

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.

UPDATES TO HOMESTEAD BAY FAST TRACK APPLICATION

RCL HOMESTEAD BAY LIMITED

19 SEPTEMBER 2025



INTRODUCTION

This memorandum is filed on behalf of RCL Homestead Bay Limited (**RCL**) to advise the Fast Track Panel of the updates to the application documents.

RCL has undertaken the further consultation process that was volunteered by RCL to the Panel Convenor on 27 August 2025 to further narrow the initial issues that had been identified by the statutory participants (Otago Regional Council (**ORC**), Queenstown Lakes District Council (**QLDC**), Department of Conservation (**DoC**) and iwi representatives).

RCL has also met with representatives of the neighbouring Jacks Point Residents and Owners Association (**JPROA**) with regard to the land disposal proposal for wastewater and had further discussions with Waka Kotahi / New Zealand Transport Agency (**NZTA**) regarding intersection upgrades.

As a result of these discussions, additional information and amendments to the fast track application documents are proposed.

Otago Regional Council

The ORC commissioned a number of peer reviews of the fast track application with the agreement of RCL. These peer reviews were undertaken by SLR and covered the following areas of assessment:

- a. Contaminated land
- b. Aquatic and wetland ecology
- c. Earthworks
- d. Flooding
- e. Air quality
- f. Wastewater discharge and groundwater
- g. Stormwater

The initial SLR peer reviews outlined a number of mostly minor concerns, requested further information in some areas and/or recommended additional or amended conditions of consent.

In response, RCL provided additional information to the ORC, and has now made edits to the application documents as well as changes to the proposed conditions of consent.

Updated peer reviews from SLR were then commissioned by the ORC and these outline that the majority of the issues raised initially have been addressed by the further information received from RCL. The remaining outstanding matters are relatively minor have been addressed through further changes to the proposed conditions of consent.

Both the initial and final SLR peer reviews, as well as the additional information and assessments provided to the ORC in response to the initial SLR peer review comments are incorporated within the list of updated fast track documents below.

Queenstown Lakes District Council

Updated information submitted to the ORC has also been circulated to the QLDC. Some of this updated information also addressed the issues that the QLDC raised in their memorandum to the Panel Convenor dated 27 August 2025.

The remainder of the issues raised in the memorandum have also been addressed via additional information shared with the QLDC (and other statutory participants) on 11 September 2025.

The additional information and assessments provided to the QLDC are incorporated within the list of updated fast track documents.

QLDC have also provided initial comments on the proposed conditions of consent and the majority of these have been adopted.

Department of Conservation

In response to the issues raised by DoC in their memorandum to the Panel Convenor dated 20 August 2025 relating to the Wildlife Approval, an updated Lizard Management Plan has been prepared and sent to DoC. DoC also recommended changes and additional conditions for the Wildlife Approval and these have been adopted.

DoC also raised similar resource consent relating issues to the matters raised by the ORC in its peer review of aquatic and wetland ecology. The additional information and assessments addressing the outstanding issues raised by DoC have been sent to them. DoC have also been included in the discussions relating to the resource consent conditions of consent and some of their recommendations have been incorporated within the updated conditions of consent.

Iwi

All of the updated information and assessments noted above and below have been shared with the iwi representatives for the proposal. The iwi representatives were also extended an invitation to discuss the proposed conditions of consent. Further discussions with iwi representatives have been held with regard to the reporting that is being commissioned to inform the Rūnaka's written comment during the s53 comment period.

Jacks Point Residents and Owners Association

RCL has met with representatives of the Jacks Point Residents and Owners Association primarily with regard to the proposal to dispose treated wastewater to land adjacent to the existing consented wastewater land treatment areas for Jacks Point. No agreement was reached through these discussions; however some modifications have been made to the proposed wastewater discharge conditions of consent with regard to monitoring of ground and surface water effects to address the concerns that were communicated to RCL.

The proposed changes to the monitoring regime result in the proposed Homestead Bay scheme having stricter compliance limits than the existing Jacks Point discharge consent conditions. This would result in any advanced monitoring requirement being triggered for the Homestead Bay proposal before it is triggered for Jacks Point.

New Zealand Transport Agency

A further meeting was held with NZTA in respect of the volunteered state highway intersection upgrades. It was agreed that alternative configurations to roundabouts such as traffic lights should not be discounted at this stage. Changes to the proposed conditions have therefore been made to provide more flexibility in this regard.

Updated documentation

As a result of the abovementioned processes and discussions, the following additional and updated information is provided:

Document	Updated or new?	Comment
Appendix B – Engineering Feasibility Report addendum (Stantec)	Addendum	This addendum incorporates the following further information that has been supplied to the statutory participants: • Responses to the defence against water technical peer review • Responses to stormwater discharges peer review • Responses to wastewater discharge and groundwater peer review including Kowanawa Solutions assessment and LEI memo • Responses to earthworks peer review • Assessment of emerging contaminants • Updated bore water quality testing results • Feasibility of and requirements for connection to QLDC's wastewater reticulation
Appendix C – Wetland Assessment	Updated report	This updated report provides additional details of the wetland assessment for the site. This additional assessment resulted in seven wetlands being identified on the site as opposed to six in the original report.

Appendix R – Proposed wastewater reserves to vest plan	Updated plan	The plan lodged with the fast track application was not the most up to date plan of the reserves that are proposed to be vested.
Appendix T – Proposed conditions of consent	Updated	The proposed conditions have been amended as a result of further assessment and discussions with the statutory participants and neighbours.
Appendix X – Construction management plan	Updated plan	This management plan has been updated as a result of feedback from the ORC.
Appendix Y – Ecological effects assessment	Updated assessment	This assessment has been updated as a result of feedback from the ORC and DoC.
Appendix AA – Lizard management plan	Updated plan	This management plan has been updated as a result of feedback from DoC.
Appendix CC – Groundwater monitoring bore locations plan	Updated plan	This plan has been updated to incorporate additional monitoring bore locations as a result of feedback from ORC and following discussions with the JPROA representatives.
Appendix HH – Wastewater assessment of effects	Updated assessment	Two of the appendices (A and C) of this document were not the final versions. Appendix G has also been updated to respond to feedback from the ORC and JPROA representatives.
Appendix KK – Acoustic memo	Updated report	The incorrect acoustic memo was submitted with the application. This updated report reflects the discussion and figures within the AEE as well as the references within the proposed conditions of consent.
Appendix NN – Detailed site investigation	New	A Preliminary Site Investigation was submitted with the application with a proposed condition that a Detailed Site Investigation be submitted prior to works commencing. This Detailed Site Investigation has now been undertaken for the areas of the site where this is possible.
Appendix OO – Odour impact assessment	New	Whilst the originally submitted engineering assessment concluded that the odour standards of the ORC Air Plan could be met, more detailed modelling was subsequently undertaken to further substantiate this. This report has been prepared to address compliance with the ORC Air Plan standards with regard to air

		discharge from the proposed wastewater treatment plan. This report confirms that compliance can be achieved.
Appendix PP – Water quality and aquatic ecology effects assessment	New	This assessment was provided as a result of feedback received by the ORC. This document summarises the assessments of water quality and ecology provided within a number of documents.
Appendix QQ – Wetland management plan	New	This has been prepared following feedback from ORC and DoC.
Appendix RR – Otago Regional Council peer reviews	New	This document incorporates the initial SLR peer reviews that were commissioned by the ORC. The RCL response and the final peer reviews received.
Updated Assessment of Environmental Effects	Updated (clean version and track change version provided)	Minor changes to the AEE have been made to update or correct the AEE as a result of feedback received from the statutory participants.

The only substantive changes to the fast track application relate to the inclusion of the option for the development to connect to the QLDC reticulated wastewater network as an alternative to land disposal and the identification of an additional wetland.

The option to connect to QLDC's reticulated wastewater network has been included within the proposed consent conditions as a result of QLDC's expressed preference as communicated in discussions and through the QLDC's adoption of the Te Tapuae Southern Corridor Structure Plan. This will be further discussed with QLDC to determine which option is proceeded with. Although described as a substantive change, this would not require any additional consents and if reticulation is utilised then the wastewater discharge approval will be able to be surrendered or not exercised.

The feedback from the ORC led to an area of Lot 12 being further assessed as a potential wetland. The assessment confirmed that this area is a Fog Marsh wetland.

Consequently, there are now seven wetlands identified across the site. Six of these will be destroyed by the proposed works and one is to be protected / enhanced.

No other substantive changes to the application have been made and the updated documents referenced above provide further information, clarifications and improved monitoring.

Conclusion

RCL requests that the fast track application be updated with the above information and the updated application be the subject of the Section 53 written comment period. As these updates are being made prior to the written comment period commencing and only 5 working days since the appointment of the Panel for the project, no participants in the process are considered to be disadvantaged.