FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

ROTORUA LAKES COUNCIL

Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To:	**Name of Submitter:**
Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Sam McNaull and joseph McNaull, Director Rock Valley Dairy Farming *[Samuel Alexander McNaull] (Joseph Ross McNaull)*

This is a submission on an application from *[name of applicant]:*

Tikanga Aroro Charitable Trust

for a Resource Consent to *[Briefly describe the type of consent, proposed activity, and location of the resource consent]*:

To establish and operate a reintegration housing activitiy in the rural zone 1A of the Rotorua Lakes District Plan (in Waikite Valley)

at *[The location of the resource consent]*:

474 Puaiti Road, Waikite Valley

The specific parts of the application that my submission relates to are *[Give Details]*:

The application in its entirety

My submission is *[include whether you **support or oppose** the specific parts of the application or wish to have them amended; and the reasons for your views]:*

We oppose the facility location because of the social and economic impacts on our farming business. We lease the neighbouring property to the proposed facility. We strongly oppose the granting of resource consent for the proposed Pūwhakamua reintegration facility at 473 Puaiti Road for the following reasons:

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1. Impact on Our Farming Operations and Future Leasing Decisions

Our farming business operates 24/7, with staff and contractors frequently accessing the property at all hours. The proximity of a residential facility housing up to **10 parolees**—without a police presence—raises serious concerns about safety, security, and operational continuity. This uncertainty directly affects our willingness to continue leasing the property and undermines our long-term investment in the land.

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2. Staff Safety and Wellbeing

Farming is an intensive, around-the-clock operation. Staff often work alone, early in the morning or late at night, and may be required to respond to emergencies. The presence of a reintegration facility nearby—particularly one without trained security or police oversight—creates a heightened risk environment. This could lead to:

- Increased anxiety and reluctance among staff to work in isolated areas.
- Difficulty in rostering night shifts or emergency callouts.

- A chilling effect on staff morale and retention.

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3. Impact on Recruitment and Retention

Attracting skilled agricultural workers is already a challenge in rural New Zealand. The presence of a reintegration facility nearby will likely deter potential employees, especially those with families or concerns about personal safety. This could significantly impact our ability to maintain a reliable workforce and meet production targets.

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4. Proximity to Operational Airstrip

Our property includes an operational airstrip used for agricultural aviation (e.g., topdressing, spraying). The airstrip is located adjacent to the proposed facility. This raises several concerns:

- **Safety risks** for residents and staff of the facility due to low-flying aircraft.
- **Operational restrictions** or complaints that could arise from noise or perceived danger.
- **Regulatory complications** if the facility's presence leads to limitations on airstrip use.

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5. Incompatibility with Rural Land Use

The proposed facility is fundamentally incompatible with the surrounding rural land use, which is primarily agricultural. The introduction of a residential facility for parolees into this environment:

- Disrupts the rural character and purpose of the area.
- Introduces urban-style social services into a zone not equipped for them.
- Sets a precedent for further non-rural developments, undermining the integrity of the District Plan.

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6. Lack of Adequate Oversight and Emergency Response

The facility will be staffed only by lay personnel, with no on-site police. This is deeply concerning given the nature of the residents and the remote location. In the event of an incident, emergency response times could be significantly delayed, placing both residents and neighbours at risk.

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7. Community Cohesion and Perception

The proposal has already generated significant community opposition, as evidenced by public meetings and petitions. The facility risks creating division and fear within the local community, which thrives on mutual trust and cooperation—essential values in rural life.

Conclusion

We respectfully request that the Rotorua Lakes Council decline this application in full. The proposed reintegration facility poses unacceptable risks to our farming operations, staff safety, and the broader rural community. It is not an appropriate use of land in this location and would have far-reaching negative consequences for those who live and work nearby.

I seek the following decision from the consent authority *[Give precise details, including the general nature of any conditions sought]*:

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To decline the application

☑ **I wish to be heard in support of my submission**

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of submitter *(or* person authorised to sign on behalf of submitter): 	Date: 21-Jun-2025
[redacted]	[redacted]
Contact person: *[name and designation, if applicable]* Sam McNaull	[redacted]

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.