

21 January 2026

To the Expert Panel appointed to hear the RCL Homestead Bay application

FTAA-2506-1071

To the members of the Expert Panel

Comments From Lakeside Estates Homeowners Association In Response To Draft Conditions

- 1 We act for Lakeside Estates Homeowners Association (also known as Ōraka Homeowners Association and referred to as Ōraka throughout).
- 2 Ōraka represents all landowners, however of particular relevance, we confirm that the following parties are members (address provided in brackets):
 - 2.1 [REDACTED]
 - 2.2 [REDACTED]
 - 2.3 [REDACTED]
 - 2.4 [REDACTED]
 - 2.5 [REDACTED]
 - 2.6 [REDACTED]
- 2.7 Lot 60 DP 27520, which is a recreation area owned jointly (with each title within the Ōraka area owning a 1/39th share).
- 3 These comments are presented for Ōraka, in relation to the Homestead Bay application (FTAA-2506-1071) (**Application**) and in response to Minute 7 of the Expert Panel dated 17 December 2025.
- 4 Minute 7 directed the Environment Protection Agency (**EPA**) to provide the draft conditions to the Applicant, everyone who provided comments under s 53 Fast-track Approvals Act 2024 and all relevant local authorities or statutory bodies and specified that comments on the draft conditions must be received by 21 January 2026.
- 5 Ōraka provided comments on the Application to the Panel dated 28 October 2025 and is hence identified as a recipient of the draft conditions and whose comments are sought by the Panel.¹
- 6 Ōraka held a General Meeting (on 21 December 2025) to discuss the draft conditions and provide their comments.

¹ Minute 7 of the Expert Panel dated 17 December 2025 at [2].

7 Ōraka has engaged proactively with RCL in the course of this Application to resolve a number of its concerns that it raised in its initial letter to the EPA dated 7 February 2025, including the impacts of housing density (including noise and light pollution, and impacts on amenity values, particularly views), and the impacts of the proposal in an area surrounded by an Outstanding Natural Landscape.

8 Ōraka supports RCL's proposal in relation to its northern boundary of 1-meter-high earth mounding and the revised planting from mountain beech to shrubs with groups of smaller trees as a way to soften built form.

9 However, there remain some outstanding issues Ōraka wishes to provide comment on for the Panel's consideration, where it considers the conditions proposed by the Panel should be further refined.

9.1 **Ongoing protection of landscape mitigation:** Condition 51 requires (relevantly)

(m). Prior to s224c for Lots 1398 to 1403, the mounding and mitigation planting shown on 'Oraka Mitigation Proposals', Drawing No. L21 and 'Oraka Mitigation Proposals: Sections A & B', Drawing No. L01 both dated 22 October 2025 is to be implemented.

(nn). Prior to s224c for Lots 20 – 32, the mitigation planting shown on 'Oraka Mitigation Proposals', Drawing No. L21 and 'Oraka Mitigation Proposals: Sections C & D', Drawing No. L02 both dated 22 October 2025 is to be implemented.

9.2 Consent notices relating to several of the requirements of condition 51 are included in condition 55. However, we have not been able to locate a Consent Notice that requires the retention and maintenance of the mounding and/or mitigation planting required by conditions 51 (m) and (nn) above. Given some of the mounding and/or mitigation planting occurs on what will be private lots, it is critical that a Consent Notice protects that mitigation work to ensure future owners do not remove it. Ōraka seek that this condition be added to condition 55.

9.3 In addition to the implementation and maintenance of this mounding and planting, the consent conditions (and associated Consent Notices) should also require **replacement planting**. This provides long term protection of the landscaping agreed by all parties to be necessary to enable the granting of consent.

9.4 **Building height restriction:** Ōraka acknowledges that the Panel has accepted a 6 metre height limit in a small area (specifically a single row along the boundary), where Ōraka sought 5 metres. Ultimately, this still only enables single storey building, and so the slightly higher height limit is acceptable to Ōraka. However:

9.4.1 Condition 6 of the Land Use Consent states the maximum height for Lots 1 to 1438 is 8 metres. This contradicts the consent notice requiring a bespoke 6 metre height limit. Condition 6 of the Land Use Consent needs to refer specifically to the lots with a reduced height limit, to avoid confusion.

9.4.2 Ōraka had sought a significantly larger area to be managed by the lower (single storey) height limit, to reduce effects. It continues to consider this is appropriate and necessary, particularly in light of the reduced

mounding/planting accepted by the Panel. On that basis, Ōraka seeks that the 6 metre height limit be imposed on the following lots to better protect Ōraka amenity without changing density of the development:

- (a) 1391 – 1405
- (b) 1419 - 1430
- (c) 145 – 151
- (d) 20 – 35
- (e) 113 – 121
- (f) 80 -93
- (g) 46 - 62
- (h) 10 - 19

9.5 For ease of reference, included with this letter as **Appendix 1** are maps showing the proposed area over which the covenant limiting height to 6 metres would apply.

9.6 **State Highway buffer zone.** Ōraka is disappointed that the Panel did not include in the draft conditions a requirement for mounding and planting along the highway boundary to establish a State Highway buffer zone/screening. Possibly this is due to RCL stating that the area may be required for wastewater discharge, however there are still ways to ensure the area can be utilised as such, and also provide meaningful screening from the highway.

9.7 Ōraka continue to consider that excluding a requirement to protect viewpoints from the State Highway will have a detrimental impact on Queenstown as a whole. Ōraka acknowledges the existing developments of Hanley's Farm and Jacks Point, noting they have successfully implemented buffer zones that shield the developments from the highway, maintain a rural outlook and provide the Remarkables with a well vegetated green base for the entire Queenstown community and beyond to enjoy.

9.8 Ōraka have emphasised that the world class vistas along the highway must be protected, as they have been elsewhere along the State Highway. While Ōraka acknowledge the need to comply with the Governments directives for expediency, they submit that history will not look favourably on a decision that compromises these landscapes.

9.9 Jo Dey, for the Jacks Point residents, puts this well where she states *“after enjoying views of Lake Wakatipu for the previous 27 km since Kingston, it would be preferable to divert the traveller’s eyes towards the first views of the Remarkables for this section of highway rather than maintaining views to the lake across a foreground of dense housing or uniform rooflines”*. Ōraka agree with this statement wholeheartedly, and considers that mounding and planting along the highway is crucial to mitigate the distraction of a densely built up urban estate from the world class backdrop of the Remarkables. This has already been done well at neighbouring residential developments Jacks Point and Hanley's Farm. Following the precedents set by these two developments will maintain the amenity and outstanding landscape values for all to continue to enjoy including local residents, Queenstown residents and visitors from all over the world.

9.10 Ōraka respectfully requests that the Panel give further consideration to the inclusion of appropriate mounding and planting along the highway to provide protection to the outstanding natural landscape in which this proposal is taking place.

10 Thank you for your consideration of these comments.

Yours sincerely

A large black rectangular redaction box covering a signature.

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