring prior. Consequently, a definitive answer to these queries is not available at this time.

55. Another option considered was the intermittent diversion of treated stormwater from the adjacent road network in times of heavy rainfall to equate to approximately 28% of the catchment lost to the wetland. It is understood that this may be possible from an engineering design point, however, DoC have recommended that no stormwater runoff from the roading or residential properties be diverted to the wetland. DoC instead recommend monitoring.

56. DoC have also noted that there is little detail in the Wetland Management Plan as to what actions will occur if monitoring detects ongoing adverse effects on the wetland and recommends that subsequent interventions be reflected in the proposed conditions.

57. In response to this feedback from DoC and the ORC, an update to the Wetland Management Plan will be made to cover the monitoring of the hydrological values of the wetland through dipwell water level measurements¹ starting prior to commencement of works on the site through to the implementation of the Wetland Management Plan measures and the regular inspections thereafter for the maintenance period set by the

¹ as outlined in the Landcare Research, Wetland Restoration: A Handbook for New Zealand Freshwater Systems

conditions of consent. The process for identifying any required interventions will also be expanded upon in the Wetland Management Plan.

58. Another point raised by DoC and the QLDC in relation to the maintenance and monitoring of the wetland is the request that the Applicant implement the WMP / maintain Reserve Lot 9002 for a longer period than 3 years. DoC seek a timeframe of 10 years and the QLDC seek that the reserve is maintained by the Applicant until the completion of all subdivision works. The Applicant is happy to amend the proposed condition relating to this to maintain and monitor the wetland for 10 years.
59. A number of submitters seek that predator control measures be included in the consent conditions including within Reserve Lot 9002 to assist in the functioning of the wetland. A proposed QLDC consent condition (condition 12 in Appendix T) requires the submission of a Pest and Weed Management Plan for the southern and central channel areas as well as the lakefront terraces including Lot 9002. It is intended that this incorporate predator trapping, however if this is not clear the wording of the condition can be amended.
60. Many of the submissions from the adjacent Jacks Point residents outlined concerns that the effects on the Karearea and other indigenous birdlife has not been taken into account. The Ecological Effects Assessment in Appendix Y assessed the potential adverse effects from the development upon avifauna and noted that the habitats at the site are currently of low ecological value for indigenous avifauna. The habitat loss was assessed as being likely to have little effect on the wider population of avifauna and that they will be able to disperse and utilise surrounding and nearby habitats when the tree felling on the site occurs.
61. The Ecological Effects Assessment states that the potential adverse effects of the tree felling will be minimised if the tree felling works are undertaken outside of the breeding season (August to February). A condition of consent is proposed to this effect (proposed QLDC condition 43).
62. Furthermore, the Ecological Effects Assessment has recommended that the areas of the site not under development continue to be grazed until the

earthworks commence to discourage the intensive breeding of Pihoihoi. This is also included as a proposed condition of consent (proposed QLDC condition 44).

63. One recommendation from the Ecological Effects Assessment that has erroneously been omitted from the proposed conditions of consent is the need for an Incidental Discovery Protocol to be in place for earthworks undertaken during the avifauna breeding season. The proposed conditions of consent will be updated to include this recommended condition.
64. In addition to the above points, the proposed development includes the planting of 19.02 hectares of indigenous shrubland, beech forest and riparian planting in stages across the development. Once this is established, these plantings will provide important food sources and shelter for indigenous birds and increase diversity.
65. With regard to the relocation of the lizards under the Lizard Management Plan, DoC have stated that they support the proposal to vest the reserve areas, particularly those that are to contain the proposed lizard habitat areas and the restored ephemeral wetland. However, if the land is not vested an alternative form of legal protection such as consent notices or covenants should be imposed to ensure that these reserves are protected in perpetuity. It is also the Applicant's desire for these lots to be vested in the QLDC however this requires the agreement of the QLDC which at this point appears unlikely specifically with regard to the Local Purpose Reserves for three waters. Regardless, this is considered to be covered by the wording of proposed QLDC condition 7(b)(iv) where ongoing compliance with the relevant resource consents, bylaws or other requirements of QLDC are to be encompassed within the functions and rules of the Incorporated Society.
66. DoC have also recommended that the certification and implementation of the Lizard Management Plan form conditions of the QLDC administered subdivision consent and the ORC have recommended that it be included in the conditions of consent for the Residential Earthworks consent that ORC will administer. The rationale behind the drafting of the proposed conditions has been to avoid overlapping certification and monitoring requirements for

the various management plans with intention being to require one of the statutory authorities to approve the applicable management plan, and for this certified version to then be adopted by the other statutory authorities to ensure that there is consistency but also a streamlined process. It is agreed that there is benefit in the cross-referencing of the various management plans between the conditions administered by QLDC, DoC and the ORC and further discussions about how this works in conditions is anticipated.

Landscape values

67. A number of submitters have emphasised the location of the subject site between the two Outstanding Natural Landscapes of Lake Wakatipu and the Remarkables and recommend additional landscape works along the State Highway 6 (**SH6**) boundary and/or for the provision of greater setbacks for development from SH6 to screen or minimise the views of the subdivision.
68. Many of these submitters also reference the level of screening provided along the SH6 frontage of Jacks Point, Oraka and Hanleys Farm as what should be provided along the Homestead Bay SH6 frontage. These existing examples utilise a mixture of landscape options to provide screening and softening of views of the built form including dense linear and hedge planting along the SH6 boundary of Ōraka with buildings being setback between 12 – 30m; large setbacks ranging from approximately 60m – 250m, mounding/existing landform and vegetation along the Jacks Point SH6 frontage and mounding and vegetation along the Hanleys Farm frontage.
69. The landscape values of the subject site have been assessed as being different to those for Jacks Point and Hanley's Farm as both of these subdivisions are formed within the valley, with views from SH6 across the sites having the backdrop of Jacks Point Hill and Peninsula Hill, however the views of significance in relation to the subject site are across the site towards the glimpse of Lake Wakatipu and the mountains beyond. Consequently, the landscape and urban design of the proposed development has sought balance between maintaining these view connections across and through the site, whilst providing landscape mitigation to soften the visual effects of

the buildings. It is noted that the diversion of flood flows from the upstream Remarkables catchment is also provided for within the SH6 setback area via a swale.

70. The Landscape Effects Assessment (Appendix FF) concludes that *"the proposed 40 - 75m wide open, native vegetated buffer area alongside SH6 will appear similar to the highway treatment within Jack's Point, Hanley's Farm and Ōraka / Lakeside Estates. This will mitigate the perception of future urban development being seen as sprawl (6.3.4.4), providing for a continuous outlook along the entire western side of the highway between the new roundabout into Park Ridge and Ōraka / Lakeside Estates, whilst maintaining the views to the surrounding mountains when viewing from SH6"*.
71. It is considered that the design of the proposal will respect the values of the adjacent Outstanding Natural Landscapes and will provide the necessary balance of maintaining views through the site while mitigating the visual effects of the future built form.

Transport

General

72. Many of the submissions express concern as to whether there is sufficient investment planned for transport in the corridor as well as throughout the wider network as a result of population increase and areas of congestion. A number of the Jacks Point residents also seek that transport investment (roading, bridges, cycling routes) should be made before there is any further residential expansion within the corridor. However, as discussed in the initial WSP Transportation reporting (Appendix GG), this doesn't reflect the reality of how transport infrastructure is typically built in New Zealand whereby projects are typically funded and built once a need is well established, frequently via observed congestion.
73. Paragraph 4.2 of the NZTA's submission states the following:

In Appendix GG of the Application, it is noted that, for the Southern Corridor to develop in a sustainable manner, considerable investment

in the transport system is required. Table 6-1 in that Appendix lists improvements the author of that Appendix, WSP, considers are necessary. NZTA agrees that a considerable programme of infrastructure is required to manage safety and efficiency effects on the Southern Corridor. WSP notes that this programme will need to be delivered with co-ordinated funding from NZTA, QLDC and ORC and will also likely require investment from Central Government and private developers/entities. Presently, there is no funding pathway for this significant programme of infrastructure.

74. Several points are made below in response.

- Homestead Bay is a small contributor to the need for this overall programme², and that a similar programme of works is expected to be needed regardless of whether Homestead Bay goes ahead or does not.
- Homestead Bay is well aligned with strategic planning at a local and national level. The site has been identified as being suitable for future urbanisation within the Queenstown Lakes Spatial Plan, to which central government (i.e. the owner of the state highway network) was a party. That support continues via the fast track scheduling of the project and the supportive written comments from government ministers. It is to be expected that to give effect to such strategic planning, infrastructure investment will be needed.
- The Land Transport Act (2003) sets out the role of NZTA in maintaining a reasonable level of functionality on the state highway. For example, Section 95 states the following:

95 Functions of Agency

(1) The functions of the Agency are as follows:

- (a) to contribute to an effective, efficient, and safe land transport system in the public interest:

Regulatory functions

- (b) to contribute to establishing, implementing, operating, delivering, monitoring, and enforcing the regulation of the land transport system:

² WSP Transportation Analysis Summary - Appendix GG

- While the exact nature and rate of state highway investment is currently uncertain, it is difficult to imagine how NZTA would be delivering on its mandate without at least some investment to manage state highway travel times were not forthcoming.
- It is understood that NZTA are now preparing a Queenstown Strategic Network Plan which is looking at the future transport infrastructure needs of the area. The work WSP has done for RCL is being utilised as a starting point for much of this work and WSP are involved. As WSP have previously reported, their view is that strong business cases for public investment in the highway network in and around the Southern Corridor are likely to emerge.

75. Therefore, the comment within the NZTA submission that there is “no funding pathway” for transport investments is overstated. It seems more accurate to say that there is no funding currently allocated, but it can reasonably be expected that this situation will change.

76. The proposed development is one of many planned within the Southern Corridor or beyond the Corridor that will contribute to the need for upgrades, including Kingston Village (750 homes), Coneburn Industrial (already zoned), the Remarkables Ski Field expansion into the Doolans (fast track), the development of the Jacks Point Village (consented). There is also additional development potential in the corridor being signalled by the TTSC including an additional 400 – 600 residential lots at Jacks Point, additional Business Mixed Use and Industrial land on the eastern side of SH6 and residential and mixed-use development of land adjacent to Homestead Bay (Jardine's and Homestead Bay Trustees land). Therefore, to the extent that developers are to fund state highway and other transport upgrades, RCL seeks that this be equitable.

77. RCL has offered to undertake a range of transport investments including upgrades to SH6 intersections as part of its proposed consent. The intersection upgrades are significant investments. The combined cost of the intersection upgrades at Jack Hanley Drive and Māori Jack Road were estimated by WSP to be as much as \$27 million. It is noted that the need for these upgrades and

their benefits go beyond the effects of the proposed Homestead Bay development, and there are other developments that are not, or have not contributed. These investments can therefore be seen partially as mitigation of the proposal, but also partially as benefits of the proposal too.

78. The case for the further upgrades / investment recommended by the NZTA away from the Homestead Bay site is less compelling. In respect of the two projects recommended by NZTA in its submission:

- Expanding a section of SH6 from the Park Ridge roundabout to Boyd Road to four lanes makes little sense as a standalone project at this point in time given Boyd Road is not an existing desire line for all but a very small number of vehicles and the potential construction of a bridge at the end of Boyd Road is not yet planned or funded. This work is also likely to be very difficult for a private developer to deliver as it will likely require land acquisition and will become entangled in issues of new intersection designs for other landowners along this stretch, such as at the Remarkables Ski Area and the land identified for future Business Mixed Use zoning and industrial land.
- The case for building a section of bus lane (or possibly carpool lane) from Kawarau Falls bridge south makes more sense as a nearer term project. RCL have considered this in the past with the work undertaken by WSP, however, this area of SH6 is more than 7km from the Homestead Bay site and, again, the contributors to congestion at this location go far beyond the Homestead Bay project.

79. RCL considers that these projects should be publicly led, with fair and equitable funding spread amongst developers and potentially other sources and is happy to continue discussions with NZTA to this end.

80. One way in which funding can be more reasonably spread between developers is via the use of Council developer contributions. Much of the future transport network is likely not to fall within the state highway network, including the "A7 trail" referred to in QLDC's submission and any new river crossing, that may in time be needed.

81. Beyond more traditional government spending, there are also understood to be other options for revenue gathering for transport infrastructure, such as Special Purpose Vehicles under the Infrastructure Funding and Financing Act 2020 and proposed powers under the Land Transport Management (Time of Use Charging) Amendment Bill. It is understood these can be used to generate funding for state highway projects.
82. The NZTA submission also suggested there should be hold points for developments while the SH6 infrastructure upgrades, such as the provision of bus lanes, other intersection upgrades and/or construction of a second bridge over the Kowarau River are completed. This would create an appreciable risk that the completion of the Homestead Bay development might be held up due to the required transport upgrades being delayed (or never advanced) beyond RCL's control, which could potentially erode the benefits of the fast track proposal (chiefly related to construction investment and housing supply).
83. NZTA and others have also raised questions about the applicability of the timing of the proposed SH6 upgrades. The Homestead Bay roundabout providing access to the proposed development is to be completed prior to s224c for the first stage of the development. It will therefore be in place prior to the development of any of the proposed lots.
84. The two further roundabouts / intersection improvements are proposed at Jack Hanley Drive (Condition 47(f)) prior to 600 lots being created, and at Māori Jack Road (Condition 47(h)) prior to 1400 residential lots being created. These triggers have been selected due to this being the points in time that the traffic modelling identifies that the Homestead Bay development will create adverse effects upon the functioning of these intersections.
85. NZTA have queried whether the above trigger levels for the roundabouts/ intersection upgrades at Jack Hanley Drive and Māori Jack Road are correctly set as the analysis excluded growth at Kelvin Heights and Kingston and as such has not included the operational effects from other background growth. WSP (Matt Gatenby) has provided the following points in response:

- The analysis did include background growth for Peninsula Road (i.e. Kelvin Heights) and SH6 South (i.e. Kingston and south) as predicted by the latest QLDC Strategic TRACKS model update as undertaken by Abley to inform the ORC Queenstown Public Transport Business Case (2024) and therefore represents the latest traffic forecasts for these outlying areas.
- The modelling did not include any additional growth within Kelvin Heights or Kingston (or any other parts of the District) that may have been forecast after the latest TRACKS model updates. Nor does it include the currently zoned full land use capacity or any outlying areas that are not yet zoned or were not represented in the most recent model update.
- Consequently, the triggers have been based on the available forecasts at that time. There is a highly dynamic environment in Queenstown, which makes establishing the base futures very challenging however the Applicant has tried to establish a reasonable assumption about what else is built through time. The trigger points are presented as the suitable improvement to mitigate the impact of the estimated traffic levels generated by the development, based on the forecast rate of other growth. If extra growth is assumed elsewhere, then the base situation will change, and that a different form of mitigation may be required – but the scale of mitigation would be similar.

86. There are additional practical considerations with respect to the timing of these upgrades. For example, to reduce disruption to traffic flows during construction, the upgrade at Jack Hanley Drive would ideally follow the opening of a local road connection between Hanley's Farm and Park Ridge which in accordance with QLDC consent RM200615 is to occur before late 2028). Accordingly, the triggers and scale of mitigation are considered appropriate to the impact of the development.

87. NZTA also suggested that a consent condition be imposed requiring the provision of the commercial activities at a specific point in time correlating to the level of residential development. RCL consider this to be unnecessary

as they are also motivated to see commercial activities occur sooner rather than later in Homestead Bay.

Internal roading

88. The QLDC submission identified that the internal street network requires further refinement noting inconsistent shared path widths, insufficient separation from property boundaries and lack of traffic calming measures on collector roads. The following response has been received from Stantec (Andrew Metherall) in response:

- Many of the QLDC comments relate to details that will be further addressed in engineering design stages.
- Section 9.1 of the Integrated Transport Assessment (**ITA**) (Appendix V) describes the shared path design philosophy, and the proposed network is shown in Appendix C of the ITA. Section 10.3 further describes the design rationale. The primary neighbourhood cycle route in the form of shared paths is proposed to be well separated from the boundaries. Other secondary shared paths are to provide further support for movement and connection, where cycle lanes and cycle paths are otherwise not justified. No cycle lanes are proposed as they are considered to be out of context for this location, road traffic volumes, and user types.

Only the external entry point on Road 01 east of Road 02 to the SH6 roundabout has a 2.5m wide shared path, as it will connect to external recreational paths (and can be modified through detailed design as required in consultation with NZTA/QLDC), all other shared paths are 3.0m wide. The primary path network either has no vehicle crossings or is separated by 3m from a property boundary ensuring safe usage. In addition, the Road 01 residential Spine Road shared paths have no vehicle crossings (lots are rear loaded or served by right of way), again supporting safe usage.

The secondary shared path network predominantly has separation from boundaries at 1.3m-1.5m, with a low usage part of Road 05 and Road 16 having 1.0m. Whilst lower than desirable, these roads if only served by footpaths (as could be justified based on demand) would likely be closer to the boundary and still have demand from local users.

The proposal is considered a balanced outcome, whilst maintaining a path network that supports connectivity to the primary path network. Absence of front fences can assist with maximising safety outcomes, and that is proposed in the building controls.

- Expected operating speeds are assessed in Section 10.6 of the ITA. As noted, a range of land use, road design, intersection control (Section 10.9 of ITA), and pedestrian facility treatments (Section 10.10 of ITA) are expected to enable an operating speed of approximately 40km/h on the Collector Road network. ITA Section 17 also recommends safe system treatments to support target operating speed environment, which is a matter for engineering design. It is noted Hanley's Farm operates with speed limits of 40km/h also to reinforce the operating speed.
- The ITA at section 10.4 sets out footpath width rationale. 1.5m footpath widths are adopted on local streets as per QLDC Subdivision and Land Development Code of Practice.

89. ORC's transport memo states that future proofing the infrastructure to support larger vehicles and more frequent services is necessary. This is considered to be a matter for detailed engineering design. However, it is acknowledged that the boundaries of proposed Lot 410 at the corner of Road 02 and Road 03 are constrained if an articulated bus is to be used and this would need to be modified through detailed design.

Homestead Bay Road connection

90. A number of submissions including the submissions from QLDC, NZTA and Dick and Jillian Jardine (**Jardine's**) express a desire to see the road connection to Homestead Bay Road occur sooner than is currently proposed.
91. The proposed staging of the southern part of the subdivision is affected by the presence of the NZone airfield and associated noise sensitivities. The Jardine's entered into the lease with NZone when they owned the land and the 2031 expiry was set at that time.
92. The basis of the proposed trigger of 1200 lots being created prior to this connection being required relates to an estimate of how quickly the Applicant thinks that the connection can be made given logical staging of the development taking into account the required underground and aboveground infrastructure and the need to limit the extent of the earthworked areas at any one time. In fact, the 1200 lot trigger is earlier than would be ideal if these matters were the sole consideration.
93. It may be viewed that the formation of a connecting road is a relatively simple matter however this goes hand-in-hand with the installation of the infrastructure below and adjoining the road. It can also be financially burdensome and give rise to future complications if roads are built well ahead of when development can connect to the infrastructure that follows those roads.
94. The QLDC's written comment also recommended that a footpath connection be provided along the frontage of Lot 12 to connect to the existing footpath that stops at the corner of Homestead Bay Road and Jacks Point Rise. This connection is a good idea and the Applicant is happy to propose a condition to this effect, noting that depending on final design it may need to connect to an existing Council reserve.

Jacks Point roading and SH6 intersection

95. NZTA has recommended changes in their submission to the proposed condition relating to the provision of the upgrade of the intersection /

roundabout of Māori Jack Road and SH6 stating that RCL should also fund the acquisition cost. The Applicant is reticent on this point but is happy to discuss further with NZTA.

96. A number of submitters sought to confirm that construction vehicles for Homestead Bay would not utilise the Jacks Point roading for access. A condition of consent is proposed in Appendix T (Condition 20) stating that there will be no construction access to the site through Māori Jack Road and Homestead Bay Road at any time. Proposed condition 19 also details the approval process for the construction access via SH6 and this/these access points will be the only point of access into the site for construction.
97. A number of the Jacks Point residents comments also stated that Jacks Point roads are already operating at capacity during peak hours and that they are experiencing congestion and further traffic from the proposed development will exacerbate this. This point lacks evidence, having not been identified in any reporting seen by the Applicant.
98. Maja and Andrew Marshall from Jacks Point requested that the only connection between Jacks Point and Homestead Bay should be via public transport, cycling and walking only for the abovementioned reasons, as well as the maintenance burden on the Jacks Point Residents and Owners Association (**JPROA**). A roading connection between the proposed development and Jacks Point is good urban planning in enhancing connectivity, reducing travel times and carbon emissions and this is promoted through objectives and policies in the Queenstown Lake Proposed District Plan, the National Policy Statement for Urban Development (well-functioning urban environment) and is sought by the TTSC.

Connection to Chief Reko Road and Safety

99. The proposed roading connection to Chief Reko Road is outlined in the AEE as indicative only due to it currently not being a vested road. As noted in the Homestead Bay Residents Society Incorporated submission, this right of way is currently limited to the provision of access for the 12 residential lots only, however there is an instrument on the title (11142413.8) that anticipates

vesting as public road in the future (and obliges the grantees to consent to the vesting), therefore it was considered best to allow for the connection if it can be made at a later date. This road stub could be formed as a section of unformed road and if/when Chief Reko Road is ever vested, a later connection could be made.

100. The ORC Transport memo also recommends consideration of an additional link to the future Homestead Bay Village further to the southwest, however the existing land ownership and topography do not enable a feasible connection through in this location.
101. The Homestead Bay Residents Society Incorporated also raised concerns about the connection of Proposed Road 1 to Homestead Bay Road and the proximity of this connection to the Chief Reko Road alignment. The proximity of the proposed connection and the Chief Reko Road connection to Homestead Bay Road is covered in Section 9.4 (Homestead Bay Road access) and Section 17 (Recommendations) of the ITA. It is proposed that through engineering design the operating speed of Homestead Bay Road between Road 01 and Chief Reko Road is reduced from 40km/h to 30km/h to support a 5 second separation at the operating speed. An indication of a concept design to achieve that (generally aligned with the existing road formation) is shown with a raised table intersection treatment in **Appendix E**.

Public transport

102. The ORC transport memo states that further consideration of staging of public transport is required. It is proposed that the public transport commence by accessing the Homestead Bay site via SH6. This is consistent with the approach utilised for the existing bus operations at Hanley's Farm and Jacks Point, with the intention that the bus services will extend directly through the various developments including Homestead Bay in the future as the connectivity evolves over time.
103. The public transport route proposed is considered to provide a suitable level of access to public transport through the site. Various options have however been outlined within the ITA (Appendix V), and this can be further discussed

through engineering design once the Council's preference is identified, either as an interim or temporary route option.

104. Some submitters have sought greater consideration of a public transport hub or Park and Ride on the subject site. The demand / benefit of this is not clear to the Applicant, as the potential users appear to be a fairly small number of commuters from the south (Kingston etc). Nevertheless, the proposal does not preclude this as a possibility. As discussed within the AEE, the Applicant is happy to discuss this further with QLDC and it is not considered to be a matter which needs to be tied into the consent process.

Parking

105. Some submitters, including the NZTA have recommended that on-site and/or on-street parking should be limited whereas others, including a number of Jacks Points residents state there should be strict controls on the provision of suitable on-site parking to cater for the demand on the site.
106. Limiting parking within roads is unlikely to be an effective method of controlling private vehicle use and may result in unintended consequences such as illegal parking on road berms and neighbouring areas. More effective ways of encouraging lower private car ownership would be facilitating and funding regular public transport, residential parking permits and time of use charging on SH6.

Walking and cycling connections

107. In their written comments QLDC has stated that the active travel trail does not connect into the neighbouring subdivisions. However, there are proposed active travel linkages to SH6, to Homestead Bay Road and also to Chief Reko Road (if this is vested in the future) shown within the ITA (Appendix V). These also link to the recreational trails proposed within Lot 12 connecting to Jacks Point.
108. The only neighbouring subdivision that active travel connections are not being made to is Ōraka. This was shown on an initial plan however it was

removed following initial consultation with Ōraka residents who advised that the easement that previously existed for this purpose had been removed. There is therefore no legal right to connect a trail to Ōraka, nor is there an apparent desire from Ōraka residents for this connection.

109. The proposed development includes cycling and pedestrian connections within the development but also links towards the lake and to Jacks Point. These will provide access to the existing roading, shared path and trail network within Jacks Point and Hanleys Farm which is part of the A7 trail in the Wakatipu Active Travel plan.
110. Many of the adjoining Jacks Point residents and the JPROA have sought that the walking and cycling trails be practical, safe and realistically achievable between Jacks Point and Homestead Bay. The proposed conditions of consent include a requirement (Condition 13(g)) that prior to works commencing for each stage, the detailed design of the trails are provided to QLDC for review and acceptance and that these need to meet the Grade 2 standard in the QLDC's Tracks and Trails Guidelines, unless otherwise accepted by the QLDC.
111. The QLDC submission states that the placement of walking trails within or directly adjacent to the gullies risks degrading habitat values and undermining the natural stormwater function intended under the TTSC structure plan. Therefore, the public access through the gullies is not supported by the QLDC. This comment appears to be at odds with the outcomes sought through the QLDC's draft Blue-Green network plan where connections to surrounding natural environments is considered to foster a strong sense of community and belonging and to improve accessibility to, through and between open spaces and key destinations as detailed below³:

“The importance of protecting and providing access to natural environments and outdoor recreation space within and around urban settlements is recognised. These spaces foster a strong sense of community and belonging while expressing the unique characteristics of

³ Page 10 of the draft Blue Green Network plan

a particular location. Better integration of connections (active travel, trails, ecological corridors etc) will improve accessibility to, through and between open spaces and key destinations. Connected networks are required for access, waterways and biodiversity, so it makes sense to plan these networks in an integrated way. This also allows for expression of cultural values and protection and enhancement of unique local characteristics. A diverse mix of open spaces will ensure both environment and community/human needs are met as built development and urban form evolves."

112. Without the trails provided within the Southern and South-western gullies, direct access to Lake Wakatipu for the residents of the subdivision will be limited to the singular access point in the vicinity of the bore.
113. The Southern Gully in particular, is very large and wide and it is expected to be a key desire line for future residents heading to the lake. Not providing a trail in this location will highly likely lead to residents forming their own informal tracks which will be less safe in their formation and may result in greater ecological effects as paths may be cut through the native vegetation.
114. The South-western gully is tighter in terms of space and this gully is also to be utilised for the relocation of the lizards from the larger site, albeit separated from the area where the trail is to be formed. The trail from this gully could be removed with access to the lake being provided on the southern side of the gully via the road connecting to the trail that extends to the bore site. This could be a matter for further investigation in detailed design and a condition of consent can allow flexibility for this.
115. Overall, it is not considered that existing ecological values are sufficient to justify limiting public access to these areas. Indeed, there are likely to be benefits in trails in these areas in allowing ready access for establishment works, weeding and pest control.

Acoustic effects from SH6

116. NZTA have sought a change to the proposed condition of consent relating to the acoustic treatment of residential and other noise sensitive activities adjacent to SH6. This change is accepted and will be included in the next update of the proposed conditions of consent.

Servicing

General

117. Some of the Jacks Point Residents submissions sought for all three waters infrastructure to be established and proven prior to residential development occurring, clearly defining staging, setbacks and maintenance responsibilities. This will be achieved through the proposed conditions of consent (Appendix T). Under the proposed conditions (which generally reflect QLDC standard conditions), all of the required infrastructure for each stage will be subject to the Engineering Review and Acceptable process by the QLDC. This is where all of the designs and specifications are reviewed by the QLDC to ensure that they meet the consent conditions and will work in practice. Once these designs and specifications are approved then they are implemented on the site with the QLDC undertaking subdivision inspections at specified stages of the development. Prior to the issue of s224c (subdivision completion), the QLDC will undertake a further review of all of the work that has been completed to ensure that the conditions of consent have all been met. All of this work is done prior to any of the lots in each stage being created and means that when the lots are created they will have suitable connection to water, wastewater and stormwater as well as roading.
118. QLDC suggest in their submission that RCL cannot meet the Overseas Investment Office conditions as a result of the proposal for self-sufficient water and wastewater infrastructure. This is not considered to be relevant to the Panel's consideration of the Fast Track application, but for the record, RCL disagrees with this opinion.

Water

119. QLDC favour extending the reticulated potable water scheme from the north to service the proposed development. From reviewing the available information associated with the TTSC process, this would appear to require several upgrades that are some way from completion. It is also uncertain whether such an option makes financial sense for the Applicant. Development contributions for the Southern Corridor in respect of water are high at \$9,714 excluding GST per lot. Across the entire development this will accumulate to a considerable sum. The scheme proposed by the Applicant would be much cheaper whilst still offering a secure, quality supply as endorsed by the ORC peer review process.
120. The Applicant is open to vesting the water supply and infrastructure with QLDC – or at least interconnecting the systems at the opportune time, which may make financial sense and help sustain resilience. However, it is noted in the QLDC submission that this is not supported.
121. Consequently, for timing and financial reasons the Applicant continues to seek approval for the on-site groundwater potable water supply along with the associated infrastructure, water treatment plan and reservoirs. Notwithstanding, the Applicant accepts that an either/or condition as proposed by the QLDC is a good idea to allow the possibility of connecting to the future extended QLDC potable water supply or for the utilisation of the on-site water supply option.

Wastewater

122. The majority of the written comments received raised concerns with the wastewater servicing of the proposed development. The QLDC, the Jardine's, Homestead Bay Residents Society Incorporated, the JPROA and Jacks Point Group all would prefer that the development is connected to QLDC's reticulated wastewater network and an independent review of the proposed on-site system has also been requested by many submitters.

123. The Fast Track application as originally submitted only proposed the on-site disposal of wastewater. As a result of discussions with the QLDC's TTSC team, the application was amended on 19 September 2025 to include the option of connecting to QLDC's network. Consequently, the application currently seeks flexibility through consenting both options for the development, however at this time the prospect of the full development connecting to QLDC's network looks unlikely.
124. By way of background, when Lot 8 was purchased in 2022, RCL engaged with the QLDC on potential necessary upgrades of the wastewater network to accommodate growth in the Southern Corridor. QLDC staff and the Mayor at the time advised that due to issues at the Shotover Treatment Plant, on-site treatment and disposal within the corridor should be investigated. Further, in 2023, the QLDC advised RCL that there are known capacity constraints in the network including constraints and issues with the Shotover Treatment Plant and disposal and as a result, options that consider wastewater disposal within the corridor needed to be explored further. This work was undertaken by RCL and the fast-track substantive application was lodged on this basis. Furthermore, the pre-application consultation undertaken with the QLDC did not highlight the now strong preference for connection to the Council's network.
125. Following the lodgement of the substantive application, the QLDC released its draft TTSC. The TTSC surprised RCL in concluding that connecting to the existing wastewater network was favoured. Through the consultation phase of the TTSC, RCL engaged with QLDC on this preference and sought more information around the technical analysis that had led to this recommendation. This was not available at the time and has only been provided to the Applicant last week (30 October 2025). Given that the Homestead Bay team has been preparing the response to comments there has not been the time to analyse this information in depth. However, from what has been read so far, the conclusions in the provided technical reporting are still quite preliminary, being subject to further technical investigations and cost analysis.

126. In parallel, there continue to be unresolved issues with the Shotover Delta wastewater disposal system, with its temporary consenting status unresolved and the long-term disposal approach still to be decided by QLDC.
127. Whilst the QLDC's strong preference is for the connection of the development to the QLDC's reticulated network, the QLDC's submission recognises that their system is not yet ready for the development to connect stating (emphasis added):
- "Ultimately the Council opposes the on-site option and supports an option where the Application site is **eventually** connected to Council's reticulated infrastructure."*
128. Accordingly, QLDC recommends a condition requiring that the Applicant enter into a Developers Agreement with the QLDC for the required upgrades, timing and funding. This as a standalone option is not acceptable to the Applicant as this may result in delays to the commencement and rate of development planned by the Applicant. This has been the experience of a number of RCL's consultants on other projects where infrastructure negotiations with QLDC have been required.
129. RCL is open to negotiating a developer agreement with the QLDC with regard to details such as cost sharing, development contribution credits, infrastructure sizing and the like, for the possible connection to the QLDC network, however, does not agree to a condition requiring a developer agreement for the right to connect to the network.
130. Emphasising the concern that RCL has as to the readiness of QLDC to accept a connecting wastewater scheme are some matters advised in their comments on RCL's proposal. These include opposition to RCL's recommended route along SH6 to Hanley's Farm, favouring instead another route through Jacks Point that lacks legal access, and resistance to RCL utilising any of the forthcoming capacity resulting from the Hanley's Farm pump station upgrades. RCL finds it difficult to foresee a viable scheme in those circumstances.

131. In summary, it is clear to the Applicant that the QLDC is not in a position to agree to the Homestead Bay development connecting to its wastewater network at present and in the near future due to engineering and/or land ownership constraints. Accordingly, the option of an independent system looks more likely to be pursued, at least for initial stages. It is acknowledged and accepted that QLDC has now made it clear that it has no interest in owning such infrastructure.
132. RCL are still willing to try to work towards reaching an agreement with the QLDC on connecting the full development to the network, however, realistically, such an agreement would need to be reached by the time consent is issued (currently scheduled for 18 February 2026) for this to be an option that RCL can pursue. Accordingly, at this point in time, consent is still sought for the on-site wastewater option as well as the connection to QLDC's wastewater network.
133. The Jardine's preference for the connection of the development to the QLDC's reticulated network is to ensure that the development potential of their property can be realised. The concern raised is that without the Homestead Bay development being connected to the Council network, there is no certainty that the Council's network will be extended to their property due to its reduced financial viability, and also no certainty that they could connect to the proposed Homestead Bay wastewater treatment plant. Furthermore, they would have to set aside land for land treatment.
134. Some of these points are also raised by QLDC in their submission, who add that they consider an economic assessment on such matters should have been carried out. The Applicant however has not been provided with the type of analysis and costing of scenarios that would support the above conclusions relating to the negative effect upon the financial viability of the network. In any event, given the network constraints outlined in the QLDC's written submission, it is unclear whether any credible economic assessment of the alternatives could be undertaken without including consideration of RCL's proposed on-site scheme.

135. As recommended by the majority of submitters, the proposed on-site wastewater disposal system has been peer reviewed as part of the preparation of the application. It has also been the subject of peer reviews undertaken by SLR on behalf of the ORC. These peer reviews are attached to the ORC's written comment.
136. The ORC's written comment states that the majority of the initial concerns raised in the original SLR peer review have been satisfactorily resolved following further information being provided. The ORC have said that there are however two issues that remain:
- *The Applicant has proposed a lower wastewater discharge quality in their volunteered consent conditions than was proposed within the application and which formed the basis of the assessment of effects.*
 - *The Applicant has not agreed to include two nearby community supply wells within their otherwise extensive water quality monitoring programme.*
137. These points have been addressed in detail in the LEI memo attached as **Appendix F**. In summary, for the first point, it appears that there has been a misunderstanding with the proposed conditions in relation to the wastewater treatment plant discharge concentrations, nutrient loading and the assessment of effects and this is clarified in the attached memo.
138. As also detailed in the attached memo, the two nearby community supply wells are not under the control of the Applicant and would require permission from others to test at these locations.
139. Jacks Point Group, the JPROA and some Jacks Point residents outlined concerns as to how the proposed on-site wastewater system could operate without compromising the existing Jacks Point system. Jacks Point Group and the JPROA also submitted peer reviews of the proposal and their submissions appear to be essentially seeking a downsizing of the on-site scheme with the following recommendations being made:
- a) Reduction in the number of dwellings system consented and designed for.

- b) Exclusion of the JPROA overlap area from the RCL proposed primary land disposal area and allocation of a minimum 25% reserve land disposal area (instead of just 10%).
 - c) The maximum irrigation rate should be 8.0mm/day (not just a monthly average).
 - d) There should be 3 monthly maintenance inspections (not 12 monthly).
140. The LEI memo attached as **Appendix F** addresses the concerns raised within the peer reviews undertaken by Ormiston Associated Limited and show that the above recommendations are not required to be implemented or are already provided for in the proposal.
141. The Applicant disputes the idea that because they have not, for unrelated reasons, sought full land use consent on the commercial, medium and high density "superlots", this constitutes "resource banking". The proposal has been designed to establish a realistic yield for the full future development anticipated on the site and it is considered that it would be more problematic to show a part system for only a portion of the full anticipated development of the site. As mentioned earlier, there are various paths to achieving land use consent on the proposed superlots and it is considered reasonable to expect that these lots will be developed as such in the future. Consequently, obtaining approval for the full scheme is seen as prudent and is little different from the adjacent Jacks Point scheme where large areas of wastewater disposal were consented based on the estimated yields of indicative master plans for the residential and village areas.
142. Jacks Point Group, the JPROA and some of the Jacks Point residents have raised concerns as to the overlap of the proposed land treatment areas with the existing easements and consented areas in favour of the JPROA and an easement agreement for the same with Jacks Point entities. Of note, the easement rights within the existing and proposed instruments explicitly allow for rights to be granted to other parties on the same or similar basis. The Applicant is simply seeking to maintain flexibility to use this area - on a temporary or ongoing basis - if other parties such as the JPROA have no need to use it.

143. Jacks Point and the JPROA's need for this area is currently uncertain to the Applicant. The overlapping area appears to have been consented in the expectation that the area would be required to service the future Jacks Point Village developments, however the Village lots have all been consented at the time of subdivision to connect to the QLDC network as detailed in Section 5 of the AEE.
144. Any intention by the Applicant to use this overlapping area would need to be considered in due course, in consideration of the circumstances at the time and ideally having consulted relevant parties. The easement area is not expected to be utilised as part of an early stage, nor does the Applicant expect to be reliant on the area to deliver the scheme, as the flow rates being utilised for the modelling are very conservative and it is expected that the verification via stage-by-stage monitoring will show that not all of the 28.5ha of land treatment area will be required.
145. In the end, if RCL is not able to utilise the overlapping area, it is possible that amount of available land for disposal could become a limiting factor on the size of the disposal scheme, meaning full use of the of average 2,005m³ per day of wastewater disposal may not be achieved. The proposed conditions are set up such that with the stage-by-stage verification of flows and available land and infrastructure, it will be quite apparent if such a practical limitation has been reached. Under such a circumstance, it is possible to envisage the scheme being around 80% of the size of the upper limit that has been assessed. RCL are comfortable that such an outcome would meet its needs. As covered in the initial application documents and reiterated in the attached LEI memo (**Appendix F**) there has been considerable conservatism built into the preliminary design of the scheme. Given that QLDC have clarified that they have no intention of taking ownership of the scheme, its Code of Practice flows seem less relevant as design criteria now.
146. Many of the Jacks Point residents expressed concerns relating to the maintenance and ongoing monitoring of the proposed on-site system. The proposed conditions of consent for the wastewater discharge however are a modified set of the Jacks Point discharge conditions with lower triggers for the commencement of additional monitoring and investigations. These

conditions require regular monitoring of groundwater quality and results are required to be submitted to the ORC regularly.

147. The comments from Fish and Game about the applicability of the permitted baseline in respect of nitrogen discharges from the wastewater discharge due to RMA changes are noted. This change was made 21 August 2025, well after the substantive application has been lodged. Regardless, the more important point in the assessment of the potential effects in relation to the discharge, is the similarity between the nutrient profile of the existing farming operation and the proposed scheme which is considered to provide a real world comparison of the proposal vs the existing effect.
148. A number of submitters also raised concerns about trails near the proposed land treatment areas. These areas are designed to be fit for recreational contact and it is noted that the JPROA has various land treatment areas already adjacent to trails and ROW easements, including on Lot 12.
149. Some submitters outlined concerns about the potential risk of contamination of the existing water supplies by the proposed on-site wastewater disposal system. There are both bore water supplies and surface lake water supplies within proximity of the site. The potential adverse effects upon the existing water supplies have been addressed in the Komanawa Solutions report provided on 19 September 2025 (Appendix B – Engineering Feasibility Report – Part 5) and the Land Water People (Appendix HH). These reports have also been peer reviewed by SLR on behalf of the ORC and the proposed wastewater disposal system has been assessed as being able to maintain the water quality of these drinking water supplies.
150. A number of submitters queried the findings of the Odour Assessment (Appendix OO) of the application with regard to the prevailing winds, inversion layers and also the incorrect location of the wastewater treatment plant shown in the report. An updated report is provided in **Appendix G** which still confirms that compliance with the Regional Air Plan can be achieved.
151. While the wastewater treatment plant location is further north than originally assessed, and closer to Jacks Point, the updated reporting shows that odour

concentrations remain compliant with the Regional Air Plan. This is primarily because of the odour treatment at the proposed wastewater treatment plant location and there still being sufficient separation.

152. Some submitters have also raised concerns about the spread of odour in high winds. The high wind conditions have been taken into account in the modelling and the modelling shows that it is actually the no-wind conditions that are the critical case for potential odour effects. Regardless, the proposal is shown to be able to comply.
153. Overall, the on-site disposal has been assessed as being suitable by the ORC subject to clarification of two points (provided in **Appendix F**) and minor amendments to the proposed conditions of consent. Consequently, this is a viable option to service the development.
154. Fish and Game's submission states that the application does not adequately address emerging contaminants found in urban stormwater and wastewater, however an assessment of this was provided in the updates to the application on 19 September 2025 in Appendix B – Engineering Feasibility Report – Part 5. This has been peer reviewed by the ORC and its conclusions accepted.

Stormwater

155. Stormwater creating pollution and contamination of Lake Wakatipu was raised by a number of submitters including Fish and Game, and the QLDC and Fish and Game also state that the Regional Water Plan is outdated and its relevance to giving effect to the National Policy Statement for Freshwater Management should be weighed accordingly.
156. Stormwater quality controls are addressed in Appendix B – Engineering Feasibility Assessment – Part 1 of the Fast Track application. The proposed stormwater quality measures are to conform to the QLDC's Code of Practice and they have been the subject of peer review by the ORC. Furthermore, the proposed stormwater discharges do not require consent as they can meet the permitted activity requirements of the Otago Water Plan for

stormwater discharges. Regardless, the monitoring of heavy metals within the surface waterbodies has been volunteered as part of the monitoring to be undertaken for the wastewater discharge as recommended by SLR on behalf of the ORC.

157. Fish and Game also state in their submission that the enforcement mechanisms for non-compliance to the proposed water quality parameters at the discharge point are inadequate. It is understood that this comment refers to Section 5.7.3 of Stantec's EMP which covers what happens if there is non-conforming test samples on stormwater discharge during construction; and it does not cover the final constructed stormwater outlet quality.
158. As stated in the EMP, re-tests will be done within 5 working days consistent with conditions imposed on recent ORC consents for similar scale earthworks projects. The earthworks controls and monitoring will conform with the ORC conditions that are imposed on the consent and the EMP will be updated as per those requirements if necessary. If required, this may include a more detailed process for actions if a non-compliant test is found. Furthermore, the Adaptive Management Plan also covers the additional monitoring that will be undertaken and the trigger events that will apply to provide some further reassurance on the additional level of monitoring and management to ensure discharge from the site meets the minimum requirements.
159. QLDC have also submitted that the long-term maintenance responsibilities of the stormwater network have not yet been confirmed. If the network is not to be vested in QLDC, the ongoing maintenance arrangements for the infrastructure will be required to be confirmed prior to the issue of s224c under Condition 7 of the proposed conditions (Appendix T). This is not considered to be a matter that needs to be addressed up front in the process.
160. Fish and Game seek that stormwater run-off does not change the quantity of water being discharged into the lake compared to the existing pre-development conditions particularly given the extent of earthworks proposed and the anticipated level of hard surfaces. Fish and Game also prefer the use of nature-based solutions to achieve this outcome. Stormwater

discharge was addressed in Appendix B – Engineering Feasibility Report. Section 4.5 of this report states as follows:

“The increase in peak runoff rates to downstream channels of Southern and Southwestern Creeks resulting from the development will be minimal because the upstream catchment runoffs are far greater and are expected to peak at a different time. Further, no attenuation of peak flow is needed for discharge from the stormwater channels directly to Lake Wakatipu because of the minimal contribution of flows from the Homestead Bay development area to the much larger catchment of the lake.

However, where downstream property could be affected, control of discharges will ensure peak flow does not exceed predevelopment flow rates.”

161. The Homestead Bay Residents Society Incorporated raised concerns that the stormwater design does not take into account the smaller gully to the north of their properties. However, the proposal does take into account the gully the submission refers to. Drainage from the area of the existing gully that is to be developed as housing will be to a new pipe network, diverted away from the downstream neighbouring property in Nathaniel Place. Section 4.5.3 of the Stantec “Infrastructure Feasibility Report” (Appendix B) should be referred to for information on this.
162. The drainage gully identified in the submission of Homestead Bay Residents Association is shown as Outlet 6 in the Stantec Report. This report includes the following figures showing pre- and post-development catchments and Table 4.4 in the Stantec report shows that existing flows will be reduced by up to 50% following development.

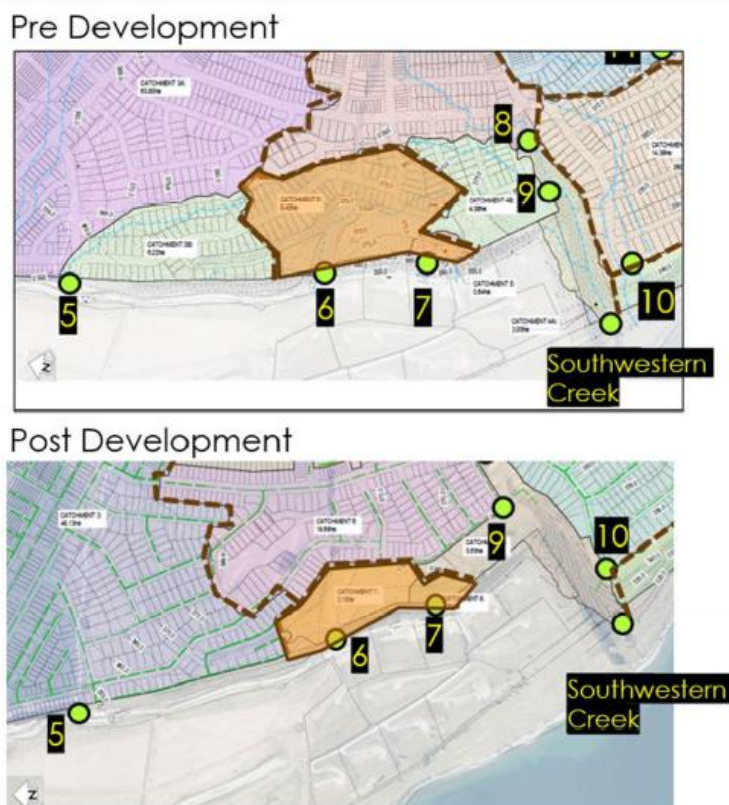
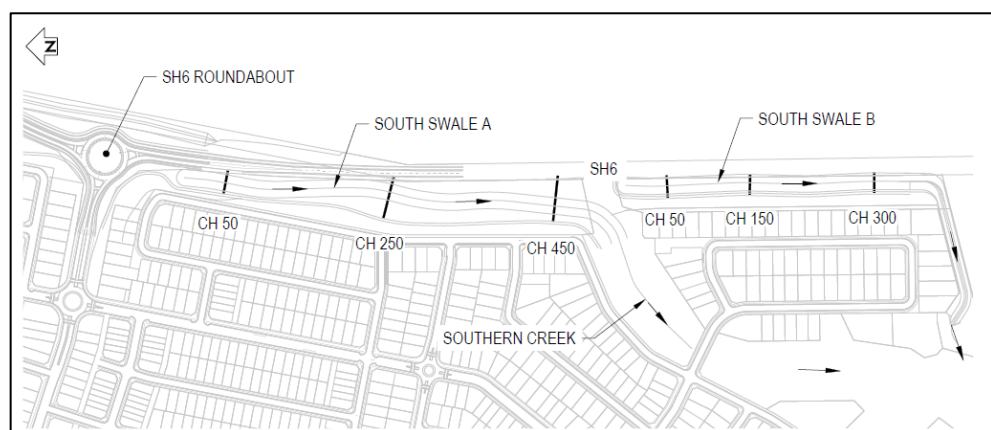


Figure 4-14: Outlets 5, 6 and 7 each drain to an existing culvert under Chief Reko Rd - Pre and Post Development Catchments showing reduction in catchment area

163. Brett and Mary Holland have sought confirmation that their existing stormwater discharge on to Lot 12 will not be affected by the proposal. The QLDC GIS records show that there are ten lots on Jacks Point Rise, Brett Lane and Hackett Road that have laterals draining into or towards Lot 12. All of these are 150mm PVC pipes. Part of this area (and some of the existing outlets) drains down to the existing Jacks Point land treatment area and there is no development proposed in this area other than potential new land treatment areas.
164. Surface cutoff swales are proposed at the upper margins of the treatment areas to divert overland flows so that these do not add to treated wastewater volumes. These surface swales will also contain and divert any flow from the existing outlets from the private properties. Therefore, the discharge from 4 Brett Lane (and similar property outlets) will not be affected.
165. NZTA have requested that the height of the bund and the rate of stormwater discharge through the diversion channels along the SH6 frontage of the

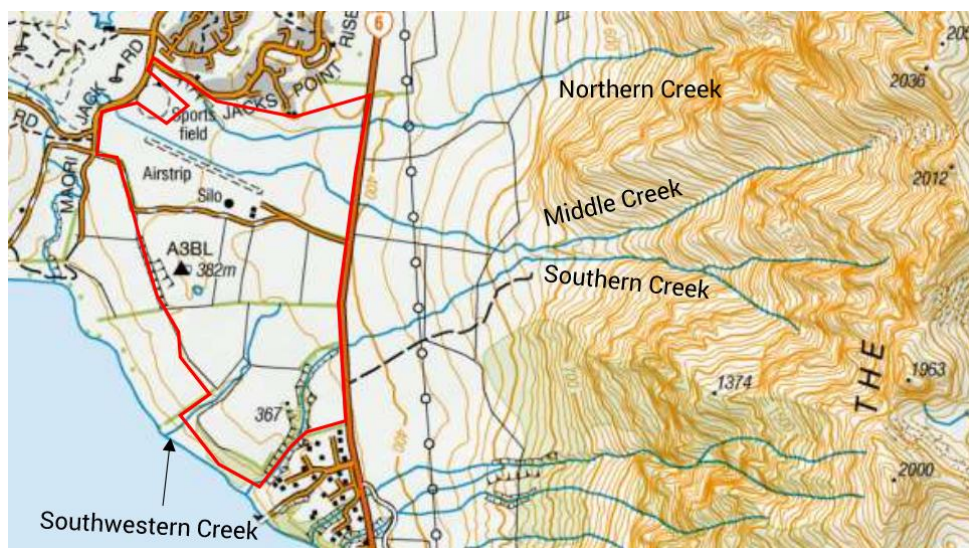
subject site be designed and constructed to ensure 250mm of freeboard is maintained at all times with the edge of the SH6 pavement formation and there is no standing water within a 1m horizontal offset to minimise the risk of pavement saturation. Stantec have provided the following confirmation that this can be achieved:

- The typical section the submitter has used is for a 100yearARI event with snow and debris. The water level shown would only occur briefly and rarely and is unlikely to saturate the pavement.
- Further sections at actual locations are shown in Stantec drawings 310104425-00-000-C0274 to C0275
- Six cross sections along Swale A and B (three from each swale) have been created to assist in responding to this RFI. The location of each section can be seen below.



- Multiple ARI events were assessed and are listed below. The peak runoff information was received from the Geosolve Natural Hazard report (Appendix B) and via email from Geosolve for the ARI1.58 event. The flows shown assume that Middle Creek and Southern Creek have combined which is very conservative (see figure below).
 - ARI 1.58
 - 6.3m³/s
 - ARI 20
 - 21.4m³/s
 - ARI 100
 - 37.8m³/s
 - ARI 100 with snow melt
 - 43.4m³/s

- ARI 100 debris flow
 - 51.7m³/s



- Each cross section was assessed using the software package Flow Master which determined the flow depth at each cross section for each ARI event. The freeboard was then calculated at each section and can be seen in the below table. This freeboard is from the edge of to the top of the water level. All cross sections therefore provide more than 250mm freeboard up to the 1 in 20year event. This is an appropriate level of freeboard and the pavement will only be wetted for a short period in an undefined event between ARI 20 and ARI 100. The freeboard will be more than shown due the conservative approach of assuming that Middle Creek and Southern Creek have combined for all ARI events.

Cross Section	Freeboard to Edge of Seal				
	ARI 1.58 (m)	ARI 20 (m)	ARI 100 (m)	ARI 100 with Snow (m)	ARI 100 with Debris (m)
Swale A Ch 50	0.966	0.456	0.126	0.026	-0.124
Swale A Ch 250	1.838	1.378	1.078	0.998	0.888
Swale A Ch 450	1.559	1.159	0.899	0.829	0.729
Swale B Ch 50	1.576	1.086	0.756	0.666	0.546
Swale B Ch 150	1.175	0.675	0.345	0.265	0.145
Swale B Ch 300	1.475	0.975	0.655	0.565	0.445

- It is considered that provision that has been made is adequate and is preferable to steepening the batters within the channel area which would be needed to otherwise lower water levels.

166. NZTA have also requested that conditions be imposed for minimum maintenance actions and frequencies for these diversion channels to ensure

that appropriate routine maintenance is undertaken should these areas not be vested in the QLDC. The Applicant supports this and these updates can be made in the next update to the proposed conditions of consent.

Electricity

167. Many of the Jacks Point Residents highlighted the forecast energy issues that are anticipated for the District and how this will be resolved. Confirmation was supplied within the application from one of the potential suppliers that they are in a position to supply the site.

Construction effects

168. A number of the Jacks Point residents sought clarification with regard to the Construction Management Plan with regard to the wind category utilised and whether additional dust management measures are needed.
169. The BRANZ mapping referred to by a number of the Jacks Point residents is for the purposes of structural building design and only identifies two small locations on the Homestead Bay site that are considered to be extra high wind zones, being the two highest points. The majority of the site is considered to be in a high wind zone with some areas very high, which is the same as the neighbouring Jacks Point and Hanley's Farm developments. This does not change the proposed mitigation measures in section 5.1.3 of the draft EMP to ensure that dust does not leave the site during construction, this includes an extensive list of mitigation measures that can be implemented. Consent conditions will also be enforceable by ORC and QLDC to ensure dust does not leave site.
170. The ORC submission states that additional conditions are recommended as a result of the scale and duration of the works to ensure that the site does not become a significant source of dust that could be transported beyond the site boundary. These conditions impose a requirement to stop earthworks if the wind speed is higher than 14m per second and a requirement to install

an anemometer on the site to measure wind speed. These recommendations are accepted by the Applicant.

Natural Hazards

171. The QLDC's submission identified that there had been no liquefaction assessment provided for Lot 12 which is to be utilised for the location of infrastructure. This reporting is attached as **Appendix H** which concludes as follows for the location of the proposed infrastructure:

"The results in the above table generally show the liquefaction risk to be similar to eastern areas of the wider Homestead Bay site to the south, and development is therefore considered feasible. Specific engineering design is likely to be required however as the predicted settlements are relatively low, even for large high return period events, engineering and construction options are expected to be available."

And

"The risk of liquefaction occurring in dense glacial till is considered very low to negligible and Geosolve expect no liquefaction consideration will be required for the reservoir structures."

172. The QLDC submission also states that liquefaction investigations for Lot 8 have been confined to only the eastern terrace where perched groundwater is present. This is incorrect. As detailed in Section 6.2.5 of their report (Appendix B – Engineering Feasibility Report – Part 2), Geosolve identified shallow groundwater in eastern areas of the site **only** and the other areas of Lot 8 had groundwater at depth. A detailed liquefaction assessment was therefore only completed for the eastern areas of the site as this is where the potential risk was identified.

Community Housing

173. The Queenstown Lakes Community Housing Trust (**QLCHT**) and the QLDC have both submitted seeking that a 5% affordable housing contribution be

provided in stages. The Applicant has met with the QLCHT and has offered to reach an agreement to provide this 5% contribution. The proposal is to deliver 5% of houses under the sub-market rental model used by RCL at Hanley's Farm in partnership with the QLCHT and this is suggested as an option by the QLCHT in their submission, with legal mechanisms to secure the status of the housing agreed between RCL and the Trust.

174. As there is not an effects or policy basis that would compel RCL to do this, this should be seen as a benefit of the proposal. The Applicant will work on Augier conditions to give effect to this.

Health, Education, Emergency and Postal Services

175. A number of submitters raised concerns about the capacity of the existing health, education, emergency and postal services in the area to cope with additional population demands. These factors are outside of the control of the Applicant to resolve.
176. A number of Jacks Point residents consider that the existing airstrip on Lot 8 has a civil defence function that it should remain. The Queenstown Lakes Spatial Plan and the TTSC have identified Lot 8 as being the location for future urban development including low, medium and high density housing. This is not compatible with the continued operation of an airport activity due to noise and reverse sensitivity effects once residential development standards to be developed closer to the activity.
177. Of relevance to the airport use, the Ministry of Education has requested that the proposed conditions of consent be amended to allow s224c to be issues for lots located within the airport noise contours where the land is to be used for non-residential purposes (including education) to ensure that education activities will not be unnecessarily delayed by the timing of the disestablishment of the NZone activity. Proposed consent condition 47(o) already does not preclude the issue of s224c for land within the 55 dB Ldn contours of the airstrip and therefore this is already provided for.

178. The Ministry of Education also seek amendment to the staging boundaries shown on the proposed subdivision plan to allow for flexibility to obtain s224c for the school sites earlier or in one stage etc. The staging shown on the proposed plans submitted with the application are labelled as indicative only and this flexibility is already provided for.
179. The application of consent notices relating to the residential lots is also of issue to the Ministry of Education and they seek an amendment to proposed Condition 51 for these not to apply to school sites or for a process to be specified in relation to the removal of the consent notice. It is likely that if the Ministry of Education does seek to establish a school that this will require a variation to the subdivision plan to create the school site (and a Notice of Requirement), which is not anticipated to be complex to prepare or process. The variation can also address that there is no need for the residential consent notice to apply to the school lot.

Cumulative Effects

180. The ORC's written comment stated that the following cumulative effects require assessment:
- *This development is of significant scale, representing approximately 27% of the 9,350 total units projected to be built in the Southern Corridor by 2053*
 - *This development is one of several large-scale developments in the Southern Corridor, and no consideration has been given to the potential cumulative effect on water quality and aquatic ecology of these multiple significant land use changes*
 - *The construction-phase activities will occur over an extended duration*
 - *Future landowners are likely to commence earthwork activities on individual lots concurrently with the bulk earthworks undertaken by the Applicant*

- *Poor management of stormwater from the partially developed and fully developed site could have substantial adverse impacts on water quality in onsite streams and Lake Wakatipu, but these discharges are permitted by the RPW.*

181. Relating to the first two points above, it is noted that the proposed development is of significant scale and this enables the regional scale positive benefits as detailed in the AEE, including the increase in housing supply as well as the forecast economic benefits. In terms of potential adverse cumulative effects of the proposal, these are considered to have been well canvassed in the Fast Track application already. Cumulative transport effects have been well identified in Appendix GG and the landscape cumulative effects have been assessed in Appendix FF. The potential cumulative effects upon water quality and aquatic ecology have been assessed in detail in the Engineering Feasibility Report (Appendix B), the Wastewater Assessment of Effects (Appendix HH) and the Water Quality and Aquatic Ecology Effects assessment (Appendix PP). Furthermore, as detailed above, the cumulative effects of the proposed loss of the wetland areas on the site are sought to be compensated for to enable the enhancement of the ecological values within the District.

182. The extended duration of the construction phase activities has been taken into account in the preparation of the CMP and EMP and an Adaptive Management Plan has also been prepared. These will all be 'live' documents which will be updated following monitoring. The Adaptive Management Plan in particular is useful for large, longer-term developments as it involves a continuous loop of monitoring to evaluate the effectiveness of actions and to identify any unexpected impacts and this reduces uncertainty. It is therefore considered that the potential cumulative effects resulting from the extended duration of the project can be suitably mitigated.

183. The point that future lot owners may be developing their individual sites at the same time as additional subdivision stages are being undertaken by the Applicant is something that the Applicant has current experience with at Hanley's Farm. Responsible environmental controls on development sites of

all scale are necessary but these are not taken as seriously for small scale lots in the Applicant's experience. RCL has found that enforcement is largely out of its control once the lots have been created and the roading and infrastructure has been vested in QLDC, being responsibility of QLDC and ORC. In the case of Hanley's Farm the Applicant has concentrated on what it can control being the avoidance or mitigation of effects from the subdivision works and it would appear that Councils have the key roles in ensuring that cumulative effects arising from poor management of the smaller sites do not emerge through educating and enforcing the Regional and District Plan provisions. Notwithstanding, it is acknowledged that if the Homestead Bay infrastructure is not vested in the QLDC that the Applicant and the future Incorporated Society will have a greater role to play in this education and enforcement.

184. The last point above appears to be more a concern about the level of discharges permitted by the Regional Water Plan rather than the cumulative effects of discharges. Notwithstanding, the potential cumulative effects on water quality and aquatic ecology which relate to stormwater discharges however are addressed within the LWP memo in Appendix PP. Furthermore, conditions of consent for the monitoring of heavy metals as a result of stormwater discharges have been incorporated into the wastewater monitoring regime at the request of the ORC's peer reviewer. This goes beyond the requirements of the Regional Water Plan.

Conclusion

185. The time taken by all parties to submit the written comments received on the proposal are appreciated and minor amendments or updates are proposed in response to these comments as outlined above. The outstanding updates to the application outlined above, which the Panel may wish to request as further information from the Applicant are:

- An amended subdivision plan (Appendix M) addressing the changes made in response to the Ōraka discussions and to amend the purpose of Reserve Lot 9002.

- An updated Wetland Management Plan (Appendix QQ) addressing compensation, monitoring of wetland hydrology and interventions if required.
- An updated set of proposed conditions (Appendix T).

186. Many of the written comments have sought a reduction in the size or areas of the development, additional transportation upgrades, provision of community housing, or investment in three waters upgrades with uncertain timeframes and the like. All of these requests cannot be looked at in isolation from each other as the viability of the project is also a necessary consideration.

187. Taking all of the above into account, RCL are confident that the development as proposed meets the purpose of the FTAA. The substantial regional benefits of the proposal are substantially greater than the potential adverse environmental impacts as these are able to be suitably avoided, mitigated or compensated for.

Amanda Leith

Remarkable Planning Limited

4 November 2025