

FTAA-2506-1071

16 February 2026

Jayne Macdonald
Homestead Bay Expert Panel Chair

Dear Jayne,

Response to Homestead Bay Expert Panel Minutes 10 – National Direction

This memorandum is in response to the Homestead Bay Panel Minute 10 seeking assessment of the proposal against the new/amended national direction instruments which came into effect on 15 January 2026. These are addressed below.

Resource Management (National Environmental Standards for Detached Minor Residential Units) Regulations 2025

This new National Environmental Standard (NES) introduces new standards for detached minor residential units subject to compliance with specific standards. This NES will apply to the lots created by the subdivision which are located within the Rural zoned area of the site (and if later zoned Residential) and will allow for the construction of a minor residential unit in addition to the primary residential unit.

The NES is not introducing any additional permitted development that has not already been considered and assessed as part of the substantive application. This is due to the Queenstown Lakes Proposed District Plan (PDP) already permitting the construction of one residential flat per residential unit across the District and this is the equivalent of the detached minor residential unit in the NES.

National Policy Statement for Natural Hazards 2025

The objective of this new National Policy Statement (NPS) is for the natural hazard risk to people and property associated with subdivision, use and development to be managed using a risk-based proportionate approach.

The substantive application for Homestead Bay included a Natural Hazard Assessment (**Appendix B**) assessing the alluvial fan flooding and debris flow risks, rock fall, debris avalanche and lake seiche hazards. This report included an assessment of the risks to people and property as a result of these hazards and utilised a risk-based proportionate approach as required by the above NPS objective.

The Geosolve alluvial fan and debris flow risks were also peer reviewed by Fluent and WSP respectively with the feedback incorporated into the final report in **Appendix B** and the report was peer reviewed by SLR on behalf of the Otago Regional Council assessment of the application.

The NPS has six policies which are listed and assessed below with regard to the proposal.

Policy 1: When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.

The Geosolve report was prepared using the risk matrix methodology in APP6 – *Methodology for natural hazard risk assessment* in the Otago Regional Policy Statement (RPS). This risk table is very similar to the one now included in the NPS as shown below. The main difference between the matrices being the inclusion of two additional 'likelihood levels' in the NPS – very likely and very rare.

Table 8: Risk table

Likelihood	Consequences				
	Insignificant	Minor	Moderate	Major	Catastrophic
Almost certain					
Likely					
Possible					
Unlikely					
Rare					
Green, Acceptable Risk: Yellow, Tolerable Risk: Red, Significant Risk					

Table 1: APP6 risk matrix

Figure 1: Risk matrix

		Likelihood Level						
		Almost Certain	Very Likely	Likely	Possible	Unlikely	Rare	Very Rare
ARI (years)		up to 10	10-20	20-50	50-100	100-500	500-5000	> 5000
AEP		10% or more	10% to 5%	5% to 2%	2% to 1%	1% to 0.2%	0.2% to 0.02%	< 0.02%
Consequence Level	Catastrophic	Very High	Very High	Very High	High	Medium	Medium	Medium
	Major	Very High	Very High	High	High	Medium	Medium	Medium
	Moderate	High	High	High	Medium	Medium	Low	Low
	Minor	Medium	Medium	Medium	Medium	Low	Low	Low
	Negligible	Low	Low	Low	Low	Low	Low	Low

Table 2: NPS risk matrix

Geosolve have prepared the attached letter explaining the natural hazard risks of the project against the NPS risk matrix in comparison to the assessments undertaken under APP6. The risk is still assessed as low providing the proposed mitigations are implemented. Consequently, the NPS does not change the Geosolve conclusions on the project.

Policy 2: Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.

The Geosolve assessment has taken this approach into account in their reporting through utilising the APP6 assessment criteria that takes both the likelihood and the consequence into account.

Policy 3: Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.

None of the natural hazard risks assessed by Geosolve were identified as having a very high natural hazard risk.

Policy 4: Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.

The proposed development will not create or increase significant natural hazard risks on other sites as detailed in the Geosolve assessment.

Policy 5: Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.

Geosolve's assessment incorporated a number of site inspections, analysis of historical information as well as comprehensive modelling of the hazards and has undertaken a conservative approach throughout. Multiple peer reviews have also been undertaken as detailed above to confirm the acceptability of the assessment and findings.

Policy 6: The potential impacts of climate change to at least 100 years into the future must be considered.

As detailed in Geosolve's report, the conservative RCP8.5 (2081-2100) climate change scenario has been utilised in their modelling and assessment and is incorporated into their risk assessment.

Overall, the Geosolve Natural Hazard Assessment report provided within the substantive application is considered to meet the natural hazard assessment requirements under the NPS and the proposed development is consistent with the objective and policies of this NPS in that the natural hazard risk to people and property is able to be managed in a proportionate way.

National Policy Statement for Highly Productive Land Amendment 2025

The changes to this NPS that came into effect on 15 January 2026 are with regard to quarrying activities. These amendments are not of relevance to the assessment of the proposal.

This NPS was addressed in **Appendix LL** of the substantive application as follows:

"The Rural zoned portion of the subject site is identified by the Manaaki Whenua / Landcare Research GIS mapping as having a highly productive land rating of LUC-Class 3. However, as the Queenstown Lakes Spatial Plan 2021 identifies the subject land for future urban development, the NPS does not apply to this area of the site. Furthermore, the remainder of the site is zoned Jacks

Point Zone and the NPS also does not apply to this part of the application site. Consequently, the NPS is not applicable to the assessment of the proposal.”

The above assessment is still considered valid. Mapping of highly productive land has not yet been completed by the ORC and consequently Section 3.5(7) of the NPS is relevant. This states:

7 Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that:

- a) is:*
 - i. zoned general rural or rural production at the commencement date; and*
 - ii. LUC 1, 2 or 3; but*
- b) is not:*
 - i. identified for future urban development at the commencement date; or*
 - ii. subject to a council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle at the commencement date; or*
 - iii. subject to a resource consent application for subdivision, use or development on LUC 3 land for any activity other than rural lifestyle, where that consent has been lodged at or after the commencement date.*

And the definition of ‘identified for future urban development’ from the NPS is detailed below:

identified for future urban development means:

- a) identified in a published Future Development Strategy as land suitable for commencing urban development over the next 10 years; or*
- b) identified:*
 - i. in a strategic planning document as an area suitable for commencing urban development over the next 10 years; and*
 - ii. at a level of detail that makes the boundaries of the area identifiable in practice*

The subject site was identified in the Queenstown Lakes Spatial Plan 2021 as land for future urban development. Furthermore, the QLDC adopted the Te Tapuae Southern Corridor Structure Plan in 2025 also showing the subject site as being suitable for urban development generally consistent with the Homestead Bay proposal. Consequently, the NPS doesn’t apply to the land under Section 3.5(7)(b)(i).

Furthermore, the subject site is identified by the Manaaki Whenua / Landcare Research mapping as LUC 3 and consequently, the exception in Section 3.5(7)(b)(iii) also applies to the substantive application.

New Zealand Coastal Policy Statement Amendment 2025

Not applicable.

National Policy Statement for Indigenous Biodiversity Amendment 2025

The changes to this NPS that came into effect on 15 January 2026 are with regard to quarrying activities. These amendments are not of relevance to the assessment of the proposal.

An assessment of this NPS was provided in **Appendix LL** of the substantive application. Since this time, amendments to the application have been made to strengthen the ecological benefits of the proposal and to mitigate the potential adverse effects on indigenous biodiversity. The proposal is therefore still considered to be consistent with the requirements of the NPS.

National Policy Statement for Freshwater Management Amendment 2025

The changes to this NPS that came into effect on 15 January 2026 are related to quarrying activities. These amendments are not of relevance to the assessment of the proposal. Consequently, the NPS assessment provided in **Appendix LL** of the substantive application is still considered relevant, taking into account the amendments to the application that have been made during the processing of the application to further mitigate the potential adverse effects upon freshwater values.

Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025

The changes to this NES that came into effect on 15 January 2026 relate to quarrying activities. These amendments are not of relevance to the assessment of the proposal. As detailed in the substantive application, consents are required under this NES for the proposal.

National Policy Statement for Infrastructure 2025

This new NPS has been developed to provide national direction to support the development, maintenance and upgrade of infrastructure across New Zealand and applies to the operation, maintenance, renewal and upgrade of existing infrastructure as well as the development of new infrastructure. This NPS is of relevance to the assessment of the proposal given that new infrastructure is proposed to service the development.

The objective of the NPS is as follows:

1. The objective of this National Policy Statement is to:

- a) ensure the national, regional and local benefits of infrastructure are provided for;*
- b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;*
- c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;*
- d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and*
- e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.*

The NPS also includes a number of policies against which the proposal is assessed below.

Policy 1: Providing for the benefits of infrastructure

The local and regional benefits of the proposed infrastructure are well covered in the substantive application in terms of providing social, cultural and economic well-being and benefits associated with housing supply for present and future generations and the creation of a well-functioning urban environment as part of the wider Southern Corridor settlement, also including land for future commercial development.

The localised adverse effects of the proposed infrastructure are also well covered in the application, including from the water supply, wastewater disposal, stormwater management, telecommunications and power and transportation. As detailed in the substantive application, all of these potential adverse effects are able to be suitably avoided, remedied or mitigated. Conditions of consent have been proposed to manage these effects and to ensure that the infrastructure is developed, operated and maintained so not to become compromised in the future.

As detailed in the proposed conditions of consent, options for connection of the wastewater disposal and water supply to the Council network or for a fully private scheme are allowed for.

Policy 2: Operational need or functional need of infrastructure to be in particular locations and environments

The operational and functional needs of the infrastructure servicing strategy have been taken into account in the design of the proposed development. This includes locational requirements such as the height of the proposed reservoir tanks, the proposed earthworks to allow for stormwater drainage, management of flood waters from the upper catchment around the site and the like.

Policy 3: Consider spatial planning

The Queenstown Lakes Spatial Plan 2021 did not include details of servicing requirements for the subject site and surrounds. However, the Te Tapuae Southern Corridor Structure Plan adopted in September 2025 incorporates a preferred servicing strategy for the corridor. The processing of the fast track consent has considered these spatial planning documents. This Structure Plan proposes connection of the subject site to the QLDC's reticulated water supply and wastewater networks. Consequently, the proposed conditions of consent have been amended to allow for connection to the Council network or for development of an independent scheme, should QLDC be in a position to allow this to occur.

Policy 4: Enabling the efficient and timely operation and delivery of infrastructure activities

Achievement of this policy is embedded within the proposed conditions of consent allowing for flexibility in the choice of wastewater treatment and allowing for ongoing monitoring of water usage and wastewater flows and the like, to make effective use of infrastructure and to allow for continuous improvement in service delivery and environmental outcomes over time.

Policy 5: Recognising and providing for infrastructure supporting activities

As all of the facets of the development including the construction and installation of the supporting infrastructure are being considered as part of the substantive application, this policy is not considered to be of relevance.

Policy 6: Recognising and providing for Māori interests

The Applicant has a process agreement with Kā Rūnaka which has facilitated engagement through the assessment of the Fast Track application process. The Applicant and Kā Rūnaka representatives are having regular discussions with regard to the proposal and further opportunities for engagement and collaboration.

Policy 7: Assessing and managing the effects of proposed infrastructure activities

This policy includes a requirement for decision makers to have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the site, route or method of work, to consider the operational and technical requirements and constraints of the infrastructure and to take into account relevant international standards, national standards and recognised best practice to assess and manage effects. The assessment of the effects of the proposed infrastructure within the substantive application has taken these matters into account and the potential effects will be suitably managed.

Policy 8: Operation, maintenance and minor upgrade of existing infrastructure

This policy isn't considered to be of relevance to the proposal.

Policy 9: Managing the effects of new infrastructure and major upgrades

There are no RMA Section 6 matters of national importance of relevance to the assessment of the proposed infrastructure within the site and the potential adverse effects of the new infrastructure will be avoided, remedied or mitigated as detailed in the substantive application.

Policy 10: Planning for and managing the interface and compatibility of infrastructure with other activities

These policies relate to the drafting of planning instruments and are therefore not applicable.

Policy 11: Assessing and managing the interface between infrastructure and other activities

This policy is of relevance to the assessment of the proposal and many parts have been the subject of submissions received (and responded to) including noise, dust and visual effects. Other amenity effects including odour and lake water quality have also been the subject of peer review and expert conferencing. The proposed conditions of consent have been developed to manage these effects at the interface with the existing adjacent residential properties and ongoing monitoring is proposed for some matters.

Overall, the proposal (including the conditions of consent that are proposed) will ensure that the proposal is consistent with the objective and policies of this NPS.

National Policy Statement for Renewable Electricity Generation Amendment 2025

Not applicable.

National Policy Statement for Electricity Networks Amendment 2025.

Not applicable.

Please advise if you require any clarification on the above.



Amanda Leith
Remarkable Planning Ltd

GeoSolve Ref: 220556.01
Feb 16th 2026

RCL Homestead Bay Limited
Suite 201 3-5
Claremont St
South Yarra 3141 Australia

Attention: David Finney, Dan Wells

NPS Risk Assessment Homestead Bay, Queenstown

Dear David/Dan,

In accordance with the requested extension to our original Agreement dated 9th October 2024, we have undertaken a review of our risk assessment to ensure it complies with the National Policy Statement (NPS) for Natural Hazards 2025. The NPS requires the following natural hazards to be assessed:

- Flooding;
- Landslips;
- Coastal Erosion;
- Coastal Inundation;
- Active Faults;
- Liquefaction and;
- Tsunami

Geosolve reporting was completed early 2025 and included a qualitative risk assessment in accordance with the Queenstown Lakes District Council District Plan & Otago Regional Council Regional Policy Statement (RPS) 2021, and quantitative assessment where considered relevant. Reporting included a detailed assessment of natural hazards which considered the potential impacts of climate change.

Landslip risk, including debris flow, rockfall, debris avalanche, and Tsunami risk (Noted by Geosolve as a Lake Seiche hazard) are assessed in our reporting as “acceptable” without mitigation as per the methodology given in APP6 of the Otago RPS. Applying the methodology from Appendix 1 of the NPS results in a low risk for the above natural hazards.

The risk for debris flooding was assessed in our reporting as “tolerable” without mitigation and “acceptable” with the proposed mitigation as per the methodology given in APP6 of the Otago RPS. Applying the methodology from Appendix 1 of the NPS results in medium risk without mitigation and low risk with the proposed mitigation for debris flooding. In addition, the proposed mitigation are not considered to increase the downstream flooding hazard as discussed in our reporting.

The potential for liquefaction have been identified in some areas. The magnitude of ground deformation is assessed by Geosolve to be such that mitigation by standard engineering design is achievable to meet building code requirements. Applying the methodology from Appendix 1 of the NPS results in a low risk.

Active faults have been assessed by Geosolve. No known active faults are present at the site or in the immediate area, with the nearest being the NW Cardrona Fault 15 km to the north east with a calculated ARI (likelihood) of 5,500 years. Applying the methodology from Appendix 1 of the NPS results in a low risk with respect to active faulting.

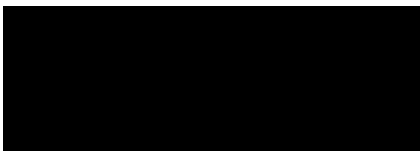
Coastal hazards are not considered applicable at the site.

As such, the existing reporting and natural hazard risk assessments are considered to meet the requirements of the NPS for Natural Hazards, resulting in a low natural hazard risk for the proposed development provided the proposed mitigations are implemented.

Applicability

This report has been prepared for the sole use of our client, RCL Homestead Bay Limited, with respect to the particular brief and on the terms and conditions agreed with our client. It may not be used or relied on (in whole or part) by anyone else, or for any other purpose or in any other contexts, without our prior review and written agreement.

Yours faithfully,



Henry Wadworth-Watts

Water Resources Engineer

GeoSolve Limited