

*under:* the Fast-track Approvals Act 2024

*in the matter of:* an application by RCL Homestead Bay Limited for  
replacement resource consents in relation to the  
Homestead Bay project

Memorandum of counsel on behalf of Te Rūnanga o Moeraki, Kāti  
Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui  
Rūnanga, Waihōpai Rūnanga, Te Rūnanga o Awarua and Te  
Rūnanga o Ōraka-Aparima in response to minute of the panel  
convenor

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Dated: 22 August 2025

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**MEMORANDUM OF COUNSEL ON BEHALF OF TE RŪNANGA O MOERAKI, KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNANGA O ŌTĀKOU, HOKONUI RŪNANGA, WAIHŌPAI RŪNANGA, TE RŪNANGA O AWARUA AND TE RŪNANGA O ŌRAKA-APARIMA IN RESPONSE TO MINUTE OF THE PANEL CONVENOR**

May it please the Convenor

- 1 This memorandum of counsel is filed on behalf of Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, Waihōpai Rūnanga, Te Rūnanga o Awarua and Te Rūnanga o Ōraka-Aparima (collectively, *Kā Rūnaka*) in response to the minute of the Panel Convenor.
- 2 The memorandum previously provided by Kā Rūnaka provided a large amount of detail on the background to and wider interest in the proposal.
- 3 The purpose of this memorandum is to confirm the matters of interest to Kā Rūnaka. These are consistent with paragraph 29 of the memorandum previously provided, but have been grouped to align better with the issues raised by the other participants:
  - 3.1 cultural landscape
  - 3.2 freshwater quality including discharges from wastewater and stormwater;
  - 3.3 Ecology (including the connection with cultural values and effects) with a focus on:
    - (a) wetlands and awa including ephemeral watercourses;
    - (b) indigenous vegetation;
    - (c) indigenous species effects, including, but not limited to, lizards.
  - 3.4 contamination risks due to the presence of contaminated land;
  - 3.5 social and economic effects on mana whenua; and
  - 3.6 consent duration and review conditions.

- 4 Kā Rūnaka will seek to refine (or expand) on these issues if progress is made with discussions with the applicant.

Dated: 22 August 2025



Ben Williams / Rachel Robilliard  
Counsel for Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, Waihōpai Rūnanga, Te Rūnanga o Awarua and Te Rūnanga o Ōraka-Aparima