Doc No: IT-2044 (1 June 2005)

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)

То:	Name of Submitter:
Chief Executive	Steven James Gresham and Belinda Ann Gresham
Rotorua Lakes Council	
Private Bag RO3029	
ROTORUA	[Full Name]

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]:

Establish and operate a reintegration facility - land use - non-complying

at [The location of the resource consent]:

473 Puaiti Road, Ngakuru, Rotorua (Also referred to as 437 Puaiti Road and 671 Puaiti Road)

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

Noise effects
Traffic effects
Visual effects
Reverse sensitivity effects
Rural character and amenity effects
Inadequate water supply

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 this application due to the negative impact this facility will have on a range of factors affecting rural character and amenity values. Please refer to the two separate pages of information submitted with this form for details.

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

We seek to have this application declined as the proposed isolated rural location is inherently unsuitable for a facility of this

We do acknowledge the important service provided by such facilities and would urge Council to consider providing suitable zoning for such facilities in future District Plans.

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:		
Egusten Breshoul	25-Jun-2025		
Address for service of Submitter:	Telephone:		
Contact person: [name and designation, if applicable]	Fax/email·		
Belinda Gresham			

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.

Submission for Resource Consent Application: LU24-010243 - S & B Gresham

We are concerned about potential noise effects from the proposed facility as the surrounding hills act as a natural amphitheatre, directing and amplifying sound. From our location we have on occasion heard human voices and sounds of hammering from the unoccupied lot adjacent to the proposed site, confirming that sound can travel considerable distance in the valley environment. The Applicant has stated that the nearest dwelling is 480 metres away from the proposed site and that no noise from the proposed site is expected to be audible to this dwelling. They have failed to consider noise heard from surrounding farmland, which is the natural work environment for people in this rural area. Our experience indicates that in the valley environment it is not possible to predict noise effects based solely on distance from noise source, or on having a 'direct line of sight'. From our location it is possible to hear vehicles travelling on the road when they are still over 1 kilometre away, and farm equipment operating in a paddock at a distance of 1.5 kilometres. In our opinion it is likely that potential noise effects from the proposed facility have been underestimated in the application. As this is generally a very quiet area any increase in noise will be impactful thus decreasing rural amenity value and rural character.

We are concerned about the effects of increased traffic which would be associated with the proposed facility. Currently, there is a very low amount of traffic movement in the area, especially on weekends. On a Saturday or Sunday it is not uncommon to see perhaps just 1, 2 or 3 vehicles throughout the entire day. The Applicant estimates that additional traffic movements associated with the facility would be 'low', around 10-14 vehicle movements per week day, however as this does not include all potential traffic such as goods and services deliveries, tradespersons, visitors etc. this is likely to be an underestimate. While the conservative figure of 10-14 movements/day may well be considered low in an urban environment, within this isolated rural community this increased number of cars passing gateways is significant. Furthermore the additional visitation number in the weekends and associated noise will have substantial adverse effects on the amenity value and character within this rural zone.

We are concerned that any change of zoning will have a detrimental effect on the existing lawful agricultural operations of the surrounding properties. When current residents choose to live in Waikite Valley, they work through a selection process comparing environments. The residents of this facility will not have the luxury of choice on the environment in which they are placed upon release from prison when moving to this facility. They will be unaware of, and may become uncomfortable with the noises, odours, adverse weather conditions, and 24hr a day operation in this particular location. There is potential for reverse sensitivity effects to be significant.

We are concerned that the proposed planting scheme will not provide the planned amount of coverage/closure within the target timeframe, owing to the harsh growing environment in the area (hot summers, cold winters, extended dry periods). Our own native landscape plantings, using the same proposed species (but at closer spacings and with larger grade plants), have been established for more than six years and are still yet to 'fill in' due to the slow plant growth typical of the area. Newly established plantings struggle in the summer heat of the valley and require frequent watering in the early stages. We also believe that the applicant has overstated the potential screening effect of some of the proposed species in the application. As the proposed facility includes a multitude of separate buildings, the impact of which the landscape

Submission for Resource Consent Application: LU24-010243 - S & B Gresham

planting is being relied upon to ameliorate, any planning or planting failures will leave the site overly exposed, creating a negative visual effect thus decreasing rural amenity value and rural character.

We are concerned about the proposed facility's layout, featuring no less than 17 buildings tightly packed on part of a 2ha site. This is fundamentally at odds with the rural character and amenity values explicitly protected by the Rotorua Lakes Council District Plan. This plan prioritizes 'low density of buildings and generous separation distances,' a principle evident in the existing built environment. When you drive through the valley you notice the large distances between homes, sheds and outbuildings, exhibiting the open spacing that defines the area's rural character. This existing landscape sharply contrasts with the proposed facility's high-density design, which will significantly detract from the rural amenity.

We are concerned that the frequent unplanned outages of essential utilities (power supply, internet and mobile telecommunication services) experienced in the area will compromise safety and operation of the proposed facility (for example, inability to contact external persons in an emergency situation, or electronic monitoring interruptions). Mobile cell coverage is patchy, with service in many parts non-existent, or poor at best. There is only one cell tower (owned by OneNZ, formerly Vodafone), servicing the area and this was already deemed to be overloaded as at a number of years ago (Source: One service contractor). The copper landline facility in the area has been decommissioned by Chorus.

We are concerned at the lack of provision for storage and collection of sufficient volumes of potable water for the site. No reticulated water supply is available in the area, and the applicant has stated they intend to use rainwater. Site plans show that four 15,000L tanks have been allowed, with one of these a dedicated attenuation tank, leaving a storage capacity of 45,000L. In our experience this amount of water (without any rain) will last a two-person household about six weeks. This volume would be completely inadequate for the usual number of people proposed to be onsite (n=12), let alone expected additional people. The capacity of the available collection area to gather sufficient rainwater is also doubtful, in our view. This shows a lack of understanding of the environmental conditions in this area, which can experience long, hot summers and extended dry periods, particularly during El Niño events. There has been a lack of consideration into adequate volumes of water required for domestic use, as well as maintenance of native plantings (as per application for Resource Consent), mandated emergency fire-fighting water provisions, and supply for any potential food crops or animals.