

Before the Expert Panel

FTAA- 2506-1071

Under Fast-track Approvals Act 2024

In the matter of the application by RCL Homestead Bay Limited in relation to Homestead Bay

Memorandum of Counsel for Jacks Point Group regarding standing of entities to comment and scope of comment

Date: 20 October 2025

Party's solicitors:

Maree Baker-Galloway | Hannah Zydenbos

Anderson Lloyd

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maree.baker-galloway@al.nz | hannah.zydenbos@al.nz

**anderson
lloyd.**

May it please the Expert Panel

- 1 This memorandum is provided on behalf of Jacks Point Village Holdings Limited, Jacks Point Village Holdings No 2 Limited, Jacks Point Land Limited, Jacks Point Golf Land No 1 Limited and Jacks Point Management Limited (**Jacks Point Group**) following on from the memorandum of counsel dated 3 October 2025 regarding Minute 1 of the Expert on the RCL Homestead Bay Limited (**RCL**) application (**the Application**) made under the Fast-track Approvals Act 2024 (**FTAA**).
- 2 The purpose of this Memorandum is to follow up the 3 October request to the Expert Panel that the full Jacks Point Group be invited to Comment, to which no response has been received.
- 3 The Expert Panel Minute 1 directed the EPA to invite, **not later than 29 September 2025**, written comments on the substantive application. Jacks Point Land Limited and Jacks Point Golf Land No 1 Limited were identified to be invited to comment as owners of land adjacent to the application site.
- 4 The invitation to comment was not received in accordance with the Expert Panel's directions on 29 September. The invitation to comment was sent in the post, by way of letter dated 29 September, but not received until **8 October 2025**.
- 5 The EPA had a record of the fact Anderson Lloyd acts for the Jacks Point Group by virtue of the letter to the Fast Track Team dated 22 September 2025, submitted again with the Memorandum to the Expert Panel on 3 October. The EPA was in a position to comply with the direction and invite the Jacks Point group on 29 September by email.
- 6 Jacks Point Group respectfully request that Jacks Point Village Holdings Limited, Jacks Point Village Holdings No 2 Limited and Jacks Point Land Limited be recognised under the FTAA as being an occupier of land to which the substantive application relates,¹ as explained in paragraph 5 of the 3 October 2025 Memorandum.
- 7 Jacks Point Group refers to their correspondence with the fast-track team dated 22 September 2025 previously provided.
- 8 Correspondence with a fast-track applications advisor dated 10 October 2025 (attached as **Appendix 1**) confirmed that the 22 September 2025 letter was not actually provided to the Panel. Jacks Point Group

¹ Section 53(2)(i) FTAA 2024.

respectfully highlights their concern and disappointment that this letter was not passed on to the Panel despite explicit confirmation that it would be (as per the Appendix 2 email correspondence).

- 9 Jacks Point Group seeks confirmation from the Panel that the full list of Jacks Point Group entities have standing to Comment under section 53 of the FTAA on the Application.
- 10 Jacks Point Group also seek confirmation that there is no restriction under the FTAA on the scope of matters on which Jacks Point Group can comment. As the interests of the Jacks Point Group are wider than simply being adjacent landowners, their scope of intended comment will also be wider to reflect this.

Dated this 20th day of Octobe



Maree Baker-Galloway /annah Zynbos
Couns Il r the Jacks Point

**Appendix 1 – 10 October 2025 Email Correspondence with Fast-Track
Applications Advisor**

Hannah Zydenbos

From: Mel Prescott [REDACTED]
Sent: Friday, 10 October 2025 12:02 PM
To: Maree Baker-Galloway
Subject: Re: RCL Homestead Bay Limited Application FTAA-25-6-1071

Hi Maree,

The panel had not received the correspondence previously. We have changed the receipt of information so that shouldn't happen again.

Any requests may also be sent to info@fasttrack.govt.nz or please feel free to contact me.

Thanks,

Mel Prescott (she/her)

Advisor | Fast-track Applications



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From: Maree Baker-Galloway <maree.baker-galloway@al.nz>
Sent: 10 October 2025 10:51 AM
To: Mel Prescott [REDACTED]
Subject: RE: RCL Homestead Bay Limited Application FTAA-25-6-1071

Thanks Mel. And had the Panel previously received the correspondence from our clients, as they did not refer to it in their Minute 1?

Maree Baker-Galloway (she/her) | Partner | [Anderson Lloyd](#) | [d](#) +64 3 450 0736 | [m](#) +64 27 295 4704

From: Mel Prescott [REDACTED]
Sent: Friday, 10 October 2025 10:10 AM
To: Maree Baker-Galloway <maree.baker-galloway@al.nz>
Subject: Re: RCL Homestead Bay Limited Application FTAA-25-6-1071

Kia ora Maree,

Thank you for your clarification. I confirm that the panel has received your memoranda.

As your clients are parties that have been invited to comment and there is nothing in the Act that restricts the scope of those comments, this will be the appropriate avenue to set out the relevant interests and effects of the proposal as invited parties see them. We will await the official comments, noting comments must be received by 28 October 2025.

Please contact me if you have further questions.

Ngā mihi,

Mel Prescott (she/her)

Advisor | Fast-track Applications



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From: Maree Baker-Galloway <maree.baker-galloway@al.nz>

Sent: 06 October 2025 2:38 PM

To: Mel Prescott [REDACTED]

Subject: RE: RCL Homestead Bay Limited Application FTAA-25-6-1071

You don't often get email from maree.baker-galloway@al.nz. [Learn why this is important](#)

Hi Mel

Just for clarity, the two emails I sent last week were not our clients' official "Comments", but are instead seeking clarification from the Panel.

Kind Regards

Maree

Maree Baker-Galloway (she/her) | Partner | **Anderson Lloyd** | d +64 3 450 0736 | m +64 27 295 4704

From: Mel Prescott [REDACTED]

Sent: Friday, 3 October 2025 4:21 PM

To: Maree Baker-Galloway <maree.baker-galloway@al.nz>

Subject: Re: RCL Homestead Bay Limited Application FTAA-25-6-1071

Kia ora,

Thank you for your comments to the Expert Panel in relation to the Homestead Bay Fast-track application.

Under the Fast-track Approvals Act 2024, there is no requirement for the Expert Panel to hold a hearing. However, if the Expert Panel considers it appropriate to hold a hearing, at least five days' notice of the hearing will be given to those parties the panel considers appropriate to hear from.

Regardless of whether a hearing is held or not, the Expert Panel will invite you to comment on the draft conditions.

If you have any questions, please contact the Application Lead, Melita Raravula, by email at info@fasttrack.govt.nz.

Nāku noa, nā

Mel Prescott (she/her)

Advisor | Fast-track Applications



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From: Maree Baker-Galloway <maree.baker-galloway@al.nz>

Sent: 03 October 2025 7:38 AM

To: Fast-Track Info <info@fasttrack.govt.nz>

Cc: Laura McLaughlan <laura.mclaughlan@al.nz>; Hannah Zydenbos <hannah.zydenbos@al.nz>

Subject: RCL Homestead Bay Limited Application FTAA-25-6-1071

Please find attached Memorandum of Counsel for the attention of the Panel on behalf of Jacks Point Group entities.

Please acknowledge receipt.

Yours faithfully

Maree Baker-Galloway

Maree Baker-Galloway (she/her)

Partner

Anderson Lloyd

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**Appendix 2 - 22 September 2025 Email Correspondence with Fast-Track
Advisor**

Hannah Zydenbos

From: ContactFastTrack <contact@fasttrack.govt.nz>
Sent: Tuesday, 23 September 2025 8:53 AM
To: Maree Baker-Galloway
Cc: Hannah Zydenbos; Laura McLaughlan
Subject: Re: RCL Homestead Bay Fast-track consent FTA063

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Filed to ND

Kia ora Maree,

Thanks for that, I have ensured the second letter will be sent to the panel as well.

Let me know if you need anything further.

Ngā mihi,

Thomas
Customer Insight Advisor



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From: Maree Baker-Galloway <maree.baker-galloway@al.nz>
Sent: Monday, 22 September 2025 4:58 pm
To: ContactFastTrack <contact@fasttrack.govt.nz>
Cc: Hannah Zydenbos <hannah.zydenbos@al.nz>; Laura McLaughlan <laura.mclaughlan@al.nz>
Subject: RE: RCL Homestead Bay Fast-track consent FTA063

Thanks Thomas – yes this letter is in addition to our previous one, for a different client group.

Kind Regards

Maree

Maree Baker-Galloway (she/her) | Partner | **Anderson Lloyd** | [d +64 3 450 0736](tel:+6434500736) | [m +64 27 295 4704](tel:+64272954704)

From: ContactFastTrack <contact@fasttrack.govt.nz>
Sent: Monday, 22 September 2025 3:57 PM
To: Maree Baker-Galloway <maree.baker-galloway@al.nz>

Cc: Hannah Zydenbos <hannah.zydenbos@al.nz>; Laura McLaughlan <laura.mclaughlan@al.nz>

Subject: Re: RCL Homestead Bay Fast-track consent FTA063

Kia ora Maree,

Thanks for your email. I just want to confirm that this letter is in addition to your previous one dated 18/09? If so, I will ensure it is filed alongside your previous correspondence to be sent to the panel.

Ngā mihi,

Thomas

Customer Insight Advisor



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From: Maree Baker-Galloway <maree.baker-galloway@al.nz>

Sent: Monday, 22 September 2025 2:20 pm

To: ContactFastTrack <contact@fasttrack.govt.nz>

Cc: Hannah Zydenbos <hannah.zydenbos@al.nz>; Laura McLaughlan <laura.mclaughlan@al.nz>

Subject: RE: RCL Homestead Bay Fast-track consent FTA063

Please find attached correspondence for the attention of the Panel appointed for FTA063.

Maree Baker-Galloway ([she/her](#)) | Partner | **Anderson Lloyd** | d [+64 3 450 0736](tel:+6434500736) | m [+64 27 295 4704](tel:+64272954704)

I would be grateful if you could acknowledge receipt and that this has been passed on to the Panel.

Yours faithfully

Maree Baker-Galloway

Maree Baker-Galloway ([she/her](#))

Partner

Anderson Lloyd

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