Memo

To: **Shanan Miles, Owner/Planner Milesco on behalf of Rotorua Lakes Council**

From: **Rebecca Foy, Director**

Date: **5 May 2025**

Re: **Pūwhakamua Reintegration Facility Social Impact Assessment (SIA) Review**

The purpose of this memo is to review the SIA prepared by Just Add Lime in response to the s92 request for further information letter dated 13 December 2024.

Introduction

The s92 letter requested that the applicant provide "A Social Impact Assessment prepared by a suitably qualified and experienced person in the fields of social research and/or the assessment of social effects" due to the high levels of community interest, with approximately 40 separate emails to Council in relation to the proposal. As noted in that letter, in addition to general concerns about social effects relating to matters such as safety, amongst the key themes in emails were concerns about a lack of wider community engagement and consultation, potential misinterpretation and misrepresentation of views in the communication record, concerns over the current operations in other Rotorua locations, and the manner in which the Site was acquired, collectively leading to mistrust of the proposal within the community.

Just Add Lime were commissioned by the applicant to undertake a SIA for the proposal. This memorandum reviews the SIA to provide the planner with information about the robustness of the SIA.

What are the core elements of a SIA?

To assess the robustness of the SIA, it is first important to understand what an SIA should include and assess. SIA is a process that provides information to decision makers and affected people when planning for change.[1] It includes analysis of the intended and unintended consequences of policies, plans, programmes and projects on people and communities.[2] Social impacts refer to effects on

[1] Taylor, C.N. and Mackay, M. (2022). Social Impact Assessment: Guidelines for Thriving Communities and Regions. Building Better Homes Towns and Cities, Wellington, New Zealand.
[2] Vanclay, F., Esteves, A.M. and Franks, D.M. (2015) Social Impact Assessment Guidance for Assessing and Managing the Social Impacts of Projects. USA: International Association for Impact Assessment. Available at https://www.iaia.org/uploads/pdf/SIA_Guidance_Document_IAIA.pdf

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individuals and communities, resulting from proposed changes that will alter the day-to-day way in which people live, work, play and relate to each other, organise to meet their needs, and generally participate as members of society.[3]

An SIA is the documentation and evaluation of a broad range of social, cultural, demographic, and economic consequences of activities for all major stakeholders (individuals/households, businesses, groups, communities and sectors of society), that have an interest in, or are likely to be affected by, a proposed action/change. An SIA attempts to address the following questions:

- What will happen if a proposed action were to be implemented – why, when and where?
- Who will be affected?
- Who will benefit and who will lose?
- What may change under different alternatives?
- How can adverse impacts be avoided or mitigated, and benefits be enhanced?

Social impacts vary in their nature, and can be:[4]

- Positive (beneficial) or negative (adverse)
- Tangible or intangible
- Direct, indirect, or cumulative
- Directly, indirectly or partly quantifiable, or only able to be described and assessed in qualitative terms.
- Experienced differently, by different people and groups, by different communities and at different stages of the project (short-term, long-term, one-off, multiple, localised, widespread, reversible, irreversible, low probability or high probability).

Taylor and Mackay (2022)[5] identify that SIA helps decision makers to balance the outcomes sought from a change by:

- Exploring the social impacts and identifying options ahead of decision making.
- Designing mitigations that will reduce negative impacts and enhance positive aspects of the proposed change.
- Managing social impacts once change occurs.

[3] Burdge, R.J. 2004. Social Impact Assessment: Definition and Historical Trends in Burdge, R.J (2004) The Concepts, Process and methods of Social Impact Assessment.
[4] NSW Department of Planning and Environment (2017). Social Impact Guideline.
[5] Taylor, C.N. and Mackay, M. (2022). Social Impact Assessment: Guidelines for Thriving Communities and Regions. Building Better Homes Towns and Cities, Wellington, New Zealand.

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- Monitoring longer term community outcomes.

The SIA process includes milestones and deliverables such as reports and plans during the change cycle. The process should start as early as possible, at the inception stage, and continue during implementation, and after the change has occurred.

Table 2 of the Just Add Lime SIA summarises the key social impact categories that are utilised by the International Association of Impact Assessment (**IAIA**) and have been incorporated into their assessment in Section 5 and Appendix 1. The IAIA framework is a universally accepted starting point for SIAs. A robust SIA should incorporate and describe all these changes to provide enough detail to decision-makers to allow them to assess the likely social effects as required by Part 2 of the Resource Management Act.

Review of the SIA

Typically, the key steps for a SIA are:

- Scoping the assessment of effects – including understanding the proposed changes and identifying a short-list of the likely social impacts that may be important to the community.
- Understanding the social baseline and providing a social overview – for example understanding the number of people and households, employment activity, social infrastructure and demographics of the community. The social baseline also describes the social conditions, community and way of life before any effects of the proposed changes occur. A social overview includes outlining any historic social issues or trends as well as the current conditions and important values held by the community.
- Establishing a SIA framework for exploring the social wellbeing outcomes. Typically, this involves undertaking a literature review to understand the range of likely social wellbeing effects.
- Understanding the likely social impacts in partnership with the community - through community engagement, including testing and refining the SIA framework.
- Providing recommendations and guidance about methods to mitigate any adverse effects or enhance any positive effects likely to arise from the proposal.

I can confirm that these steps have all been undertaken by Just Add Lime, including undertaking more thorough public engagement than the initial engagement (i.e. that undertaken by the Department of Corrections supporting the original application), which had been identified by the community as being below standard to them. Further comments about the methods and techniques used in the assessment are provided below.

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The proposal

It is important to note that the participants of the rehabilitation facility have been assessed by the NZ Parole Board as being sufficiently rehabilitated to be released from prison under supervision. People that have been released by the NZ Parole Board may already be living in a community without community members being aware that they are present. The proposed activity would result in a concentration of people undergoing rehabilitation clustered together within a small rural community. The SIA identified that there are a range of reasons why community members feel uncertain about the activity locating in their community. It is important to note that the Trust will be developing rules for participating in the programme, but participants do not have the same constraints as prisoners.

Scoping the social impacts

The literature review examined social impacts that have been identified from other research projects relating to prisons and youth justice facilities in Aotearoa/New Zealand. Given the lack of information about relevant reintegration facilities in New Zealand, this scoping work was appropriate, and likely to highlight many of the issues that are deemed to be relevant to the Waikite Valley community.

Social baseline and social overview

The SIA documents some of the challenges that were highlighted in the emails to Council and expands on other issues, including that:

- There is mistrust in both the Trust and the Council within the community.
- There are misperceptions about the existing Pūwhakamua operations at other locations.
- The way the land was acquired by the Trust is concerning and not aligned with the community's values of honesty and trustworthiness.
- Community members are vulnerable/sensitive due to being isolated and distant from emergency services and having unreliable communications and electricity supply.
- There have been previous incidences of theft associated with reintegration and youth justice (including the Sponsor farmer program for ex-prisoners), and media portrayals of rural crimes such as the Bouma home invasion case in Reporoa in 1998.

The key values of the Waikite Valley community have been identified as shared values of honesty, integrity, and trustworthiness, being hardworking and self-sufficient, and valuing cooperation between neighbours. Residents highly value their freedom, space and peacefulness offered by the rural environment and living close to nature. This reflects research findings of Manaaki Whenua - Landcare Research's "Survey of Rural Decision Makers" (**SRDM**) which identifies that farmers have strong connections to the land and are concerned about their environment, and lifestyle block owners value living in a rural environment and having peace and quiet. The survey also highlights that rural

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people can often feel disconnected and underappreciated by other New Zealanders. In terms of wellbeing, farmers were assessed as having slightly poorer wellbeing than the general population, and a similar risk of mental illness and depression. In contrast lifestyle block owners tended to have greater wellbeing than the general population.

The host community has been defined as those properties within a 3km radius, based on principles highlighted in social impact literature including visibility, topography and surrounding roads. A wider host community has also been identified using SA1s. It is assumed that directly neighbouring sites would have more constant reminders of the facility operation and would therefore be likely to be more affected than others in the community that are not directly neighbouring the site. I agree with these definitions but note that the SIA highlights that the "community thinks of distance differently, and several pointed out that while 3km might represent quite a distance from a facility such as the proposed in an urban environment, in an isolated rural community 3km is very close".

In my opinion the SIA has adequately assessed matters from a social baseline and overview perspective.

Social Impact Framework

To assess the social impacts, a methodology adopted from Esteves (2017) has been used which has three key steps:

1. Evaluating the magnitude – which includes the gravity and extent of impacts and any ability to remediate adverse effects or accomplish positive outcomes.
2. Estimating the likelihood of effects arising.
3. Applying a social risk/opportunity rating.

This approach uses a rating system to classify the social impacts for each wellbeing element, which is a common approach used by SIA practitioners, and is an approach that I have used in other assessments. It is important to note that because the weightings are generalised, they do not show the spectrum of social effects that can be experienced differently by individuals within the Social Areas of Influence. People often respond differently to impacts based on their own experiences and perceptions and appetite for risk/making trade-offs, and for this reason a continuum of impacts can be experienced where one individual may experience significant impacts and another may be much less affected by the same issue.

Applying a generalised weighting can in many cases mask the range of effects experienced, and it is therefore important to read the context described in the text to understand the underlying subjective assumptions of the researcher. The approach can lead to offense being taken by participants who feel that their perceptions of effects have been downplayed, which can lead to additional outrage, mistrust, and opposition to the proposal. The Just Add Lime SIA does acknowledge this risk when it

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states “it is noted that sometimes concerns raised through engagement may be disproportionate to findings from technical assessments of likelihood, duration and/or intensity”. I discuss this later in this memorandum. The Just Add Lime assessment does acknowledge that the fears and concerns raised by the Waikite Valley participants are ‘real, normal and to be expected’ and I agree with this statement.

Understanding the likely social impacts

In terms of the engagement strategy, invitations were delivered to 113 letter boxes, including 27 within 3km of the proposed facility and 86 in the wider area. Appendix 2 identifies that there were approximately 111 households in the community in 2023, and while there will also be businesses and other properties without households on them, this shows that there was a comprehensive effort to engage with as many people as possible. The SIA notes that demand for interviews was so high that written feedback from some parties was received due to interview capacity constraints, though it notes that the written feedback was not included in the assessment of social impacts. Later in this memorandum I comment on the social impact themes that were shared with Just Add Lime in those emails (Appendix D), and I note that it will be disappointing for those people that prepared (in some cases) detailed emails outlining their concerns, that these views have been largely ignored, presumably due to resourcing constraints.

There were 12 interviews conducted with community households (9 within 3km and 3 in the wider community, noting 2 scheduled interviews were cancelled). The interview and engagement format that was applied is appropriate for understanding the way of life in Waikite Valley as well as perceptions about the likely social effects arising from the proposed activity.

Representatives from NZ Police and Fire and Emergency New Zealand (**FENZ**) were also interviewed in separate interviews to understand how they would respond to any issues that may arise from the operation of the facility.

Small group meetings were arranged with representatives from the Waikite Valley Community Collective (**WVCC**), with 2 members living within 3km and 3 members living in the wider community. The SIA notes that the WVCC was created and organised with approximately 80 participants attending a public meeting, due to research and oral information being provided to locals which led to opposition to the Trust and the proposed facility. Since that meeting a petition with 530 signatures has been produced and legal advice has been sought to communicate opposition to the Council.

In general, the SIA identified three core beliefs that the underlying fears and oppositions of the community are based on, including:

- The participants have committed terrible offences, and they would not feel safe having them in their community.

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- They do not trust the Trust to protect their safety. A lack of awareness of rural values and way of life and transparency and openness has been demonstrated by the Trust.
- "It is unfair and unreasonable to expect us to host this facility in our community when there is no assistance available when something goes wrong, no authorities to monitor consent compliance and participants' compliance with the program requirements".

The SIA assesses the likely social effects based on the duration of the activity being for the three years of the property lease. I note that the consent applied for has no expiration date, and therefore once the consent has been granted the lease could be renewed and the facility could operate in the community for longer than three years. Figure 1 provides a summary of the social effects identified in Just Add Lime's assessment and the scorings applied. The SIA has considered many of the effects outlined in the literature review and highlighted by the Waikite Valley community in interviews. While I do agree that once the facility has been operating in the community for a number of years and limited adverse effects have arisen from its operation that the perceptions of effects are likely to diminish, I do not agree with some of the ratings/scores applied to a few of the categories in the intervening period (0-3 years), as discussed further below.

Figure 1: Just Add Lime's SIA for Pūwhakamua operations

Social Wellbeing Element	Positive	Negative	Within 3km radius	Wider Waikite Valley
Health and wellbeing	-	Increased risk to personal safety and the associated impacts on wellbeing, including reduced mental and physical wellbeing from fear and anxiety	**High**	**Low**
	-	Increased risk to personal safety resulting from abscondment	**Low**	**Low**
Way of Life	-	Lifestyle changes to avoid perceptions of risk, e.g. changes to household and transport arrangements, changes to children's and women's behaviour, and additional security routines	**Medium**	**Low**
Community	-	People may choose to move out of the area	**Low**	**Low**

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Social Wellbeing Element	Positive	Negative	Within 3km radius	Wider Waikite Valley
	-	Impacts to sense of safety may result in increased social isolation and reduced community cohesion	**High**	**Low**
	Increased community cohesion through the Community Liaison Group and mutual exchange of goods and services	-	**Medium**	**Medium**
	Increased community resilience through resources that can be shared during a natural disaster	-	**Medium**	**Medium**
Surroundings	-	Eroded sense of place due to physical changes	**Low**	**n/a**
	-	Loss of privacy	**Medium**	**n/a**
Decision making systems	-	Reduced use and enjoyment of properties and rural environment, including decrease in property values[6]	**Low**	**Low**
Livelihoods	-	Reduction in people's ability to earn income from their property	**Low**	**Low**
	-	Additional costs to secure property e.g. installing security or employing security services	**Medium**	**Medium**

The SIA identifies that for those living within the 3km radius who have existing health problems which may be exacerbated by stress, they may experience impacts to their health over a long timeframe and those effects may not be able to be mitigated. The assessment also acknowledges that similar impacts may arise for people living in Waikite Valley, however these are assessed as low overall. In my opinion, there is unlikely to be a difference in the level of social effects based on proximity for health and wellbeing while the facility is establishing its operations. Those distinctions are unlikely to become apparent until the facility has been operating successfully and trust has been established within the community. It is likely that there may be high impacts for some individuals over the initial establishment period, although I do agree that eventually those effects could be likely to reduce if

[6] I note that Case Law determines that decreased property values cannot be taken into consideration due to the perception that property value impacts are accounted for in amenity effects – refer to Foot v Wellington City Council, Environment Court decision number W73/98 at paragraph [256].

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minimal social effects arise over the operational period. In the same manner, it is my opinion that the social wellbeing effects relating to social isolation and reduced cohesion may be similar for some affected parties whether they live in the 3km radius or within the wider Waikite Valley community. Aside from those differences of opinions, I agree with the ratings as they have been applied. I do note that it would be beneficial to classify the ratings in terms of whether they are significant (more than minor) or lesser in RMA terms, along with providing broad estimates of how many people would be likely to be affected.

In addition to the effects summarised in Figure 1, the SIA also highlights a range of positive impacts for the participants of the programme that are not categorised or rated. It is appropriate that the benefits of the programme for participants have been considered in the assessment. Benefits include broad benefits to society arising from seventy participants having completed the programme over the last seven years at the existing facilities. Other benefits that are identified for those attending the facility include:

- Establishing a strong sense of self-worth and identity, and place of belonging.
- Gaining a clear understanding of place and purpose, and respect for people and the environment.
- Learning tools and strategies which promote positive behaviours and thinking.
- Participating in cognitive behavioural therapy helping to break the cycle of offending and create success stories.
- Receiving guidance and mentoring to become a pro-social member of the local community and their whānau.
- Learning self-awareness and gaining skills to make behavioural shifts and choices aligned with values.

A key issue arising from this application is that there are significant positive benefits for the programme participants that also accrue to wider society generally, but the District Plan does not make any provision for where these types of activities can locate, and especially in ways that can reduce the social effects.

<u>Feedback provided to Just Add Lime in emails</u>

I have read all the emails that were contained in Appendix D which were provided as written feedback by people who were unable to be interviewed by Just Add Lime. Due to confidentiality, it is difficult to ascertain which emails were from people that lived in the same household, though there are some clues that some emails originated from the same home. There were approximately 27 emails received, all stating their opposition to the proposed facility. Some of those emails were very detailed and thorough about their key concerns, while others expressed concerns about the process and

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requested public notification. The detailed responses are reflective of the types of issues that might be provided in submissions. If that were the case, it would be standard practice to consider the effects outlined in the emails.

Most of the concerns about social wellbeing effects have been addressed in Just Add Lime's SIA. Nearly all emails mentioned concerns about safety or the likelihood of increased crime rates, and disruptions to people's way of life resulting from having to make changes to how they or their family members behaved in the community. About half of the emails raised increased levels of anxiety and stress associated with the prospect of the facility being enabled within the community and identified parties who would be especially vulnerable if safety issues arose. Many emails expressed concern about intimidation that they had heard others had experienced in relation to the proposal and expressed reluctance to have their views shared publicly due to safety concerns.

Some of the emails do provide additional contextual information about the reasons why community members are concerned for their safety, including:

- A third of emails highlighted that the proximity to emergency services based in Rotorua means that it can take an hour or longer for emergency services to respond to calls – there were multiple examples of long delays for other emergencies that have happened in the past leading community members to not have confidence that emergency services will respond fast enough if they are needed. These examples partly contradict the SIA views that NZ Police will prioritise the area, as even if it is a priority to receive a responder ahead of incidents in urban areas, community members could still experience a dangerous situation for a long time until help arrives.
- A contributing factor is that there is limited cellphone and wifi coverage in Waikite Valley (identified by half of the emails), which could lead to safety issues or make it difficult to ensure safety in remote parts of the valley on people's properties while undertaking work or other social and recreational activities.
- A wide range of past crimes associated with the youth home on Te Weta Road and other high-profile crimes such as William Burr, Peter Bentley, the Beverly Bouma and the Campbells on Ngapouri Road were discussed as being relevant to rural ways of life and contributing to concerns about safety and security in rural areas. I note some, but not all of those, cases were identified in the SIA. It is important to consider this information as the context helps to understand how compounding social effects may arise.

Other issues that were raised that are also discussed in the SIA are the effects on:

- property values,
- businesses' ability to operate and concern about theft,
- amenity effects associated with visual impacts,

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- impacts on social cohesion from the potential loss of families and the inability to attract new families or staff into the area,
- participants and the Trust having values which differ significantly from the rural values held by the Waikite Valley residents,
- about one third of emails specifically mentioned issues with the property acquisition process and perceptions of intimidation that had led to trust issues and beliefs that the Trust would not be able to sufficiently manage security onsite.

As mentioned in the s92 letter requesting the SIA, there is a high degree of concern/opposition/outrage in Waikite Valley about the proposal and the willingness of community members to participate in the research and provide their perspective on the potential issues reflects this. These concerns led to the establishment of the WVCC, and it is clear that the community is not supportive of the facility locating their community.

Providing recommendations about mitigation techniques

Just Add Lime recommends that "full, frank, and open communication" between the Trust and the Waikite Valley community would be beneficial, including identifying a representative of the Trust who would be the key point of contact for the community, and I agree that this is essential if the facility is granted consent.

In addition, they recommend a Community Liaison Group (**CLG**) should be established and consist of representatives from the Trust Board and operational management, the local community, and potentially the NZ Police, Rotorua Lakes Council and the NZ Parole Board. The basis for this recommendation is so that positive relationships can be established through a formal environment for expressing concerns and describing impacts while working together to find acceptable solutions. The NZ Police reported that if they are involved in setting up the CLG, they tend to work best as they can make sure the right people are involved "to facilitate a joint conversation and include multiple perspectives".

Just Add Lime also suggested that a CLG subgroup of immediate neighbours would help to identify and understand issues affecting site neighbours and provide "a mechanism for them to feedback on planting plans, construction impacts, and operational plans". The owners of the neighbouring property at Lot 2, 671 Puaiti Road are specifically identified as a party that would benefit from early engagement. In my opinion having a sub group may place extra burden on neighbours to be participating in additional meetings which will come at a time and cost expense to them, and while the outcomes could be beneficial, in practice having a part of the CLG meeting agenda that is specifically devoted to issues raised by immediate neighbours, or by the Trust in relation to immediate neighbours, may be just as effective and less time intensive than having separate sub committees.

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One issue that needs to be considered in the drafting of conditions is that all parties must be willing to be involved in the CLG, and it is difficult to compel specific organisations to be present, especially if resourcing priorities change. The conditions associated with the CLG would therefore need to be carefully crafted so that membership is voluntary, there are enough relevant people involved, and the community feels like they can be open with their concerns and that those concerns will be treated respectfully. Independent facilitation is important to ensure that all voices can be heard whether that is something that is conducted by a representative of the NZ Police or by an independent facilitator. Due to comments discussed in the next paragraph, my belief is that the community may only accept an independent facilitator to hold the meetings. It will be important that the objectives of the meeting are led by the community and that meeting notes are recorded and available to any parties that are interested.

Just Add Lime do note that for these measures to be effective, the community must also be willing to be involved and caution that it may take time for sufficient trust to be established to do this. It is noted that engagement with the NZ Police revealed views that there will be challenges within the community due to the small population and the nature of the existing community, that being "predominantly pakeha, farming families who may have stereotypical views about Māori and about the participants of Pūwhakamua". It is also important to note that there was a very large response to the request for community engagement, and these high levels of interest may mean more people are interested in becoming actively involved which could present other challenges (such as having too many people in the room to keep discussions focussed). For that reason, placing limits on the number of community members present, and a selection process for who is included, will be important to ensure meetings run smoothly from an administrative perspective.

Other suggestions that came through from the literature review and could be considered useful for building stronger relationships with the community but were not explicitly recommended by Just Add Lime could include the Trust hosting members of the community at the facility for infrequent Open Days as a means of showing community members what is going on and being honest about how the Trust and the programme work. Providing the opportunity for community members to meet operational staff and participants may help to encourage better uptake of opportunities for mutual exchange of goods and services. Additionally, the CLG could discuss whether having a community phone tree system would be considered helpful and formalise a process for how this should be managed, should it be deemed to be worthwhile.

It is important to recognise that sometimes in rural communities, as in urban communities, no amount of consultation will change the minds of some community members, and that is a challenge for organisations wanting to operate in the communities and may also lead to effects on social cohesion.[7]

[7] Renewable energy projects divide farming communities - ABC News

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It is clear from the engagement and the emails contained in Appendix D of the SIA that there is widespread opposition to the facility and it is unlikely that the opposition will suddenly change.

Summary

In summary, the Just Add Lime SIA has undertaken a comprehensive assessment of the likely social effects that the community and programme participants perceive will arise from the activity. The SIA has considered relevant literature to scope the range of likely impacts and tested those impacts with a cross section of the community. The engagement exercise also reinforced the high levels of interest in the proposed facility at this location, which was the original basis for requesting the SIA. The assessment provided some helpful case law to show how community perceptions and outrage have been assessed in past Environment Court cases. The findings are that for some social wellbeing elements there will be potentially significant effects for a relatively small population, and that if the facility is well integrated into the community and there are limited or no instances of anti-social behaviour associated with the activity, that those impacts are likely to diminish over time. Nevertheless, it is clear that there is widespread opposition to the facility within the community and this presents challenges for the establishment of the facility, regardless of the positive outcomes that are likely to be accruing to the participants and the wider community.

Further comments on the inclusion of the SIA into the proposed conditions

I have also reviewed the letter dated 9 April 2025 prepared by Hayson Knell to respond to the s92 request in relation to the conditions.

I note that there are some recommendations included in the SIA report that have not been incorporated into the proposed conditions and, in my opinion, some of the CLG conditions need further structure to ensure that the CLG satisfies the community's objectives and ensures that the Pūwhakamua successfully achieves compliance obligations.

In addition, I believe it would be advantageous to have a short-term review period apply, perhaps annually, that can be used to assess whether the facility's operations are generating any significant adverse effects that can be mitigated through further conditions. This would add an extra layer of certainty for the community that once the consent is granted that other avenues exist to help deal with any adverse effects that may arise, aside from contacting the NZ Police.

If you have any further questions or need clarification on any of the matters raised in this memorandum, please do not hesitate to contact me.

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Rebecca Foy

Director

m 021 181 5210

e rebecca@formative.co.nz

w www.formative.co.nz

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