

Submission on the RCL Homestead Bay Fast Track Application Proposed Subdivision Consent Conditions (QLDC)

Submitters: Maja Marshall, BA (Hons), Constructing Architect, on behalf of Maja & Andrew Marshall. [REDACTED] home owners

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To: The Homestead Bay (Lot 8) Fast Track Expert Panel

Attention: Jayne Macdonald - Homestead Bay Expert Panel Chair

Dear Ms Macdonald and panel members,

Thank you for the opportunity to comment on the Homestead Bay Fast Track Application Draft Decision and Conditions. Below response is limited to our key concerns.

In Response to section 13 Environmental Management Plan (EMP)

(ii) Operational Requirements

c) Dust management in accordance with the recommendations of The Good Practice Guide for Assessing and Managing Environmental Effects of Dust Emissions (MfE, 2016)

Regarding the Operational Requirements for dust management, we have significant concerns based on the developer's (RCL) past performance during the earthworks on LOT12 (RM200374/RM18113). Despite multiple complaints of dust infiltrating our homes, no mitigation measures were implemented.

The developer previously relied on narrow interpretations of District Plan rules—arguing that dust must be seen crossing a boundary to constitute a breach—rather than proactively managing effects as required by the MfE (2016) guidelines. "The proposed Dust Management Plan must be more than a formality. During the deposit of clean fill earthworks, our homes were covered in

dust inside and out. Despite photographic evidence of dust clouds, RCL evaded responsibility by claiming the dust wasn't 'documented' crossing the boundary line.

Since the site was grassed, dust levels have dropped significantly, proving the fill site was the primary source. Given that prevailing southerly winds blow directly into Jacks Point, 'common sense' agricultural practices (such as timing activities with weather patterns) were ignored by the developer. This history of poor management raises serious doubts about their willingness and ability to mitigate future dust and odour issues from the proposed WWTP holding tanks.

Also worth mentioning is that RCL was expected to run in the last of the fill to this site by February/March 2022, with final topsoiling and tidying to take place in March/April. After this date the site was to be discontinued and the consent complete at that point. More fill was deposited in December 2025. This is a breach of the consent conditions (RM200374/RM18113).

Email correspondence with QLDC attached as examples of RCL conduct in regard to respecting rules and guidelines.



Odour Concerns from proposed WWTP

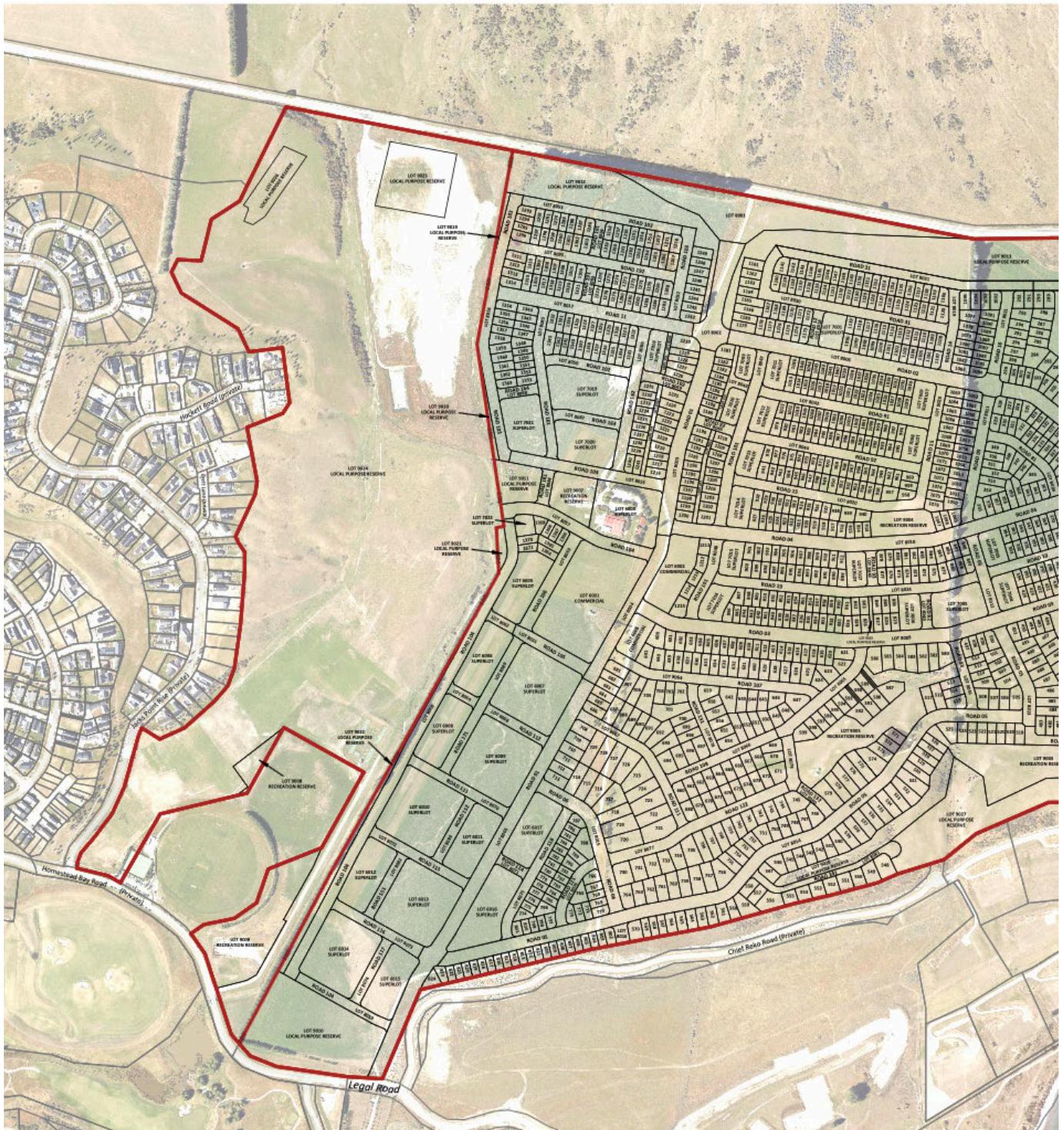
In Response to Draft-decision-17Dec - 239 Wastewater

'The construction and operation of a new on-site wastewater treatment plant and land disposal system is proposed to service the development. The treatment plant will be located adjacent to the proposed water treatment plant on the northwest corner of Lot 12, from where it will feed treated wastewater to irrigation areas across Lot 12 and parts of Lot 8.'

We object to the waste water treatment plant being located even closer to Jacks Point homes and sports fields. Placing a utility of this nature within the direct line of sight of residents is unacceptable. This treatment plant will significantly compromises the area's residential and recreational value. We urge that the facility be located at the southeastern boundary near the highway and Lot 8, ensuring it is both out of sight and at a maximum distance from our community and to ensure it is effectively screened from view and distanced from homes. I also question the practicality of the wastewater running uphill to the fields.

I am quite surprised at this suggestion. Perhaps the Panel's assessment is based on a **fundamental error** regarding the site's orientation. By assuming north is 'up' on the plans? If so the Panel has overlooked the true direction of the prevailing winds, leading to a significant failure in recognizing the gravity of the odor issues facing Jack's Point."

I would like to express my strong opposition to the proposed onsite Wastewater Treatment Plant being located on Lot 12 at Homestead Bay altogether. Based on the performance of existing infrastructure and past developer conduct, I have several critical concerns regarding the impact on the Jacks Point community.



Note: North is on left hand side on the 'Appendix-M-Subdivision-plans' not 'UP' meaning prevailing wind is coming from the proposed subdivision carrying odours and dust to existing Jacks Point residents and community.

1. Odour Mitigation and Environmental Impact

The current Shotover WWTP serves as a cautionary example, as noticeable odours frequently impact the surrounding area. Given that the prevailing southerly winds will carry any discharge odours directly toward existing Jacks Point residences.

- What specific technologies or redundancies will be implemented at Homestead Bay to ensure a "zero-odour" threshold? The 'Appendix-OO-Odour-Impact-Assessment' clearly show that odours will reach our community, even in the location shown on LOT 8 which is further away from Jacks Point residents.
- How will the developer mitigate the geographical reality that Jacks Point residents—rather than Homestead Bay residents—will bear the brunt of any failures in odour control?

HOMESTEAD BAY WASTEWATER TREATMENT PLANT ODOUR IMPACT ASSESSMENT

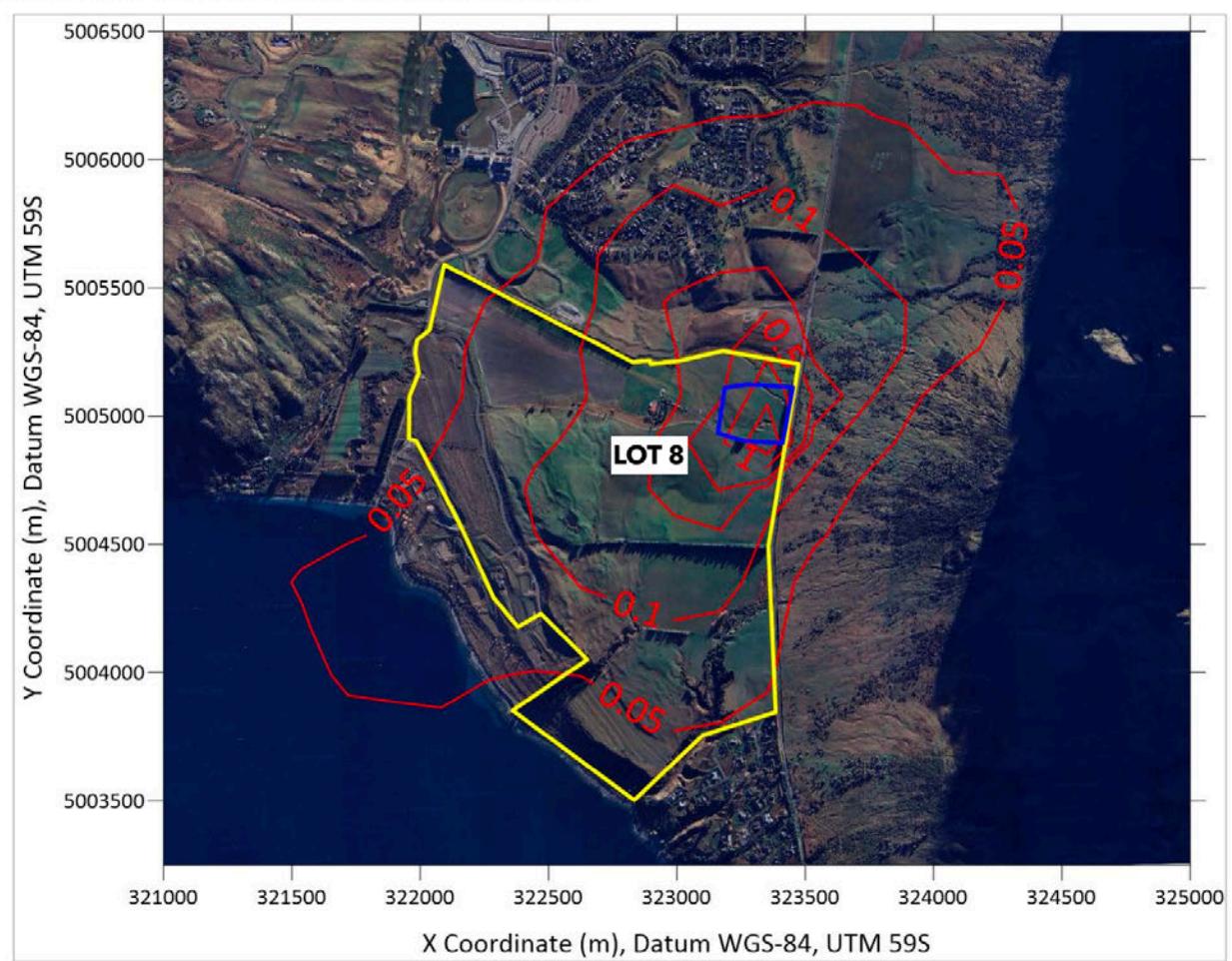


Figure 7-1 99.9th Percentile 1-hour average odour concentration for a 6 m OCU stack height

2. Operational Accountability and Maintenance

My confidence in the developer (RCL) is significantly diminished following the handling of dust pollution from the "dirt dumping" on Lot 12. This history suggests a barely reactive rather than proactive approach to environmental compliance.

- **Guarantees:** What legal mechanisms will be in place to guarantee that high-level maintenance is performed consistently?
- **Funding:** How will the long-term costs of "proper" maintenance be structured to ensure they do not become an undue burden on future residents or result in cost-cutting measures that lead to system failure?

3. Economic Comparison and Feasibility

The cost of a fit-for-purpose WWTP would be high. Considering the scale of the Fast Track application (including high-density housing, schools, and commercial zones), the cost of a private plant is likely comparable and far above to the value of the land itself.

4. Proposed Solution: Council Integration

While the Panel does not agree. I believe the only acceptable solution for the long-term protection of Jacks Point residents is for **Homestead Bay to connect directly to the Council's reticulated wastewater network.** To facilitate this, I propose the following:

- **Land Negotiation:** Lot 12 should be transferred into parts of Jacks Point and Council ownership.
- **Easements:** This transfer would provide the leverage needed to gain permission from the Jacks Point Residents Association (JPROA) to run a sewer line through Jacks Point land.
- **Buffer Zones:** This arrangement would ensure a permanent environmental buffer between Homestead Bay's high-density development and existing residential areas.

The developer's preference for speed, should not outweigh the Jacks Point community's right to a livable environment. Expanding the existing council network, is the only guaranteed way to prevent wastewater odors from impacting Jacks Point residents.

QLDC prefers the development to connect to its reticulated wastewater network. By establishing a Developer Agreement with clearly defined costs and responsibilities, the timeline for the council's network expansion could be significantly accelerated.