

**BEFORE A HEARING PANEL  
CONSTITUTED BY HORIZONS REGIONAL COUNCIL**

*IN THE MATTER*

of an application dated 21 December 2020 for regional consents by Grenadier Limited to develop the Douglas Link Golf Course at 765 Muhunua West Road, Ōhau

*IN THE MATTER*

of Part 6 of the Resource Management Act 1991

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**MEMORANDUM OF COUNSEL FO THE APPLICANT REGARDING  
THE NOTE BY NGĀTI TUKOREHE DATED 1 JUNE 2022**

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**Applicant's Consultant:**

Land Matters Limited  
20 Addington Road  
Otaki

Attn: Tom Bland  
[tom@landmatters.nz](mailto:tom@landmatters.nz)  
027 877 894

Counsel acting:

**John Maassen**  
— BARRISTER —

✉ [john@johnmaassen.com](mailto:john@johnmaassen.com)  
🌐 [johnmaassen.com](http://johnmaassen.com)  
☎ 04 914 1050  
📠 04 473 3179

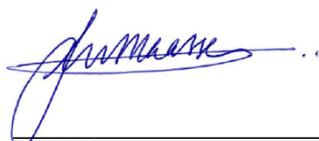
**MAY IT PLEASE THE PANEL :**

- [1] Filed with this memorandum are Grenadier Ltd's reply legal submissions and other material in an electronic folder.
- [2] Grenadier Ltd's reply legal submissions were at a mature stage when unexpectedly, Ngāti Tukorehe filed its note dated 1 June 2022. Previously, Grenadier Ltd asked Ngāti Tukorehe for a statement on the proposals of Grenadier Ltd that Grenadier Ltd could incorporate into the reply submissions. Grenadier Ltd explained to Ngāti Tukorehe that only Grenadier Ltd had a right of reply.
- [3] After considering the note dated 1 June 2022, Grenadier Ltd thought its reply legal submissions accurately captured what happened and Ngāti Tukorehe's position. Accordingly, Grenadier Ltd did not amend its reply legal submissions to address Ngāti Tukorehe's note. Instead, this memorandum responds to that note.
- [4] The Panel will observe that, unusually, Ngāti Tukorehe arranged to record the Zui and Grenadier Ltd was notified of that at the start of each Zui. Grenadier Ltd has not verified these recordings, but presumably, they are an accurate electronic record of what occurred. Grenadier Ltd is comfortable with how it conducted that consultation and, indeed, all its engagement over a long period.
- [5] Grenadier Ltd has acted on advice through the process and, at all times, engaged with tangata whenua in a positive spirit. More recently, Mr Edwards did not seek to exclude Muaūpoko's late submission. Instead, he immediately identified their interests by personal consultation and actively engaged with them to address their values and interests.
- [6] In the Zui recording, Mr Poutama admitted he had been consulted by Ngāti Kikopiri early in the process. So had Mr Seymour and Tahamata Incorporated before lodgement of the applications. Grenadier Ltd's representatives, including Mr Edwards, attended a hui at the Ngāti Tukorehe marae just before the hearing. The **attached** whiteboard table

written during that hui by Ngāti Tukorehe showed the Douglas Links Golf Course proposal ticked many of Ngāti Tukorehe's boxes and scored highly on ecological restoration. Dr Smith said at that hui that Ngāti Tukorehe's response would be more positive at the hearing than planned. The reasons for Ngāti Tukorehe's current approach are unclear to Grenadier Ltd.

- [7] The ideological filters of some of the current representatives of Ngāti Tukorohe frame a strong oppression narrative along racial lines. That has not proved to be a good foundation for rational discourse on resource management matters.
- [8] Ngāti Tukorehe seems to consider that Grenadier Ltd's financial resources should be used to create something like a reserve on the site and the use of the remainder of the land for a 9-hole golf course. Respectfully, Grenadier Ltd disagrees, and its position is not based on ethnocentric colonisation as Ngāti Tukorehe claims. Grenadier wishes to improve the biodiversity and natural character values of the land and continue to consult with Iwi on acknowledging this collective history with the site respectfully with willing parties.
- [9] Ngāti Kikopiri is somewhat concerned that their manawhenua status has not been made as visible as it should be because Ngāti Kikopiri has engaged in processes to secure its interests and values directly with the Applicant while leaving the other contentions for the front of the Marae. However, if that raises any unanswered matters of significance, then the Panel could reconvene by AVL to hear directly from Ngāti Kikopiri.

Dated 3 June 2022



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John Maassen  
Counsel for the Applicant

