

## Online Further Submission

## Further Submitter #91

<b>Further Submitters Name</b>	Moana Kiff
<b>Further Submitter Number</b>	FS91
<b>Wish to be heard</b>	Yes
<b>FS qualifier</b>	a person representing a relevant aspect of the public interest (e.g. community group)
<b>FS qualifier reason</b>	Hapu Member of Te Whanau o Waiaua
<b>Joint presentation</b>	Yes
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<b>Online further submitter?</b>	Yes
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## FS 91.1 - 91.39

## Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	Support/Oppose	FS Decision requested	Reasons
FS91.1	Waiaua Bay Farm Limited	S463.004	Historic and Cultural Wellbeing	SD-CP-04	Delete Objective SD-CP-04 OR  Amend to clearly specify the outcome sought by this 'Social Prosperity' objective in a manner that is able to be implemented through the Proposed Plan in resource consent decision making; AND  Denote the objective prefix as "SP" rather than "CP".	Oppose	Disallow	We are opposed to deleting this point, as tangata whenua we support the promotion of communities and places in the Far North district that will serve the needs of both current population and future generations. These places should also be able to adapt to the effects of climate change.
FS91.2	Waiaua Bay Farm Limited	S463.005	Urban Form and Development	SD-UFD-02	Amend Objective SD-UFD-02 as follows:  SD-UFD-02 Urban growth and development <b>in the urban zones is</b> consolidated around existing	Oppose	Disallow	

					reticulated networks within town centres, supporting a more compact urban form, affordability and providing for a mix of housing typologies.			We support this objective, as it encourages sustainable, affordable and vibrant development, that can benefit both current and future residents of the area, for example Matauri Bay Papakāinga which has provided it's own reticulated networks enhancing the quality of life for the poorest region in New Zealand, Northland.
FS91.3	Waiaua Bay Farm Limited	S463.012	Infrastructure	I-O4	Amend Objective I-O4 as follows:  <del>I-O4 Adverse effects of infrastructure are managed through</del> The design and location of infrastructure <b>is managed</b> to minimise adverse effects on areas with historical and cultural values, natural values, and coastal values.	Oppose	Disallow	We fully support the rule which emphasizes the management of adverse effects of infrastructure. This rule's focus on designing and locating infrastructure to minimize negative impacts on the areas with historical and cultural values, natural values, and coastal values aligns with our commitment to preserving these important aspects of our community and environment. By implementing this rule effectively, we can ensure that our infrastructure development is carried out responsibly and in a way that respects our cultural heritage and natural resources.
FS91.4	Waiaua Bay Farm Limited	S463.015	Infrastructure	I-P4	Amend Policy I-P4 as follows:  I-P4 Provide for infrastructure where there are benefits such as:  a. <del>significant</del> social, economic and cultural benefits associated with regionally significant infrastructure ...	Oppose	Disallow	Retaining the word "significant" helps maintain clarity effective resource allocation, and ultimately benefits the region by ensuring that the most impactful projects receive attention and investment, especially in our poorest communities.
FS91.5	Waiaua Bay Farm Limited	S463.017	Infrastructure	I-P14	Delete Policy I-P14	Oppose	Disallow	

"We strongly support the inclusion of policy I-P14 in the district plan. This policy is crucial in ensuring the infrastructure development is carefully managed to address the effects of activities requiring resource consent., It provides a comprehensive framework that considers critical factors such as environmental impacts and cultural values. Deleting this policy could lead to fragmentation and confusion in addressing these crucial matters."

FS91.6	Waiaua Bay Farm Limited	S463.018	Transport	TRAN-O2	Retain Objective TRAN-O2	Oppose	Disallow	The word "avoid" better aligns with our commitment to preserving our cultural heritage and natural environment.
FS91.7	Waiaua Bay Farm Limited	S463.019	Transport	TRAN-P2	Amend points b. and f. of Policy TRAN-P2 as follows:  b. <del>avoids and mitigates</del> <b>manages</b> adverse effects on historical, cultural and natural environment values to the extent practicable;  f. provides for existing and future pedestrian and cycling pathways, including the Pou Herenga Tai Twin Coast Cycle Trail <b>where appropriate.</b>	Oppose	Disallow	"Avoids" and "mitigates", better aligns with our commitment to preserving our cultural heritage and natural environment.
FS91.8	Waiaua Bay Farm Limited	S463.029	Ecosystems and indigenous biodiversity	IB-P2	Delete sub-clause b. of Objective IB-P2 or amend it to clarify the reference to "important and vulnerable" features.	Oppose	Disallow	



We whole heartedly support sub clause ( b )of IB-P2, which emphasises the importance of avoiding significant adverse effects and addressing remedying or mitigating other adverse effects of land use and sub division on areas of important and vulnerable indigenous vegetation, habitats and eco systems within the coastal environment. This sub clause underscores the critical need to protect and conserve these ecologically valuable areas. We believe that sub clause (b) is essential for maintaining the ecological health and diversity of our coastal environment while ensuring responsible and sustainable land use and development practices. It aligns with our commitment to preserving the natural heritage of our region and contributing to the well being of both our communities and our unique eco-system.

FS91.9	Waiaua Bay Farm Limited	S463.034	Natural character	NATC-01	Delete Objective NATC-01	Oppose	Disallow
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We strongly support NATC-01 as it encapsulates the essential principle of preserving and protecting the natural character of our wetland, lake, and river margins for the benefit of current and future generations. This objective aligns with our commitment to responsible and environmental stewardship and ensuring the lasting integrity of these critical eco-systems. We respectfully disagree with Waiaua Bay Farms request to delete NATC-01. While they argue that it resembles RMA6(a) and contains vague references, we believe that this objective provides a clear and specific focus on the long term protection of these natural areas. It emphasises the importance of safeguarding their unique qualities while allowing for responsible activities that do not compromise their well-being. We advocate for retaining NATC-01 in the plan as it signifies our dedication to balancing human activities with the conservation of our natural character areas, ensuring that they remain valuable assets for both present and future generations.

FS91.10	Waiaua Bay Farm Limited	S463.035	Natural character	NATC-02	Amend Objective NATC-02 as follows:  NATC-02 Land use and subdivision is consistent with and does not compromise maintains or enhances the characteristics and qualities of the natural character of wetland, lake and river margins.	Oppose	Disallow	We support the original policy which aligns with our commitment to preserving the natural character of these areas without the proposed amendment.
FS91.11	Waiaua Bay Farm Limited	S463.040	Natural character	Rules	Insert a new rule as follows:  <b>NATC-R[X]</b>  <b>Activity Status: Restricted Discretionary</b>  <b>Where:</b>	Oppose	Disallow	We vehemently oppose the proposed addition of new rule NATC-R[X] in the Far North District plan as submitted by Waiaua Bay Farms. We believe that this new rule would not only compromise the natural character of our area but also have a profound negative

## **RDIS-1**

**Tracks not for conservation or pest control purposes.**

**Matters of discretion:**

**1. The location and purpose of the proposed track or fence, its alignment and potential adverse effects on the high natural character area, including fragmentation and loss of biodiversity;**

**2. Whether any proposed indigenous vegetation disturbance associated with the activity will result in loss of habitat that supports or provides a key life function for 'threatened' or 'at risk' indigenous species; and**

**3. The extent to which unavoidable adverse effects of the proposed indigenous vegetation disturbance associated with the activity on areas of significant biodiversity can be remedied or offset through established or new biodiversity restoration programmes.**

but also have a profound negative impact on our papakainga and sites of spiritual importance. The introduction of a tourist attraction through the construction of walking trails threatens to disrupt the tranquility and sacredness of these areas. Any development would undermine our efforts to protect and pass down our traditions stories and values to future generations. In this case, the proposed rule seems to prioritize tourism at the expense of our cultural and spiritual well-being. We as neighbours and mana whenua strongly oppose the transformation of our sacred areas into tourist attractions. It is vital that our cultural and spiritual well-being are safe guarded, in any development that compromises these values should not be permitted.

The HNC overlay is essential for preserving the unique natural character of our area. Allowing a restricted discretionary consenting pathway for the construction of walking trails within this zone could result in fragmentation and loss of bio diversity, undermining the purpose of the HNC overlay. The proposed rule does not provide adequate safeguards against potential indigenous vegetation disturbance and its impact on threatened or at risk indigenous species. The loss of habitat could have far reaching consequences for our local eco system. While the proposed rule mentions the possibility of remedying or offsetting adverse effects, it lacks clear guidelines on how this will be achieved. The extent of bio diversity restoration programmes is vague, leaving room for inadequate mitigation. Preserving our natural character should be a top priority. The development of residential lots

The development of residential use raises significant concerns about the potential degradation of our coastal environment. Increased human activity, infrastructure development and population density may disrupt the natural balance of this unique ecosystem. Our wild beach is a rare and valuable asset which should be protected. An increase in residents and potential tourism associated with the residential development may lead to higher visitor pressure to the beach. This could disrupt the natural solitude and tranquility that Waiaua Bay currently offers. It is essential that the Far North District Council takes into account not only the immediate economic benefits of development but also the long term consequences on our environment.

FS91.12	Waiaua Bay Farm Limited	S463.113	Kauri Cliffs	KCZ-R4	Delete the reference to the Kauri Cliffs zone in Rule KCZ-R4 and amend Rule KCZ-R4 as follows: Commercial activities <b>including are</b> for the purpose of:  1. Conferences.  2. Eating and dining facilities.  3. Gym and <del>beauty</del> spa facilities.  <b>4. Tourism and hospitality including tours and events.</b>  5. Retail activities associated with golf, and other <del>ancillary</del> recreation, <b>visitor accommodation or the above activities.</b>	Oppose	Disallow	We support the original provision, KCZ-R4, as it has been in place to regulate commercial activities in the lodge sub zone of the kauri cliffs zone. The existing rule already allows a reasonable range of activities that aligns with the zones objectives. It is crucial to maintain the balance between enabling necessary commercial activities while preserving the unique character and environmental consideration of the area. Therefore, we recommend retaining the current provision to ensure responsible and sustainable development within the Lodge sub zone.
FS91.13	Waiaua Bay Farm Limited	S463.114	Kauri Cliffs	KCZ-R5	Delete the reference to the Kauri Cliffs zone in Rule KCZ-R5 and amend Rule KCZ-R5 as follows: PER-1 Infrastructure <del>real facilities are</del> associated with the operation and	Oppose	Disallow	We support the original provision, WBF should provide further information to better understand their proposed alteration.

maintenance **of the Lodge or golfing, recreation, hospitality or visitor accommodation activities in the Lodge subzone** ~~the Lodge and associated accommodation.~~

FS91.14	Waiaua Bay Farm Limited	S463.115	Kauri Cliffs	KCZ-R6	<p>Delete the reference to the Kauri Cliffs zone in PER 1 of Rule KCZ-R6 and amend PER-1 as follows:</p> <p>PER-1 The facilities or activities associated with the <del>H</del>Lodge where they have been lawfully established.</p> <p>Delete PER 2 of Rule KCZ-R6</p> <p>Delete the reference to the Golf living-sub zone and include the Lodge-sub zone in PER 3 of Rule KCZ-R6 and amend PER-3 reference to PER-2 (as current PER-2 has been deleted as per above). As a consequence, delete the reference to PER-3 from the right-hand column of Rule KCZ-R6.</p> <p>Amend points a and c of the matters of discretion for Rule KCZ-R6 as follows:</p> <p>a. Any adverse visual effects on the natural environment and the extent to which mitigation measures ensure that such effects are <del>no more than minor</del> <b>managed</b></p> <p>c. the extent to which the proposal has been formulated to avoid, remedy or mitigate adverse effects, on any <b>significant</b> archaeological <del>values resources or natural</del> <b>indigenous</b> fauna;</p>	Oppose	Disallow	Retain original provision. Golf courses require substantial amounts of water, straining local water resources and the harmful effects of pesticides herbicides and fertiliser which can harm the environment, needs to be carefully monitored.
FS91.15	Waiaua Bay Farm Limited	S463.119	Kauri Cliffs	KCZ-R16	<p>Amend the title of Rule KCZ-R16 as follows: KCZ-R16 Primary Production</p>	Oppose	Disallow	We support the original provision.



(excluding farming, mining and aquaculture)

FS91.16	Waiaua Bay Farm Limited	S463.120	Kauri Cliffs	KCZ-S1	Amend point 1. of Standard KCZ-S1 as it relates to the Kauri Cliffs zone:Lodge sub-zone as follows:  1. The maximum footprint of a new building or structure is <del>25</del> <b>350</b> m <sup>2</sup> .	Oppose	Disallow	Retain original provision. WBF argues that there is ample potential to manage effects of larger structures particularly on landscape values. For example The recent Resources application and building consent approved by FNDC, to allow WBF to construct a 300 plus m2 monstrosity within an ONL zone with the same 25m2 GFA rule, would indicate WBFs disregard for any negative environmental effects of larger structures in our pristine coastal environment.
FS91.17	Waiaua Bay Farm Limited	S463.122	SCHED8 - Schedule of Outstanding natural character	SCHED8 - Schedule of Outstanding natural character	Delete ONC80 from Schedule 8 - Schedule of Outstanding natural character	Oppose	Disallow	We seek to retain schedule D8, ONC80, schedule of outstanding natural character. The stark contrast between WBFs highly manicured, artificial landscape of the golf course and the Totara Forest. The Totara Forest aligns with the criteria for natural outstanding character. We would argue that the forest is more than a pleasant area as it provides habitat for wildlife and the overall contribution of the forest to the local eco system.
FS91.18	Waiaua Bay Farm Limited	S463.123	Planning maps	General / Miscellaneous	Amend the planning maps as set out in Annexure B to this submission with respect to:  The RPROZ, Kauri Cliffs Zone and its constituent subzones  The Piakoa wāhi tapu site.  Delete the mapping of ONC80.	Oppose	Disallow	

We object to the proposed mapping changes, we have deep concerns about the potential impacts of these mapping and zoning changes.  
 Tangata whenua refers to the indigenous people of New Zealand. They are the original Māori inhabitants of the land and have a unique cultural and historical connection to the land.

FS91.19	Waiaua Bay Farm Limited	S463.089	Rural production	RPROZ-O1	Amend Policy RPROZ-O1 to clarify the outcome that this objective seeks.	Oppose	Disallow	89 Oppose; We want to retain long term protection for current and future generations. By combining legal safeguards, cultural stewardship, sustainable land management, education, collaboration, resource allocation, climate adaptation, and Treaty recognition, New Zealand can ensure the long-term protection of Whenua Māori. This approach will not only benefit the current generation but will also honour the legacy of the past and provide a strong foundation for future generations to thrive while maintaining their cultural heritage and connection to the land.
FS91.20	Waiaua Bay Farm Limited	S463.090	Rural production	RPROZ-O2	Retain Objective (inferred) RPROZ-O2	Oppose	Disallow	

Oppose; We disagree that this policy be supported because we contend that a residential development is NOT 'a compatible activity that has a functional need to be in a rural environment.' The rural environment contains neighbouring hāpu properties that will be detrimentally impacted on and therefore a residential development is not considered to be a compatible activity in a rural coastal zone. The incompatibility of a large-scale residential development in a rural coastal zone environment for Tangata Whenua, is rooted in the potential harm to cultural heritage, ecological damage, resource competition, urbanization, infrastructure challenges, climate vulnerability, and the disruption of traditional practices. Preserving these rural coastal areas in their natural state or with minimal disturbance is vital to safeguarding the cultural and environmental heritage of local Hapū as Tangata Whenua.

FS91.21	Waiaua Bay Farm Limited	S463.091	Rural production	RPROZ-P1	Retain Policy RPROZ-P1	Oppose	Disallow
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Oppose; we consider that primary production producers should be wholly responsible for all adverse effects caused by primary production activities, and not 'where practicable'. Making primary production producers wholly responsible for their activities, without limiting this responsibility to what is practicable, as this promotes accountability, prevents the externalization of costs, incentivizes innovation, protects public goods, ensures legal clarity, builds consumer confidence, and supports long-term sustainability. This approach aligns with the principles of responsible and ethical production, benefiting both producers and society.

FS91.22	Waiaua Bay Farm Limited	S463.092	Rural production	RPROZ-P2	Amend point b. of Policy RPROZ-P2 as follows:  b. enabling a range of compatible activities that support primary production activities, including ancillary activities ( <b>including staff accommodation</b> ), rural produce manufacturing, rural produce retail, visitor accommodation and home businesses.	Support	Allow	Support accommodating workers.
FS91.24	Waiaua Bay Farm Limited	S463.093	Rural production	RPROZ-P7	Delete Policy RPROZ-P7	Oppose	Disallow	

Oppose; RPROZP7 is supported that it remains in its entirety, particularly para (j) pertaining to Tangata whenua. The Section 32 Report on Tangata Whenua is a significant document in New Zealand that addresses the relationship between Māori people/Tangata Whenua and various policy or development proposals. It is a requirement under the Resource Management Act 1991, and it serves as a critical assessment tool for decision-makers when considering the social, cultural, and economic impacts of proposed projects. In essence, this report aims to strike a balance between development and the protection of Māori cultural and environmental interests. The Section 32 Report concludes with recommendations for decision-makers, including whether the proposal should proceed, be amended, or declined based on its findings.

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Overall, the Section 32 Report on Tangata Whenua serves as a critical tool in the decision-making process by ensuring that the concerns and interests of Māori communities are taken into account when considering developments or policies that may affect their cultural, social, and economic well-being. It reflects New Zealand's commitment to honouring the Treaty of Waitangi and recognizing the importance of Māori perspectives and resource management and policy

development.

FS91.25	Waiaua Bay Farm Limited	S463.094	Rural production	RPROZ-R1	Retain Rule RPROZ-R1	Support in part	Disallow in part	Partly support; on the basis that it pertains to farming related buildings and the like, that does not include a residential housing development.
FS91.26	Waiaua Bay Farm Limited	S463.097	General	General / Plan Content / Miscellaneous	Amend the Special Purpose Zone - Kauri Cliffs ("KCZ") as set out in the track-change version of the zone attached to the submission and as stated within the submission	Oppose	Disallow	

Oppose; comments relating to annexure C that KCZ-01 Objective, EXCLUDE residential activities and supporting facilities and services. Also KCZ-P1 Policy, for the final option to be EXCLUDED i.e 'or delivers a master planned residential development.' We note the use of the word 'OR' here, so this denotes it's either one or the other option.

KCZ-P5 – amended wording in this policy has minimised KCZ's responsibility regarding any adverse effects. The original words of limited, avoided, remedied and mitigated should REMAIN.

KCZ – P6 same as above

KCZ- P7 remove residential activities and retain original wording, for golf-living activities.

Rules/Note; Para 1, delete red amendment entirely, KCZ should not have paramountcy over District Wide Rules or Coastal Environment Chapter.

KCZ-R2 – an increase in the amount of dwellings from 8 to 22 is excessive and needs to be monitored and controlled

PER32 – para (c) to EXCLUDE amendments and retain original wording to protect the natural environment and to include cultural historical significant factors.

KCZ-R16 Subtitle to be clarified, why mining and aquaculture?

KCZ-S1 Object under para (1) on basis that the increase in maximum structure has gone from 25m squared to 350m squared. This is incredibly excessive.

(ODP – operational district plan).

FS91.27	Waiaua Bay Farm Limited	S463.098	Kauri Cliffs	Overview	<p>Delete the Overview as drafted and insert revised Overview as follows:</p> <p><b>Kauri Cliffs is a large landholding located between Matauri Bay to the north and Tākou Bay to the south.</b></p> <p><b>While much of the property is used for farming, the portion of Kauri Cliffs contained in the Kauri Cliffs Zone is internationally recognised as a prestigious golfing facility and luxury accommodation and recreation destination.</b></p> <p><b>Activities in the Kauri Cliffs Zone are controlled by four subzones, the:</b></p> <p><b>Lodge subzone;</b></p> <p><b>Golf Playing subzone;</b></p> <p><b>Golf Living subzone; and</b></p> <p><b>Natural Heritage subzone</b></p> <p><b>These subzones provide specific development frameworks intended maintain the character, features and landscape of the Kauri Cliffs Zone.</b></p> <p><b>A championship standard golf course has been developed in the Golf Playing subzone. The development of an additional golf course and ancillary facilities is provided for in areas mainly to the west of the existing golf course.</b></p> <p><b>The Lodge at Kauri Cliffs is situated centrally in the Lodge subzone. The Lodge provides accommodation, dining, hospitality, golf-related retailing and guest and visitor activities and events. Guest and visitor facilities separate to the Lodge include a spa, gym, sports courts</b></p>	Oppose	Disallow	<p>OPPOSE – On the basis of not having had any disclosure by KC of ‘the comprehensive master planned subdivision of land in the Golf Living subzone to create up to 60 lots for subsequent residential development is provided for on a restricted discretionary basis’, we assert that KC needs to have a higher responsibility to consult with neighbouring parties for such a large and economic subdivision and the environmental impacts this would bring to the whenua and moana. It is therefore relevant to refer to The Section 32 Report on Tangata Whenua. It is a significant document in New Zealand that addresses the relationship between Māori people/Tangata Whenua and various policy or development proposals. It is a</p> <p>3</p> <p>requirement under the Resource Management Act 1991, and it serves as a critical assessment tool for decision-makers when considering the social, cultural, and economic impacts of proposed projects. In essence, this report aims to strike a balance between development and the protection of Māori cultural and environmental interests. The Section 32 Report outlines several key elements:</p> <ul style="list-style-type: none"> <li>☰ Policy Context: It provides context for the proposed policy or development, explaining why it is necessary and the issues it aims to address.</li> <li>☰ Objectives: The report clarifies the objectives of the proposed</li> </ul>
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and pools.

**Detached visitor accommodation units are located north of the Lodge. The development of new visitor accommodation and family-oriented recreational facilities are also provided for in the Lodge subzone.**

**The comprehensively master planned subdivision of land in the Golf Living subzone to create up to 60 lots for subsequent residential development is provided for on a restricted discretionary basis. This development will need to deliver appropriate services and amenity for future residents, within the Golf Living subzone and Lodge subzone and more widely around Kauri Cliffs, such as walking and cycling paths to provide access to services and points of interest.**

**The activities in the Kauri Cliffs Zone contribute significant economic value to the Far North district through the tourism, hospitality and employment opportunities it generates, as well as via operational and capital expenditures.**

**Large areas set aside for ecological restoration are present throughout the Kauri Cliffs Zone and wider property.**

**Future development and activities in the Kauri Cliffs Zone will continue to support the protection and enhancement of environmental values**

policy or development and how it aligns with relevant legislation and planning documents.

☰ Alternatives: It assesses alternative approaches or options, considering their potential impacts on Tangata Whenua and their cultural and environmental values.

☰ Consultation: The report details the consultation process undertaken with Tangata Whenua and the extent to which their views and concerns have been considered.

☰ Effects on Tangata Whenua: It evaluates the likely effects of the proposal on Tangata Whenua, including social, cultural, and economic impacts, and whether any adverse effects can be mitigated.

☰ Mitigation Measures: If adverse effects are identified, the report outlines proposed mitigation measures to address these impacts.

☰ Overall Assessment: It provides an overall assessment of the proposal, weighing its benefits against the potential adverse effects on Tangata Whenua.

☰ Conclusion: The Section 32 Report concludes with recommendations for decision-makers, including whether the proposal should proceed, be amended, or declined based on its findings.

Overall, the Section 32 Report on Tangata Whenua serves as a critical tool in the decision-making process by ensuring that the concerns and interests of Māori communities are taken into account when considering developments or policies that may affect their cultural, social, and economic well-being. It

								social, and economic well-being. It reflects New Zealand's commitment to honouring the Treaty of Waitangi and recognizing the importance of Māori perspectives in resource management and policy development.
FS91.28	Waiaua Bay Farm Limited	S463.099	Kauri Cliffs	KCZ-01	Amend Objective KCZ-01 as follows:  <del>KCZ-01 The Kauri Cliffs zone is developed To maintain and</del> <b>enhance</b> operate an international standard golfing facility, <b>premier</b> visitor accommodation <b>destination, and ancillary guest</b> facilities, including conference, gym, spa, <b>hospitality</b> , recreation and <del>eating/dining facilities as well as golf living facilities and</del> <b>residential activities and supporting facilities and services.</b>	Oppose	Disallow	OPPOSE – outside the current provisions of KC SZ, why are they asking for special treatment outside of normal hardworking applicants? They shouldn't be treated as special just because they are wealthy. If their subdivision is outside of their current special zone, why don't they comply with the same zoning rules like everyone else? If KC special zone is not fit for purpose, they should do away with it altogether!
FS91.29	Waiaua Bay Farm Limited	S463.100	Kauri Cliffs	KCZ-02	Amend Objective KCZ-02 as follows:  <del>KCZ-02</del> <b>New uses, development and subdivision maintain and enhance significant natural character, conservation and environmental values</b> <del>The natural characteristics and qualities that contribute to conservation and environmental values in the Kauri Cliffs zone are protected when undertaking land use and subdivision.</del>	Oppose	Disallow	OPPOSE – We object to the key objective for the zone and wish to keep the original character and environment. We disagree that any intended new uses, development and subdivision will enhance the significant natural character of their existing and neighbouring conservation and environmental values. We don't believe Papatūānuku can be usurped by human interference.
FS91.30	Waiaua Bay Farm Limited	S463.101	Kauri Cliffs	KCZ-P1	Amend Policy KCZ-P1 as follows:  <del>KCZ-P1 Provide for land use and subdivision in the Kauri Cliffs zone where it that</del> maintains or enhances the <del>purpose of the zone as an</del> internationally recognised golfing, <b>recreation, tourism</b> and luxury accommodation facility <b>or delivers a master planned</b>	Oppose	Disallow	

residential development.

OPPOSE – We object to KCZ-P1 being amended due to the nature and impacts that the planned subdivision will have on Hāpu, whenua and moana as its closest neighbours. We refer to the Section 32 report again regarding Tangata Whenua. The Section 32 Report on Tangata Whenua is a significant document in New Zealand that addresses the relationship between Māori people /Tangata Whenua and various policy or development proposals. It is a requirement under the Resource Management Act 1991, and it serves as a critical assessment tool for decision-makers when considering the social, cultural, and economic impacts of proposed projects. In essence, this report aims to strike a balance between development and the protection of Māori cultural and environmental interests. The Section 32 Report outlines several key elements:

- ☰ Policy Context: It provides context for the proposed policy or development, explaining why it is necessary and the issues it aims to address.
- ☰ Objectives: The report clarifies the objectives of the proposed policy or development and how it aligns with relevant legislation and planning documents.
- ☰ Alternatives: It assesses alternative approaches or options, considering their potential impacts on Tangata Whenua and their cultural and environmental values.
- ☰ Consultation: The report details the consultation process undertaken with Tangata Whenua and the extent to which

their views and concerns have been considered.

▮ Effects on Tangata Whenua: It evaluates the likely effects of the proposal on Tangata Whenua, including social, cultural, and economic impacts, and whether any adverse effects can be mitigated.

▮ Mitigation Measures: If adverse effects are identified, the report outlines proposed mitigation measures to address these impacts.

▮ Overall Assessment: It provides an overall assessment of the proposal, weighing its benefits against the potential adverse effects on Tangata Whenua.

▮ Conclusion: The Section 32 Report concludes with recommendations for decision-makers, including whether the proposal should proceed, be amended, or declined based on its findings.

Overall, the Section 32 Report on Tangata Whenua serves as a critical tool in the decision-making process by ensuring that the concerns and interests of Māori communities are taken into account when considering developments or policies that may affect their cultural, social, and economic well-being. It reflects New Zealand's commitment to honouring the Treaty of Waitangi and recognizing the importance of Māori perspectives in resource management and policy development.

FS91.31	Waiaua Bay Farm Limited	S463.102	Kauri Cliffs	KCZ-P2	Amend Policy KCZ-P2 as follows:  KCZ-P2 <del>6</del> Provide for the development of future golf courses and their ancillary structures and	Oppose	Disallow	OPPOSE – KCZ-P2, object on similar grounds under submission point 97.
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					staff accommodation within the 'Golf playing subzone' in the Kauri Cliffs zone while <del>ensuring that any adverse effects of development are avoided, remedied or mitigated</del> <b>managing any adverse effects of the development.</b>			
FS91.32	Waiaua Bay Farm Limited	S463.104	Kauri Cliffs	KCZ-P4	Amend Policy KCZ-P4 as follows:  KCZ-P4 <b>5 Enable tourist and golf related activities and provide for the limited extension of the existing guest-cottage visitor accommodation units</b> in the Kauri Cliffs <b>Lodge sub-</b> zone where the adverse effects can be <del>avoided, remedied or mitigated</del> <b>managed.</b>	Oppose	Disallow	OPPOSE – SAME AS ABOVE, object on similar grounds under submission point 97.
FS91.33	Waiaua Bay Farm Limited	S463.106	Kauri Cliffs	KCZ-P6	Amend Policy KCZ-P6 as follows:  KCZ-P6 <b>7 Provide for residential activities in the Golf Living subzone more than 0.5 km inland from the coast and require the siting, design and landscaping to manage effects on the rural and coastal landscape character</b> <del>'golf living' activities in the Kauri Cliffs zone, where it is consistent with an open rural landscape character and located more than 0.5 km inland from the coast.</del>	Oppose	Disallow	OPPOSE – Object and retain original wording of KZ7-P6.
FS91.34	Waiaua Bay Farm Limited	S463.107	Kauri Cliffs	KCZ-P7	Amend Policy KCZ-P7 as follows:  KCZ-P7 <b>3 Ensure development in the Kauri Cliffs Zone is appropriately sited and serviced to manage adverse effects on the values of the coastal environment</b> <del>that the siting of buildings in the Kauri Cliffs zone is undertaken in a manner which minimises the impacts of activities and development in the coastal environment, including the provision for adequate infrastructure servicing.</del>	Oppose	Disallow	OPPOSE – KCZ P7 what they are proposing is the exact opposite of the original statement, that the new interpretation of their duty is less than what it was!

FS91.35	Waiaua Bay Farm Limited	S463.108	Kauri Cliffs	KCZ-P8	Amend Policy KCZ-P8 as follows:  KCZ-P84 <b>Maintain or improve road and air access to the Kauri Cliffs Zone if necessary to support new land uses or developments in</b> <del>Ensure that any land use or development undertaken in the Kauri Cliffs zone maintains or improves road and air access to the zone.</del>	Oppose	Disallow	OPPOSE – KCZ P8 on grounds that their reasoning is ridiculous.
FS91.36	Waiaua Bay Farm Limited	S463.109	Kauri Cliffs	Notes	Amend Note 1 as follows:  1. There may be other rules in Part 2-District-Wide Matters of the District Plan that apply to a proposed activity, in addition to the rules in this zone chapter, including the Transport, Hazardous Substances, Noise, Light and Signage chapters. These District-Wide rules may be more stringent than the rules in this chapter. <b>However, in the event of conflict between the provisions of the Kauri Cliffs Zone and the provisions of the Coastal Environment chapter, the zone provisions prevail.</b> Ensure that relevant District-Wide Matters chapters are also referred to in addition to this chapter...	Oppose	Disallow	Kauri Cliffs with their significant wealth and influence should not elevate them above anyone else. Special treatment or exception should not be granted arbitrarily. Kauri Cliffs should comply with existing laws and regulations .
FS91.37	Waiaua Bay Farm Limited	S463.110	Kauri Cliffs	KCZ-R1	Retain Rule KCZ-R1	Oppose	Disallow	OPPOSE – KCZ-R1 support the original wording in its entirety (i.e 25m squared).
FS91.38	Waiaua Bay Farm Limited	S463.111	Kauri Cliffs	KCZ-R2	Delete the reference to the Kauri Cliffs zone from PER-1 of Rule KCZ-R2 and amend as follows:  PER-1  <b>No more than 22 visitor accommodation units including the existing Owner's Cottage and Residences.</b> <del>New buildings for the purpose of visitor accommodation does not exceed 8 guest cottages.</del> Delete PER-2 of Rule KCZ-R2	Oppose	Disallow	

– We firmly believe that the proposed change to "Lodge-sub zone" is not in the best interests of the community and the environment. Our reasons for opposing this amendment are as follows. It is essential to preserve the integrity of the KCZ and ensure that planning decisions align with the broader goals of environmental protection and community well-being. The proposed amendment appears to accommodate future developments within the 2017 subdivision area for visitor accommodation. However, this approach may have adverse effects on the environment, infrastructure, and the quality of life for local residents. We believe that any potential developments should be subject to rigorous evaluation and scrutiny to ensure their compatibility with the broader community and environmental interests. Stakeholder Engagement: It is crucial to engage with all stakeholders, including local residents and indigenous communities, to determine the most suitable approach for visitor accommodation within the KCZ. Meaningful consultation can lead to better planning outcomes and minimize conflicts. This change would allow for up to 22 visitor accommodation units, which we believe is excessive.

FS91.39	Waiaua Bay Farm Limited	S463.112	Kauri Cliffs	KCZ-R3	Delete the reference to the Kauri Cliffs zone from Rule KCZ-R3	Oppose	Disallow
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112 OPPOSE – KCZ-R3 Object on basis of not agreeing to have a 60-section subdivision as

Tangata Whenua neighbouring property, again reference to Section 32 report is highly relevant here. The Section 32 Report on Tangata Whenua is a significant document in New Zealand that addresses the relationship between indigenous Māori people/Tangata Whenua and various policy or development proposals. It is a requirement under the Resource Management Act 1991, and it serves as a critical assessment tool for decision-makers when considering the social, cultural, and economic impacts of proposed projects. In essence, this report aims to strike a balance between development and the protection of Māori cultural and environmental interests. The Section 32 Report outlines several key elements:

- ▣ Policy Context: It provides context for the proposed policy or development, explaining why it is necessary and the issues it aims to address.
- ▣ Objectives: The report clarifies the objectives of the proposed policy or development and how it aligns with relevant legislation and planning documents.
- ▣ Alternatives: It assesses alternative approaches or options, considering their potential impacts on Tangata Whenua and their cultural and environmental values.
- ▣ Consultation: The report details the consultation process undertaken with Tangata Whenua and the extent to which their views and concerns have been considered.



☰ Effects on Tangata Whenua: It evaluates the likely effects of the proposal on Tangata Whenua, including social, cultural, and economic impacts, and whether any adverse effects can be mitigated.

☰ Mitigation Measures: If adverse effects are identified, the report outlines proposed mitigation measures to address these impacts.

☰ Overall Assessment: It provides an overall assessment of the proposal, weighing its benefits against the potential adverse effects on Tangata Whenua.

☰ Conclusion: The Section 32 Report concludes with recommendations for decision-makers, including whether the proposal should proceed, be amended, or declined based on its findings.

Overall, the Section 32 Report on Tangata Whenua serves as a critical tool in the decision-making process by ensuring that the concerns and interests of Māori communities are taken into account when considering developments or policies that may affect their cultural, social, and economic well-being. It reflects New Zealand's commitment to honoring the Treaty of Waitangi and recognizing the importance of Māori perspectives in resource management and policy development.