

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 Residents and Owners Association Incorporated regarding expert conferencing

Date: 10/11/2025

Party's solicitors:

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May it please the Court

- 1 This memorandum is provided on behalf of the Jacks Point Residents and Owners Association Incorporated (**JPROA**) in response to Minute 3 of the Expert Panel dated 7 November 2025, 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 request an amendment to the proposed timetable and provide additional topics and issues for conferencing.
- 3 The Expert Panel Minute 3 proposed the Experts circulate their summary statements by **Friday, 14 November 2025**, for conferencing to occur on **Tuesday 18 November 2025** and that the JWS be circulated **no later than 5.00pm Wednesday 19 November 2025**.
- 4 JPROA's wastewater expert Mr Sandy Ormiston is unable to conference on Monday 17th or Tuesday 18th as he is contracted to be out of town presenting a Wastewater Training Course for the WSP Environmental Training Centre. We suggest the following amendments to the proposed timetable to allow Mr Ormiston's participation in the conferencing process:
 - (a) Experts to circulate summary statements to other experts by **Midday Thursday, 13 November 2025**;
 - (b) Conferencing to occur in part on **Friday, 14 November 2025 after 1.30pm**; and
 - (c) The remaining details of the JWS to be exchanged between the experts via email over the **17 and 18 November 2025** and to be circulated no later than **5.00pm on Wednesday 19 November 2025**.
- 5 Alternatively, Mr Ormiston is available to conference after 2pm on Wednesday 19 November.
- 6 Mr Ormiston also recommends adding the following topics to the list of issues to be addressed through conferencing:
 - (a) Feasibility of a treatment plant / proposed treatment to meet the treated effluent standards; and
 - (b) Extent of disposal area required for 1400 dwellings only.
 - (c) Removal of RCL's proposed disposal area that overlaps with JPROA's primary irrigation area.

- (d) Wet weather risks for I/I plus increased runoff risk from steep slopes in Areas 1 & 2.
 - (e) The risk to JPROA's water supply from the frequent flow of overland flow paths.
 - (f) Consideration of adaptive management for remedial action or works and a requirement that the Applicant meets the short- and long-term costs of these. In particular, to consider the case of non-compliance in the proposed disposal fields resulting in the contamination or compromise of JPROA's water supply from Lake Wakatipu.
 - (g) Consideration of consent conditions:
 - (i) Condition 29 requires no ponding or runoff. Proposed French Drains indicate ponding, and runoff is expected which is non-complying; and
 - (ii) Condition 28 only requires servicing 12 monthly. Suggestion to increase frequency to a minimum of 3 monthly servicing.
 - (h) Identification of reserve disposal areas.
 - (i) Fix irrigation rate at 7.1mm/d average and maximum of 8.0mm/d.
- 7 JPROA seek confirmation from the Panel that these topics be included in conferencing and that the proposed timetable be amended to accommodate the availability of Mr Ormiston.

Dated this 10th day of November 2025



Maree Baker-Galloway / Hannah Zydenbos
Counsel for Jacks Point Residents and Owners
Association Incorporated