

**Under the** Fast-track Approvals Act 2024 (**FTAA**)  
**In the matter** of the application by RCL Homestead Bay Limited in relation to Homestead Bay

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**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT COUNCIL  
RESPONDING TO MINUTE 5 OF THE PANEL CONVENER**

**20 August 2025**

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**May it please the Convener:**

**1. INTRODUCTION**

**1.1** This memorandum is provided on behalf of Queenstown Lakes District Council (**QLDC**) in response to Minute 5 of the Panel Convener (**Minute**) regarding the Homestead Bay application (**Application**).

**1.2** The Convener has directed the statutory participants to confirm issues that arise in relation to the Application by 20 August 2025.

**1.3** There was some discussion of peer reviews at the Panel Convenors Conference. QLDC confirms that it has received the following from Otago Regional Council (**ORC**):

- (a) Transport feedback; and
- (b) SLR Consulting peer reviews on the following matters:
  - (i) Wastewater Discharge;
  - (ii) Stormwater;
  - (iii) Contaminated Land;
  - (iv) Earthworks;
  - (v) Flooding;
  - (vi) Air Quality; and
  - (vii) Aquatic Wetland.

**1.4** Council's position on peer reviews will be provided on 27 August, as directed in the Minute.

**2. CONFIRMATION OF ISSUES**

**2.1** For QLDC, the principal issues in contention are confirmed to be:

- (a) Alignment with the Te Tapuae Southern Corridor – Draft Structure Plan;

- (b) Whether the proposed wastewater and potable water infrastructure (and associated land) required to service the development be part of a wider solution for the Te Tapuae Southern Corridor and be vested in QLDC (a “piped” solution), or alternatively to be held privately by, and operated and maintained by an Incorporated Society or equivalent (an “onsite” solution).

**2.2** QLDC also intends to comment on issues that arise in relation to:<sup>1</sup>

- (a) Natural Hazards;
- (b) Stormwater;
- (c) Transport;
- (d) Subdivision Design and Staging;
- (e) Ecology;
- (f) Affordable housing;
- (g) Public Reserves.

**2.3** Affordable housing is a new issue that was not listed in Council’s memorandum dated 11 August. QLDC indicated in its memorandum dated 11 August that it did not intend to address public reserves in written comments. While it does not expect that to be a major issue, it is something that QLDC may well comment on.

**2.4** As advised at the Panel Convenors Conference, and with the exception of public reserves which is now to be commented on, QLDC does not intend to address the following issues in written comments:<sup>2</sup>

- (a) Urban Design;

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1 At the Panel Convenors Conference, counsel for QLDC advised the Panel Convenor that QLDC did not intend to comment on the matters set out in paragraph 3.29 of its Memorandum dated 11 August (the matters listed in that paragraph are Urban Design, Historic Heritage, Noise/Acoustics and Public Reserves). Counsel was not intending to suggest that QLDC did not intend to comment on the matters set out in paragraphs 3.9 – 3.28 of the Memorandum.

2 Refer paragraph 3.29 of QLDC’s Memorandum dated 11 August 2025.

- (b) Historic Heritage;
- (c) Noise/Acoustics.

**Date:** 20 August 2025

A handwritten signature in black ink, appearing to read 'S J Scott', positioned above a horizontal line.

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S J Scott

Counsel for Queenstown Lakes District Council