

21 January 2026

Chair and Members of the Expert Panel

File: Homestead Bay

Environmental Protection Authority

Your ref: FTAA-2506-1071

Private Bag 63002

Waterloo Quay Wellington 6140

New Zealand

By email: fasttrack@epa.govt.nz

Dear / Tēnā koe,

Homestead Bay: Response To Draft Conditions under s70 Fast-track Approvals Act 2024

Please find attached to this letter the draft conditions of the Expert Panel showing requested changes (marked up) from Queenstown Lakes District Council (QLDC). The following is an outline of the key changes sought by QLDC to the proposed draft conditions:

Overall, the changes sought by are directed at ensuring the draft conditions function as a coherent, enforceable framework for a large, complex and long-term staged subdivision.

A chief concern from QLDC relates to the method and approval of any future asset or connection to council water and wastewater infrastructure. The suggested changes to Condition 5 have been included by QLDC to ensure connection to Council's assets is at the sole discretion of QLDC as owner of the network these assets would connect to. This is in accordance with QLDC's policy that ensures QLDC has discretion to ensure in taking on any new developer built asset or connection, that it is appropriate to take on (and won't be an undue burden to its ratepayers), and that the new asset can appropriately be accommodated such that it doesn't impact on QLDC's ability to manage its network. The inclusion of condition 5 b) is also critical for setting out that where any connection to the public network is sought, then the terms of any connection to the reticulated network would need to have been agreed, ensuring costs of this connection are not burdened by the rate payer.

Another chief concern of QLDC relates to the lapse date of both the subdivision consent and the land use consent. Whilst it is acknowledged that an extended lapse period is beneficial for allowing for all stages of the development to be completed, a lapse date does allow for no development to occur until closer to the lapsing date, thus the risk exists that no development will occur until year 13 or 14 for the subdivision consent, and year 23 and 24 for the land use consent. While the risk of this occurring could be low and may not be the intention, these extensive lapse dates as currently written would allow for this to occur. To mitigate this risk QLDC consider the lapse dates for these consents should be amended to reflect the stage approached with progressively longer lapse periods for the stages of development (both subdivision and land use). This will allow the final stages to be completed some years into the future whilst still ensuring expedient delivery of residential units as sought by the Fast-track Approvals Act 2024. Further flexibility may be added to allow stages to occur in different order

provided the applicant submits detailed updated staging plans at each stage outlining what works are required for that stage to comply with the corresponding conditions of consent.

QLDC has also sought targeted amendments to the certification and management plan conditions (Conditions 7–16) to clearly delineate responsibilities for the certification within council and to delegate responsibility to another agency where appropriate. This includes ensuring that contaminated land investigations, remediation action plans, are certified by Otago Regional Council, with QLDC relying on that specialist certification. In addition, clarifications are included on engineering acceptance and subdivision approvals from the prescribed certification as these processes are assessed under separate, established processes. These changes will minimise the risk of duplication, uncertainty and unnecessary delays in the subdivision approval process (at section 223 and s224(c) time).

The proposed refinements to the engineering, infrastructure and design conditions (Conditions 16–27) are similarly directed at ensuring long-term operability, safety and resilience of infrastructure. This includes:

- requiring compliance with QLDC's most up-to-date Land Development and Subdivision Code of Practice, clarifying design (including Engineering Acceptance of second water supply if not provided by council)
- monitoring requirements for water supply and wastewater systems
- strengthening transport and road safety provisions, including vehicle tracking, safety audits and pedestrian, cyclist connectivity and requiring wider upgrades to be timed based on up to date traffic modelling (Recent Traffic Modelling undertaken by QLDC referred to in the changes sought to the conditions are also attached to this letter).

Without these condition amendments, the development may be implemented in a manner that does not appropriately mitigate the generated traffic effects and would lock the development into outdated standards, constraining Council's ability to ensure infrastructure performs safely and effectively as the development and surrounding network evolves.

In summary, the changes sought by QLDC are not intended to revisit the merits of the development or alter its scale or form. Rather, they are necessary to ensure that the consent conditions operate as a practical, enforceable and future-proofed framework.

Yours sincerely, Nāku noa nā



Fiona Blight

Manager Resource Consents

