

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.

RESPONSE TO REQUEST FOR INFORMATION**RCL HOMESTEAD BAY LIMITED****18 NOVEMBER 2025**



Residential
Community
Living

Introduction

This memorandum is prepared by RCL Homestead Bay Limited (**RCL**) in response to the Cultural Impact Assessment submitted by Kā Rūnaka to the Panel on 11 November 2025.

RCL has reviewed the Cultural Impact Assessment (CIA) and spoken further with Kāi Tahu representatives.

RCL consulted with Aukaha and Te Ao Marama since it purchased Lot 8 as part of its efforts to progress planning proposals for the site, including its Fast Track referral and substantive applications.

A Process Agreement was signed between RCL and Kāi Tahu in April 2025. This has established the framework for ongoing dialogue between the parties with regard to the proposal. RCL's view is that the agreement can be enduring, not limited to the period of the Fast Track consent application. It assists Kā Rūnaka to engage in the Fast Track process through RCL's commitment to meet costs, and has clarified appropriate contacts for communication. RCL envisages engagement with Kāi Tahu beyond the Fast Track process through to the implementation of the development.

RCL notes some concerns set out within the CIA in respect of the project as it stands and responds below (following the headings of Section 5 of the CIA):

Kai Tahu Authority and Partnership

The CIA states that consultation in preparing the application has been procedural and does not currently provide for Kai Tahu partnership in decision-making, governance, or ongoing management of the development.

RCL does have a record of outreach to iwi authorities in relation to this project using methods and channels of communication the company and its consultant team had typically used in other projects (e.g. Hanley's Farm). Account was taken in the project design of early feedback from mana whenua representatives and the project team's general knowledge of areas of interest Kā Rūnaka's, for example in respect of:

- Avoiding wastewater discharges directly to water bodies;
- Accommodating indigenous planting into plans; and
- Creating and improving access to Lake Whakatipu and its tributaries.

However, through this process RCL and its team have learned about Kā Rūnaka's evolving expectations for involvement and partnership in development in Tāhuna.

RCL's Homestead Bay substantive fast track application was lodged relatively shortly after the passing of the Fast Track Approvals Act, and presumably is one of the first which Kā Rūnaka have had to respond to. It is understood that Kā Rūnaka deliberated over how they wished to engage with fast track applications. The Process Agreement was proposed by Kā Rūnaka, and signed by both parties, around a similar time to when the substantive application was lodged. While it is acknowledged that Kā Rūnaka values may not have been foundational to the design of the project up to that point, dialogue has continued around opportunities to incorporate Kai Tahu's values as the project proceeds.

RCL considers that there are some practical limitations to the extent to which a property developer can incorporate mana whenua into the governance and decision making of a development project. Nevertheless, RCL have had conversations with Kai Tahu representatives about aspects of the development processes which it can further engage on. An example is that RCL can continue to liaise with mana whenua as it selects its preferred wastewater treatment technology, to provide confidence that environmental responsibility is at the fore of those decisions.

Other ideas, which have been previously mentioned in application documents, include involving Kā Rūnaka in place naming and reserve design. The partnership agreement will provide an ongoing framework for such engagement and partnership building.

Loss of Mauri and Disruption of Ancestral Relationships

The CIA notes the loss of six natural wetlands. As covered elsewhere in the application and subsequent correspondence from the applicant, RCL considers that it is impractical to retain the smaller and more degraded wetlands within a large urban development of this nature, as each wetland would require associated retention of at least a portion of its overall catchment area also.

It is RCL's hope that the enhancement of the larger wetland (on Lot 9002), combined with funding toward off-site wetland restoration projects in the Wakatipu Basin, exceeding the estimated cost of compensating for this loss, will go some way to mitigating this loss of taoka.

Similarly, while there is native vegetation lost as part of the development (0.9ha), there is proposed to be a substantial net gain in indigenous planting (19.02ha) and associated biodiversity outcomes, which may be a mitigating factor.

The concern as to the disruption to mauri from "treated wastewater, urban stormwater and sedimentation from earthworks into the environment (including a sensitive lake catchment)" is acknowledged. RCL believes that it has employed best practice in its design of these elements of the application and intends to proceed in a similar vein through the implementation phase. The hope is that responsible stewardship will mitigate such cultural effects, with ongoing dialogue and information sharing providing an opportunity to build confidence in RCL's performance on such matters.

While not stated within the CIA, it is understood from parallel communications that provided RCL's scheme operates as intended on site, this is likely to be a preferable outcome compared to connection to the QLDC's current wastewater treatment and disposal scheme at the Shotover Delta. Furthermore, the peer review of the on-site wastewater option procured by Kā Rūnaka and undertaken by Airey Consultants concludes that *"based on the information supplied and the assumption that the system is operated in accordance with the design intent, I am of the opinion [sic] that the long term residue risk to Lake Wakatipu are low."*

Insufficient Protection of Taoka and Cultural Heritage

The CIA states:

"there is limited provision for co-management, delegated authority, or ongoing Kāi Tahu participation in environmental monitoring, reserve management, or infrastructure governance".

While this may not be an explicit part of the application, discussions held in accordance with the Process Agreement are offering ideas on opportunities in these areas. For example, RCL have enquired as to whether Kā Rūnaka (or affiliated

organisations or groups) may be well placed to take an active partnership in the onsite wetland restoration project (including potentially taking ownership of the land). Similarly, RCL is open to discussing Kā Rūnaka involvement in other biodiversity projects on the site.

In respect of interest in environmental monitoring, the Kā Rūnaka representatives have indicated that a useful starting point would be to share the results of the monitoring undertaken and this can evolve and develop further as the project progresses. Kā Rūnaka's interest in environmental monitoring and capturing of data of matters that are of interest to mana whenua are acknowledged and can be supported.

Embedding of Mātauraka Kāi Tahu and Tikaka

RCL's intention is to discuss opportunities with mana whenua to employ these principles and utilise this knowledge as detailed design and project implementation proceeds. As noted above, opportunities with regard to the wetland restoration and biodiversity outcomes on the site continue to be discussed.

Potential Prejudice to Treaty Settlements and Redress

RCL believes it has complied with the Treaty of Waitangi obligations of the Fast Track legislation through establishing that there are not ongoing claims specific to this site and there are no identified wāhi tupuna or archaeological sites of interest to mana whenua within the site.

Furthermore, the development will not restrict access to Lake Whakatipu which is the adjacent statutory acknowledgement area and as detailed above, best practice in its design of the wastewater and stormwater elements of the application has been employed and will be continued through the implementation phase.

Loss of Access to Mahika Kai and Wāhi Tipuna

As the land is currently privately owned with no public access, access will be improved through the implementation of the project and the creation of public places into and through the site, including to Lake Whakatipu.

Inadequate Cultural Interpretation and Public Understanding

Mana whenua's ongoing interest in this matter is noted. Reserve design and place naming in particular would appear to present a opportunities to incorporate such elements into the subdivision. Further engagement as detailed designs develop, in accordance with the Process Agreement, offers a path to making this occur.

Limited Opportunities for Kāi Tahu Social and Economic Participation

Ideas on social and economic participation continue to be discussed between the parties. While RCL does not feel in a position to enter into formal arrangements such as "first right of refusal" for housing, relationships developing via the Process Agreement offer the potential for future opportunities to be considered.

As previously mentioned, other opportunities to promote social and economic participation include ecological restoration partnership. RCL has identified a Māori charitable trust as a strong candidate for the projects to compensate for the wetland loss within the site, and at the time of writing has sought feedback from mana whenua representatives as to this prospect.

Dan Wells

RCL Group

18 November 2025