

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

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

27 August 2025



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May it please the Convener:

INTRODUCTION

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**).
2. The Convener has directed QLDC:
 - 2.1 to identify any areas not addressed in peer reviews provided by the applicant or ORC;
 - 2.2 to advise of its resolution whether to seek expert opinion prior to or upon the invitation by the panel to comment pursuant to s 53; and
 - 2.3 if QLDC resolves to engage expert opinion following the invitation to comment, it will say whether the timeframe should allow for its expert's reports to be provided to the panel pursuant to 67.
3. QLDC has reviewed the peer reviews / comments provided to it by RCL and the Otago Regional Council (**ORC**). Based on the information before it, it does not consider any further peer reviews are required and it does not intend to seek any additional expert opinion beyond internal advice, in the consideration of the RCL application. Therefore no additional timeframe is considered necessary to allow for QLDC to obtain expert reports.

4. Through reviewing the peer review reports provided by RCL and ORC, QLDC has identified some additional information / evidential gaps. These are set out in the attached table, to assist RCL before it provides its updated proposal.

Date: 27 August 2025

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

S J Scott

Counsel for Queenstown Lakes District Council

Clarification / Information sought from the Applicant	Reports / peer reviews referred to
<p>Wastewater – technical issues</p> <p>1. The application information does not clearly define the location of the Land Treatment Area (LTA) and any necessary reserve area required for disposal of treated effluent to ground within Lot 12 DP 364700. This is required to provide a definitive assessment on the feasibility of discharging treated effluent to ground within this lot.</p> <ul style="list-style-type: none"> Clarification sought, no peer review anticipated. <p>2. SLR Consulting State: <i>‘Given that there will be 30ha of wastewater disposal area overlying parts of the groundwater capture zone, I would strongly recommend a greater understanding of the connection between land surface recharge and the groundwater table is sought.’</i></p> <ul style="list-style-type: none"> Suitable evidence to address this recommendation in the SLR report is considered necessary. No peer review is anticipated. 	<p>RCL Application Appendix HH – Lowe Environmental Impact</p> <p>RCL Peer review - Reeftide Peer review (<i>Engineering Feasibility - Appendix D</i>)</p> <p>ORC – SLR Consulting (wastewater discharge)</p>
<p>Potable water – technical issues</p> <p>3. The application water demand calculations do not comply with the QLDC Land Development and Subdivision Code of Practice minimum standards which requires 2100L/day/dwelling for both irrigation and potable water.</p> <ul style="list-style-type: none"> Clarification / update sought from Applicant. No peer review anticipated. 	<p>RCL Application Appendix B: Engineering Feasibility Report <i>Appendix A and B</i> Mott Macdonald Water Modelling & KSL Groundwater Exploration & Effects of Taking Groundwater</p>

Clarification / Information sought from the Applicant	Reports / peer reviews referred to
<p>4. QLDC Land Development and Subdivision Code of Practice requires all reserves to be provided with suitably sized potable and irrigation water supplies.</p> <ul style="list-style-type: none"> Applicant requested to confirm if this has been taken into account by applicant. No peer review anticipated. <p>5. RCL state they have been doing regular water quality sampling of the bore that show lower levels of arsenic. However QLDC has not seen the results of this testing. It is requested that these are provided.</p> <ul style="list-style-type: none"> QLDC requests that these results are provided. No peer review anticipated. 	<p>ORC - SLR</p>
<p>Natural Hazards</p> <p>6. It is unclear if the liquefaction assessment considers Lot 12. No CPT data was provided where water reservoir / WWTP are located.</p> <ul style="list-style-type: none"> QLDC seek clarification on whether a liquefaction assessment for the areas of Lot 12 where infrastructure is proposed. No peer review anticipated. <p>7. Earthwork plans do not illustrate in relation to the roundabout diversion channel on the eastern side of the SH6 roundabout and within gully sides and floors to construct rock aprons and check dams.</p> <ul style="list-style-type: none"> QLDC seek clarification / updated plans if necessary. No peer review anticipated. 	<p>RCL Geosolve Natural Hazard Assessment and Geotechnical Assessment Appendix B Engineering Feasibility Report – <i>Appendix D & G</i> –</p> <p>RCL Peer reviews: Fluent solutions & WSP (<i>Engineering Feasibility – Appendix H&I</i>)</p>

Clarification / Information sought from the Applicant	Reports / peer reviews referred to
<p>8. The eastern diversion channel appears to be located on land which is outside the subject site. The eastern channel also appears to drain back into the northern diversion channel and will require a large culvert structure under the State Highway, outside of application site.</p> <ul style="list-style-type: none"> QLDC seeks clarification / updated plans if necessary. No peer review anticipated. 	
<p>Stormwater</p> <p>9. Towards the northern part of the western boundary outlets 1-7 drain discharge into neighbouring properties.</p> <ul style="list-style-type: none"> QLDC seeks clarification that downstream capacity assessments are undertaken for these outlets to confirm that sufficient capacity exists to accommodate for these post development flows in accordance with the QLDC Land Development and Subdivision Code of Practice. No peer review anticipated. 	<p>RCL – Stantec Engineer Feasibility Report</p>
<p>Transport</p> <p>10. The WSP transport analysis submitted with the application underestimates population growth figures for the Southern Corridor when comparing against more recent population growth figures within the Te Tepuae Southern Corridor Structure Plan that indicates a population of 9350 dwellings by 2055. Subsequently vehicle trip modelling is likely underestimated and transport provisions understated.</p> <ul style="list-style-type: none"> QLDC requests the assessment is updated to consider the more recent population growth figures to confirm mitigations proposed remains suitable. No peer review is anticipated. 	<p>RCL: Stantec Integrated Transport Assessment Appendix V and WSP Transportation Analysis Appendix GG</p> <p>ORC have shared feedback on transport matters with QLDC.</p>

Clarification / Information sought from the Applicant	Reports / peer reviews referred to
<p>11. Legal road reserves in orange super-lot zones range from 15m to 17m. That legal width is appropriate for low density residential primary access only, but not for commercial lots given the increased heavy goods vehicles (HGVs) manoeuvres required to service the lots. This should be resolved and widened. Further, localised widening will likely need to be incorporated into the designs to cater for larger bus fleets which ORC have indicated could service the area as early as 2030.</p> <ul style="list-style-type: none"> • QLDC requests further assessment in regard to this or plans updated to address these concerns. No peer review anticipated. 	